

## BLM-LSRD RMP Comments (Sorted by Comment Code)

### Comment Code

### Comments

1100

The purpose and need statement should be short and clear-preferably 1 to 2 sentences and certainly not more than a paragraph. Purpose and need statements that are pages long can cloud the statement, leaving readers unsure as to the actual need. All background or supporting information regarding the purpose and need statement should be placed in a "background" section immediately following the purpose sentence. The purpose and need statement should not prescribe the solution or excessively narrow and options; rather, it should enable the generation of a full range of alternatives.

The real underlying needs (vs. wants) should be stated. The purpose should be simple to meet the needs without compromising the competing needs identified by the stakeholders, including citizens, businesses, local government, non-governmental organizations, and government agencies.

The basic need to be met is stated first. Then the purpose statement draws together the key competing needs or concerns voiced by the proponent, resource agencies, and other stakeholders for the proposed project. The purpose and need statement works as a joint problem statement, blending a variety of views and interests. In this way, the purpose and need statement serves to focus participants' attention upon finding a reasonable range of alternatives, and ultimately a single alternative that is mutually preferred.

The first step in the process should be to assess the applicability, progress, and success or failure of the existing land use plan, and if there is any need to change it. . . .To accomplish the first step, the existing objectives should be reviewed to determine whether they still meet legal and regulatory requirements. If existing objectives are still applicable, they should be retained. If they are not applicable because the laws and regulations have changed, they should be modified so as to reflect such changes, or they should be discarded, or new objectives should be added. Objectives must, of course, be reasonable, attainable, and measurable. Objectives should not be subjective, and should not be based on a "whim" of political correctness.

Once the applicability of the existing objectives is assessed, the second step should be to determine the effectiveness of previous management actions in meeting stated objectives. . . . The evaluations should be made to determine which management practices were effective in meeting applicable management objectives and which were not.

the first step should be to evaluate the current applicability of the objectives of the existing plan.

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Objectives that are found to no longer be applicable or needed should be discarded. Existing objectives that are still applicable should to be refined or modified to reflect current needs and brought forward into the new plan as modified. Finally, new objectives should be formulated for any legal and regulatory requirement identified for which there are no applicable existing objectives.

Once the applicability of the existing objectives is assessed, the effectiveness of previous management actions in meeting stated objectives should be evaluated, particularly for those objectives that are to be rewritten and brought forward in the new plan.

The BLM should develop and clearly articulate its vision and mission for these lands and develop goals that will move management in the direction of protecting and achieving its vision.

1300

"How will the extent of RMP implementation and its effectiveness in resolving identified issues be determined?" To resolve this issue, BLM should consider: accuracy and currency of data; construction of hypotheses related to implementation and effectiveness of aspects of the RMP; design of monitoring protocols to provide information relative to testing these hypotheses; and adaptive management protocols in response to monitoring and hypothesis test results.

Since those developing plans are currently in the latter stages of "issue identification," we are especially concerned that the final product of the planning effort will be significantly skewed from the outcome that would have resulted had the agency complied with Federal law and regulation.

1410

Perhaps the most significant flaw in the scoping process has been the preparation plan work which has set the basic scope of the two developing plans. In creating the two pre-plan documents without county involvement, BLM has set the scope of the issues to be considered by the planning process. We maintain that the pre-plan documents are inconsistent with the County Plan, fail to adhere to the FLPMA mandate for multiple use and sustained yield management, and serve to steer the public comment to a set of issues pre-determined by BLM staff.

We have just submitted extensive comments on the Bruneau RMP, and we ask that you closely review these, and apply all relevant comments on RMP preparation and analysis, maps, livestock grazing, range facilities, removal of livestock wells and pipelines, livestock grazing suitability analysis, soils, weeds/exotic species, predator killing, post-burn rest form livestock use, the sagebrush sea, protection of native vegetation, TNR, grazing permit buyout/retirement, economic analysis, ORV use and roading to the SNRBOP process as well.

Please also apply all references mentions in our Bruneau comments, as well as the submitted list of references, to the SNRBOP process as well.

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1440

Need more information provided prior to meetings to help give the public "meat & potatoes" to think about.

1450

Sometimes I hear the BLM and the Forest Service complain that they don't hear enough from our groups. Most of this group is unorganized but there are a few 4x4 groups in Idaho. They are close as the local 4x4 shop. There are at least three such shops in Boise alone. The owners of these shops know most all the 4x4 groups. As a Government Bureaucrat myself I am the first to say that government needs to make a better effort to contact its constituency. It is as much our obligation to contact the public as it is the public's obligation to contact us. Call us sometime.

Provide questions to be answered on newspaper that could be mailed to an address or P.O. Box. Have other agencies participate.

the public scoping meetings have increased the difficulty with which traditional users can make their issues part of the plan while supporting the demand of a vocal minority to restrict uses. This approach, and the use of the "workshop" format in the public scoping meetings, has reduced those public meetings to "PR" activities at which BLM can manage the public input to support pre-determined goals.

In planning documents, papers and notices published for the two new RMPs, BLM gives no indication to the public that the planning effort must be targeted to the requirement to manage for "multiple use and sustained yield". Placed before the public in this way, the request for planning issues becomes an invitation to the public to attempt to develop a plan that exceeds the limits placed upon the agency by the Congress.

In reviewing the pre-plan and the arrangement of the scoping session process, it would appear that an "I don't like cows" mentality was involved. Also supporting this belief was the decision by the Owyhee Field Manager to schedule a second scoping session for the Boise area due to her belief that the turn-out for the meeting, which she stated was good, could have been higher.

All local government branches, OHV clubs, Equestrian groups, Cattle Associations, etc. should be given ample notice of any land status changes. This would require the BLM to make personal contact with these groups in a timely manner as to give them plenty of time to respond. This would be above and beyond the normal legal requirements of public notice that the BLM is required to do.

Comment deadlines should be made available to local media outlets and posted in local newspapers. Failure to do so would restrict public awareness and limit involvement. Every land user group should be consulted on the comment process by a BLM representative at each groups monthly meeting.

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the needs and desires of the conservation community and other interests (sports people, Native Americans, etc.) of the half a million residents around the area should receive greater consideration than the relatively small number benefiting from the livestock, OHV, and mining industries.

A true cross-section of the people actually use multiple-use areas of public lands can only be developed by methods including mailings to OHV owners, field observations, field interviews, and meeting with motorized clubs. Mailings and telephone interviews cannot accurately locate the people visiting these lands. Our field observations of trail use in multiple-use areas have found that over 90% of the visitors observed on travel ways in multiple-use areas were associated with motorized access and recreation. We request that effective methods be developed to involve and account for motorized recreationists.

Many citizens have not understood the extent of the motorized closures proposed in past travel management processes. . . .We request that public understanding and buy-in be stressed throughout the process.

We request that the interdisciplinary team (IDT) include motorized recreation planners and enthusiasts in order to adequately speak for the needs of multiple-use and motorized visitors. A multiple-use and motorized recreationists advisory board could also be used to advise the IDT and decision-makers.

We request that the effectiveness and impact of foundation-funded organizations versus the needs of all citizens be evaluated and factored into the decision-making.

We request that the process adequately meet public involvement requirements with respect to motorized visitors. The process should include methods of public involvement that effectively reach motorized visitors and methods to account for the needs of citizens who may not participate for diverse reasons.

The number of NEPA actions is overwhelming. . . .it is not reasonable to expect citizens to comment on every NEPA action. Therefore, we request that the basic needs of the community, taken as a whole, should be adequately considered and provided for by the Agencies.

We ask that public comments not be used as a voting process and that the needs of all citizens be adequately addressed in the document and decision-making.

We request that agencies conduct collaborative sessions that produce reasonable multiple-use outcomes or simply take that responsibility on themselves.

We ask that the analysis and decision-making be based on sharing and tolerance and to avoid unreasonable accommodation of visitors to public lands that are not reasonably tolerant and sharing.

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we request a Multiple-Use Review Board be established to assure that the decision-making reflects the multiple-use management goals and the needs of the public. We request that a Multiple-Use Review Board look into all past travel management decisions within public lands to determine whether all decisions have adequately considered the needs of multiple-use and motorized recreationists.

We request a commitment by the agencies to these sorts of direct communications with motorized visitors to reach and involve them.

Agencies are encouraged to seek outside review and input by OHV recreationists on all proposed management decisions affecting motorized recreation opportunities including closures.

Agencies are encouraged to establish greater credibility with motorized recreationists by having motorized recreation planners on the interdisciplinary team and a motorized recreationists advisory board.

Agencies are encouraged to establish OHV census collection points at road and trail collection points. Include an OHV category on all trail and road census sheets.

1460

Recreation: Education of public on motor vehicle rules and laws to be included

Public education about resources and community involvement. Give emphasis to involving young people. Could a YCC-type program help with data collection for the plan?

Public education is the key to land management and crucial towards creating responsible users of public lands. Signs and informational maps should be made available.

The RMPs should also require increased public education. This should include information to the public on the presence of bull trout and how to identify and how to release bull trout.

The elimination of much needed recreational opportunities is not reasonable without first exhausting all possible means of education to address the problem. . . .We request the full use of education to address visitor problems. Additionally, individual motorized recreationists and groups can be called upon to help implement the educational process.

An alternative to motorized closures would be to keep motorized opportunities open and use education on principles such as those found in the Tread Lightly program and Blue Ribbon Coalition Recreation Code of Ethics and Principles to address and eliminate specific issues associated with motorized recreationists.

We request that education be incorporated as part of this proposed action that the cumulative impact on motorized recreationists of not using education in all past actions involving motorized recreational opportunities be addressed.

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- We request that agencies initiate an education campaign (loud is not cool) to promote the development and use of quiet machines.
- 1470  
General Management: The RAC isn't fair because representation isn't balanced, do things behind people's back.
- 1510  
Coordination and communication with the tribes, the State Historic Preservation Office, local historical societies, area universities and other sources of significant information is important during this planning process to identify and protect the vast array of significant resources present in these landscapes.  
The plan will be developed in coordination with county, tribe and local government who have priority over the interested public. Incorporate and apply the goals, objectives, and implementation strategies for wildlife habitat contained in Fish and Wildlife 2000, Idaho Fish & Wildlife 2000, and Upland Game Bird Habitat Management-On the Rise within all activity plans.  
The Ninth Circuit has specifically ruled that land management agencies must engage in consultation on plans that set guidelines for future resource management decisions, such as RMPs.  
There needs to be better coordination between adjoining National Forest and BLM lands when making maps, laying out trails, and establishing travel plans. In some cases a trail is open in one jurisdiction but becomes closed when it crosses over the boundary to another jurisdiction resulting in an overall loss of motorized recreation opportunity.  
We support a coordinated effort between state, interstate, federal, tribal, and local agencies. All prescribed fires activities must include careful consideration of air quality impacts and requirements.
- 1550  
The Endangered Species Act (ESA) requires the BLM to consult with the appropriate federal agencies, such as the US Fish and Wildlife (USFWS), in cases where proposed activities within the project area could potentially impact candidate or listed species or their critical habitats. Resulting biological assessments and opinions should be developed concurrently with the DEIS and their results should be summarized and disclosed in the DEIS as identified under 40 CFR 1502.25. Proposed activities within the planning area should be based on management plans that conserves and promotes the recovery of candidate or listed species, by reduction or elimination of adverse effects from land management activities within the planning area. Also, we suggest that the BLM investigate the likely occurrence of state sensitive species and critical habitats within the planning area.

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- Bull trout will certainly be affected by the BLM's decisions in developing the new RMPs. Recovery of bull trout and its habitat will depend in large measure on what management restrictions the BLM chooses to implement in the RMPs, such as riparian buffers, habitat restoration, or grazing restrictions. Thus, the BLM must consult with the Fish and Wildlife Service on bull trout as well as any other listed species that would be affected by the RMPs.
- 1560  
Riparian: SCS/NRCS potential technical and funding source  
Potential for grass banking-SCS interested in cooperative management efforts that meet management goals on private and state lands
- 1620  
The planning area is located in the aboriginal use area of the Shoshone and Bannock people in which the tribes maintain treaty rights under the Fort Bridger Treaty of 1868. The tribes are concerned if treaty rights would be affected under this management plan.
- 1640  
In the resource management plan, describe the plan for the protection of cultural resources and traditional cultural properties that are of importance to the tribes. Traditional cultural properties include but are not limited to plants, wildlife, sacred places, water, etc. The tribes need to be directly involved with this portion of the management plan since this is a sensitive issue.
- 1690  
The Shoshone-Paiute Tribes should be engaged at every possible opportunity to determine site locations or particular concerns and their input on how to best protect their heritage and culture.
- 1700  
The RMP/EIS should consider the Interior Columbia Basin Supplemental Draft Environmental Impact Statement (ICBEMP SDEIS) restoration priorities identified for the sub basins in the planning areas.  
The planning areas for the RMP/EIS include sub-basins or portions of sub-basins that are identified in the ICBEMP SDEIS as rangeland areas with Moderate Priority for restoration (Map 3-5),

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The RMP/EIS should consider, therefore, providing greater emphasis on restoring rangeland habitat in these sub basins combined with some or all of the following: reductions in livestock rates, changes in livestock management, reductions in road densities, reductions in human uses, designation of a network of rangeland habitats, and other identified measures in the ICBEMP SDEIS to improve the likelihood of persistence of sage grouse and other species dependent on rangeland habitats.

ICBEMP identified the Owyhee Uplands as one of five areas in the Interior Columbia Basin that could provide habitat for gray wolves. BLM must consider this in the RMP, and take all steps to ensure that wolf habitat is available for dispersing, and/or reintroduced gray wolves.

BLM should incorporate the findings and recommendations of the Interior Columbia Basin Ecosystem Management Plan into its aquatic management goals and objectives.

the development thus far of the two new plans is inconsistent with the Owyhee County Land Use and Management Plan for Federal and State Lands (County Plan). Where the County Plan remains consistent with the mandates of FLPMA in requiring that, in the development of land use plans, plan developers shall use and observe the principles of multiple use and sustained yield as well as coordinating those developing plans with the land use plans of local governments, the development, thus far, of the Bruneau and Birds of Prey plans fails to meet those requirements.

Agencies are encouraged to develop and use State Trail Ranger Programs through the State OHV Fund, as well as volunteer trail maintenance programs.

1800

General Process/Other: Importance of Congressional intent in designating Snake River NCA. Review wording, and use this as the basis for issues and policies.

General Process/Other: Nationally significant lands comprise nearly all the Bruneau, so, FLPMA mandates you manage for the scarce values, regionally, of vegetation, wildlife, paleo, culture, etc...

It also is important that plans be based on the latest federal laws, regulations, standards, guidelines, and policies.

The RMP/EIS should comply fully with the BLM National Policy on Special Status Species (BLM 6840 Manual), which states that "BLM shall carry out management, consistent with the principles of multiple use, for the conservation of candidate [and sensitive] species and their habitats and shall ensure that actions authorized, funded, or carried out do not contribute to the need to list any of these species as threatened/endangered."

Federal statues such as the Native America Graves Protection Act (NAGPRA), National Historic Preservation Act (NHPA), American Indian Religious Freedom Act (AIRFA), Archeological Resources Protection Act (ARPA) and others, need to be considered in this plan.

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The BLM should focus on the requirements of FLPMA in their developing processes. BLM should make "management for multiple use and sustained yield" their first priority.

BLM further encouraged public support for excursions beyond the limits by indicating specific planning issues that cannot be completed without action by the Congress. . . .If allowed to go uncorrected the insertion of these issues into the planning process will place BLM into the inappropriate position of setting the agenda for action by the Legislative Branch of the Government for whom they work. In terms of local effect, it has the potential to place unnecessary and improper restrictions on uses of the lands that significantly affect the economy, culture, and planning processes of Owyhee County.

BLM staff developed two "pre-plans" in which it identified specific issues for consideration in the plan development process. These pre-plans were developed without consultation with the County and are inconsistent with FLPMA and the County Land Use Plan.

The pre-plan documents attempt on numerous occasions to justify termination or restriction of uses on the basis of public will, regardless of the existence of law that prohibits such action.

pre-plan attempt to establish the need for reduction of use when no clear evidence of degradation of resource condition has been presented.

The planners will make clear to the public that BLM must operate within the limits imposed by the Congress and cannot exceed those limits regardless of the number of comments received by members of the interested public.

Manage to ensure National Ambient Air Quality Standards and Prevention of Significant Deterioration regulations are being met or exceeded.

The National Environmental Policy Act (NEPA) requires agencies to prepare an Environmental Impact Statement (EIS) whenever it is contemplating "major Federal Actions [] significantly affecting the quality of the human environment." 42 USC § 4332 ( C ). A new resource management plan for BLM land clearly requires an EIS.

Those roadless areas identified in the new inventory should be given special protection under the new resource management plan. Protections should include a ban on road building, mining, or other resource extraction or development activities in roadless areas. This is in accordance with the multiple use-sustained yield mandate of FLPMA. Under this dictate, agencies are free to acknowledge that while multiple uses must be supported system-wide, in particular areas there may be some activities that are more or less suitable than others.

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The significant closing of roads and motorized trails in the project area is not consistent with meeting the needs of the public and the goals of Multiple-Use Management as directed under Federal Land Policy and Management Act of 1976 (FLPMA), Multiple Use Sustained Yield Act of 1960 and P.L. 88-657. The cumulative effects of other proposed and enacted federal land management policies have resulted in a significant reduction of multiple-use and OHV recreation opportunities. We request further evaluation of compliance with multiple-use policies and laws and a preferred alternative that will support these policies and laws.

Managing public lands for exclusive-use by a few people or non-use is not in the best interest of the community. There are limited public lands available. We need to manage those lands for maximum communal benefit. We request that available uses of the project area be maximized as required by NEPA so the life's amenities can be enjoyed by as many people as possible.

We request that the document address restoration of these concepts and that steps be taken to restore reasonable multiple-use management and decision-making to public lands.

We request that the travel management process seek out and document the needs of all motorized visitors including those who traditionally use the primitive roads and trails, plus the handicapped, elderly, and physically impaired as required under 40 CFR 1506.6.

We request that the proposed action adequately address and comply with the recommendations of the Study conducted to address P.L. 105-359.

We request that the process comply with all of the requirements of Environmental Justice as presented in the 1997 guidance document prepared by the Council on Environmental Quality.

the significant closing of motorized routes in the project area does not meet the basic requirement of the NEPA act of 1969 as stated in "Sec. 101(b)(5). . .We request that the criteria for high standards of living and a wide sharing of life's amenities include providing recreation opportunities to preserve motorized roads and trails that are part of local culture, pioneer spirit, heritage and traditions.

The environmental document should be an issue driven document as required under NEPA and guidelines published by the Council on Environmental Quality. The driving issue is the development of a reasonable travel management alternative that addresses the needs of the public.

We request that the analysis, preferred alternative and decision-making not let Executive Orders 11644 and 11989 interfere with the management of public land for multiple-uses.

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- We request that the significant negative and inequitable impacts that Executive Orders 11644 and 11989 have imposed on motorized recreationists be adequately evaluated, and factored into the preferred alternative. We request that the decision-making provide for actions necessary to provide responsible use of these two Executive Orders.
- We request that revisions be made to Executive Orders 11644 and 11989 in order to return equitable guidance to federal land-use managers.
- We request that the environmental document be held to less than 150 pages as specified under Section 1502.7 Page Limits of NEPA. Including volumes of data in the text is confusing to public and makes the document unapproachable to the public. The volumes of data should be taken out of the EIS and put into separate Appendices.
- Agencies are encouraged to promote multiple-use and not exclusive-use. Exclusive-use is the antithesis of public access and recreational opportunities within public lands. Exclusive-use runs counter to Congressional directives for multiple-use.
- Wildland and prescribed fires need to be conducted consistent with the Federal Clean Air Act, and any associated federal, state, and local policies and regulations (see enclosures).
- 1910
- I would like to have funding for NCA for (A) Staffing biologists, rangers, visitor center (B) Habitat restoration- i.e. sage brush native grass and mammals
- The BLM should address how the plans will be funded and implemented.
- 1920
- We request that the staff of each district include an adequate number of OHV enthusiasts in order to adequately represent and address the needs of OHV recreationists.
- 1930
- if the process is conducted with the same attitude on the part of the BLM as was done on the Owyhee Resource Area RMP and the AIE planning process that was done on the Castle Creek and Battle Creek Allotments in recent years, then our input will be completely meaningless and useless.
- 2000
- General Process/Other: Have one of the RMP alternative be the science-based view which quantifies objects listed for achievement check points at year 10 and final criteria at 20 years. As in the PSEORMD goals for 50-100 years out is admitting that no one is responsible.

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...in the development of alternatives for the draft RMP/EIS we would like to see development of a Resource Restoration Emphasis alternative. Under this alternative, emphasis would be on actively managing to restore rangeland habitats, wetlands, and riparian and aquatic areas. As with other alternatives, the needs for commodity production and public goods and services would be met within the capabilities and limits of healthy ecosystems.

BLM must develop a range of suitable and clear alternatives. Do not resort to "poison pills", in which an alternative contains something blatantly unacceptable to various factions of public lands users who might otherwise support that alternative.

Given the outstanding values and national significance of BRA lands, BLM must develop several alternatives that focus on wild lands protection, and not continuation of near-status quo livestock stocking rates.

All alternatives must have clear, measurable standards of use and objectives for livestock grazing.

Finally, any alternative management practices that are as effective or more effective in making progress toward achievement of stated objectives should be identified and discussed.

BLM must develop a range of suitable and clear alternatives. A serious alternative, developed by the BLM, that manages for maintenance, restoration, and preservation of native plants and vegetation communities should be considered. All alternatives must have clear, measurable standards of use and objectives for livestock grazing.

The alternatives proposed should be reasonable and serve the purpose of the proposed action. Thus, all alternatives proposed must meet the basic requirements of a FLPMA management plan. This means each alternative must protect a wide variety of resources and uses and not favor any one use or group of uses of the land, and each alternative must follow the multiple use sustained yield dictate of FLPMA.

The existing level of motorized access and recreation was developed by the community through years of involvement in direct relation to the need for motorized access and recreational opportunities. The community is accustomed and relies on this level of access and recreation. We request that the project area remain open to multiple-use and the public and that a reasonable preferred alternative be based on the existing level of motorized access and motorized recreation.

We ask that you develop a preferred alternative that preserves and enhances multiple-use interests and motorized recreation.

We request that the analysis develop a preferred alternative with a reasonable number of designated routes in exchange for the environmental improvements that will be produced by motorized visitor's acceptance of area closure.

We request that these sorts of reasonable alternatives to closure of roads and trails to motorized visitors be adequately considered and incorporated into the preferred alternative.

We request that the environmental document include a travel management alternative for the project area that is adequately responsive to the needs of multiple-use public.

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- A reasonable alternative would incorporate all existing motorized roads and trails and restrict motorized travel to those travel ways. A reasonable travel management alternative should provide a continuous system of roads and trails on which off-highway vehicles can be legally ridden.
- 3000
- General Process/Other: ICBEMP ecological science, national monument proposal contain research into references, analyses and maps sufficient to allow BLM to develop a wide range of alternatives based on protecting significant values of Bruneau lands. BLM must rely on science, not collaboration, to develop alternative and arrive at planning decisions.
- Priority focus is on protection of natural resources and all the existing study areas are well posted.
- What we are really asking BLM to do is, instead of undertaking BLM'S typical "resource extraction" based analysis, BLM consider extraction as only one of many "uses" of these public lands, and analyze it accordingly.
- . . .This same method of analysis must be used for native vegetation, native wildlife, special status species, roadless lands, etc.
- The greatest communal need for public lands is for multiple-use opportunities. Therefore, the most equitable management of public lands is for multiple-uses. . .the Bureau of Land Management and Forest Service have a responsibility to provide recreational opportunities that meet the needs of the public just as government entities provide road, water and wastewater systems that meet the needs of the public.
- Multiple-use management goals are the only goals that will "best meet the needs" of the public and provide for equal program delivery to all citizens including motorized visitors.
- We request that decision-making be based on restoring reasonable management and use of public lands.
- The decision-making should be based on the key issues and the key measurable and quantitative impacts associated with those issues.
- Restore native plants and animals as part of the RMP.
- 3010
- ...the key objective of the RMP/EIS should be maintenance of the sage brush-steppe ecosystem so that important ecosystem functions continue.
- ...the RMP must focus on protection of an intact landscape of sagebrush plateaus and canyon lands to provide unfragmented core habitat for sage grouse, sagebrush-obligate migratory birds, raptors, pygmy rabbit, and other sagebrush obligates such as pronghorn.

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BLM must include a description and analysis of all the special wild land values of the Bruneau country. This includes a discussion of the world-class geology (part of world's largest complex of exposed rhyolite canyons), sage grouse habitat, etc.

Areas should be set aside for sage grouse near their leks, special plants should be protected, and fossil sites should have some degree of protection.

Please designate proper habitat for sage grouse, unique plants and animals and fossil sites.

Protect the special values of the landscape: This includes long-term conservation of its natural and cultural resources, including the unique geologic, paleontologic, biologic, historic, and cultural resources, and other objects of scientific interest.

Protect the remote and undeveloped character of the landscape: . . .The BLM must safeguard these values and resources to preserve the natural, historic, prehistoric, scenic, recreation and other values as unspoiled for future generations.

Connect the management of the pieces to become a system of the whole. The BPA and the SRPOBNCA are part of the larger Owyhee-Bruneau Canyonlands ecosystem. While this planning process seeks to develop management tools for the two specific areas, it is imperative that the consequences of management actions be weighed in the context of this larger ecosystem. . . .BLM must take the utmost care to keep its systems intact and functioning and consider the effects of management actions as cumulative to the health of the region.

Management actions should be taken to protect and preserve the biodiversity, integrity and population viability of wildlife. BLM actions should preserve the integrity of wildlife corridors, migration routes, and access to key forage.

The fundamental goal of the BLM's Resource Management Plans should be to keep this system whole and functioning. In damaged areas restoration should be the highest priority. In other areas protection of key values and resources should be the highest priority.

The Bruneau RMP lands include large expanses of native sage-steppe habitat critical to sage grouse, migratory birds and other wildlife. They also include spectacular wilderness study areas that contain unique geological and cultural sites as well as proposed Wild and Scenic River areas.

Despite Congressional protection, the Birds of Prey area has suffered widespread habitat loss and degradation under "multiple use" management. Raptor populations, including prairie falcons and golden eagles, are plummeting. This is due to habitat loss and fragmentation caused by fire and livestock grazing. Cheatgrass and weeds are taking over this once-flourishing sagebrush country. Roads and ORV trails are proliferating.

The focus of the new RMP for this area must be protection and restoration of native plant and wildlife communities. Ecologically and economically, continuing livestock grazing in the Birds of Prey NCA, or anywhere in the western United States for that matter, makes no sense, ruins our public lands, and is not in the public interest.

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3020

Third, the new land use plan needs to contain a thorough discussion of the monitoring by which assessments in the second step were made, and how they will be made in the future.

BLM should develop a wildlife specific monitoring plan to monitor the status of wildlife populations and their habitat.

A detailed monitoring plan should be developed and implemented to track and address increased impacts from motorized use associated with new Air Force emitter sites and other Air Force facilities.

The plans should describe how resources and objectives will be monitored and evaluated.

BLM should address how the plan will be updated and management changed based on new information gained from monitoring and evaluation.

3030

Foster scientific inquiry to enhance resource management and public education. . . . The BLM should support and encourage scientific study, consistent with the objectives of protection and preservation of the cultural and natural resources within these areas.

Suitability for all activities needs to be evaluated to ensure the resource area improves in ecological site condition (e.g., livestock grazing may not be suitable in locations due to precipitation, soils, terrain, etc.).

There is also high current and potential value of these lands as reference sites in scientific research, and as an unfragmented ecosystem for species restoration and long-term population viability.

Pursuing environmental perfectionism is not an equitable goal for management of public lands. We request that the impact of environmental perfectionism on the human environment be evaluated and that the cumulative impact of environmental perfectionism on the human environment be adequately considered.

We request that guidelines be developed to help determine if perceived impacts are significant or insignificant. All measures of perceived impacts should be compared to natural levels of activities over the course of time to test for significance. A significant difference (sense of magnitude required) should be required before a perceived impact can be identified as significant.

Agencies are encouraged to provide good statistics on the level of use by the various public land visitors and use these statistics in the decision processes.

3040

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- General Process/Other: In the case of MFP failures analyze why and propose more aggressive approaches to close on objectives in a shorter period of time.
- Resource objectives should state goals that are quantitative in both scope and timing (e.g., livestock grazing will be managed to achieve 75% or more lands in later seral stage within 20 years).
- Interim improvement goals should be established for the duration of the RMP. Recommendation is that progress is reviewed at least every five years for major metrics. If substantial progress has not been made toward the interim goal, then new additional measures must be taken to meet the long-term RMP goal.
- 3050
- Concerned about trash and illegal dumping on public land. Need to have a carry in and carry out policy with trash disposal area.
- Detect, confirm, and stop all unauthorized use on public land.
- Increase law enforcement actions to reduce the amount of illegal disposal of hazardous and non-hazardous wastes on public lands.
- 3060
- Each EIS must also include a cumulative impacts analysis. . . .Thus, BLM must consider the impact of any proposed changes to land management, as well as the combined impacts from other activities that may impact the same resources.
- We are greatly concerned about the significant cumulative impact associated with the reduction of multiple-use and OHV recreation opportunities. We are opposed to any proposed action that further contributes to this cumulative impact on multiple-use and OHV recreationists.
- The cumulative effect of wilderness designations, roadless designations, travel management, wildlife management areas and other restrictive management designations over the past 30 years have reduced the national forest area readily available to over 90% of the citizens to less than 42% of the total national forest area.
- We request that this cumulative impact be addressed by the collection of data and the fair evaluation of the need for motorized access and motorized recreation.
- We request an adequate evaluation of the cumulative loss in miles, acres, and quality of motorized recreation and access opportunities within public lands as required under . . . National Environmental Policy Act.
- We request that the cumulative impact of all statewide-motorized closures on all of these visitors be included in the environmental document.

**Comment Code****Comments**

We request that the cumulative effect of reduced recreation and access opportunities for motorized visitors within the project area be adequately considered in document and decision-making.

The cumulative effect of eliminating motorized access to loop trail systems and destinations outside of the project area should also be adequately considered in the document and decision-making.

We request the evaluation of the cumulative impacts from management goals that tend to concentrate visitors to narrow corridors and reduce recreation opportunities for motorized visitors. Other associated negative impacts that should also be evaluated include loss of dispersed recreation opportunities, reduced quality of recreation, loss recreation diversity, and unequal allocation of recreation opportunities.

We request evaluation of all past motorized closures and road and trail obliterations done as part of timber sales and the cumulative impact of those closures on motorized access and recreation.

We request that the needs of motorized recreationists for regional and national travel ways be evaluated. We request an evaluation of the cumulative impacts and environmental justice issues surrounding the lack of regional and national motorized trails for motorized recreationists. We then request that regional and national motorized trails be identified and actions be taken to implement those trails.

3080

Riparian: Do not want birds of prey area expanded in size

All BLM land or public land needs to be clearly marked, like National Forest.

You have ignored the state lands and especially the private lands within your RMP. The RMP now states "...and covers approximately 1.8 million acres are administered by BLM and 145,000 acres are included in the Duck Valley Indian Reservation." p.2 line 9

We suggest that the boundaries of the Birds of Prey NCA be re-examined and cleaned up to clarify any confusion that exists between the management of the NCA and that of other land, be it BLM or private.

The plan at this point should focus on managing within the currently approved boundary. Any part of the plan to change the existing boundaries will require approval from Congress.

BLM further encouraged public support for excursions beyond the limits by indicating specific planning issues that cannot be completed without action by the Congress. . . .BLM indicates an intent to address the issue of boundary changes for the NCA. BLM personnel are aware that no such boundary change may be accomplished as the result of this planning effort since a change of the current boundary requires an act of the Congress.

**Comment Code****Comments**

3090

We believe there should be alternatives that address options for improving both the configuration of the boundary and the land pattern.

Recreation: Provide better maps for public use

General Management: Help support public uses with technology, (e.g.. GIS-how does BLM want it done? Topo maps us using technology) Need a consistent map format.

Provide approved Equestrian, Motorcycle and ATV trails maps to individuals upon request

There are two recent RMP efforts that the BLM should review for their presentation of information. One is the Owyhee RMP. This document is reasonably clear, and provides a very helpful summary table that often quantifies differences between alternatives, has some set standards to be met by management, and has text discussions that are relatively easy to follow....In horrible contrast to the ORMPs clarity on specifics is the Vale BLM's proposed Southeast Oregon RMP, which is run-on-sentence after run-on-sentence of incomprehensible gibberish.

We believe you need to produce at least as many maps explaining land management as appeared in the ORMP. However, the Bruneau maps need to be more detailed, and provide ready geographic frames of reference so that a reader can more easily orient in themselves on land marks such as drainages, and understand locations.

We ask that you include a map that shows allotments held permittee-by-permittee (lumping all the various Simplot entities into a "Simplot" category).

the public and the users of the resources have the right to expect that the best scientific data will be collected and used in the current and future assessments of progress toward achievement of objectives.

The BLM should create a map designating the classification of each known route and trail in the resource area. Classification of routes should be based upon agency regulations which guide the definition and classification of routes/trails.

The maps used in the environmental document should be familiar and easily interpreted by all citizens. . . .Many visitors who traditionally use roads and trails in the project area may not comment during travel management process unless they understand which roads and trails are proposed for closure.

We recommend that the Travel Plan Map and Visitors Map be the same and that this combination map should include as much detail as possible ( such as contour information) so that the public can better determine the location of roads and trails that are open or closed.

The maps and figures should be easily understood.

**Comment Code****Comments**

- Agencies are encouraged to make Travel Plan maps more readily available. Vending machines could be placed in areas that are accessible at any time of the day or week at BLM and FS offices.
- Agencies are encouraged to publish all Travel Plan maps in the same format and in an easy to read format. The Travel Plan map and Forest Visitors map should be the same. All visitors need to clearly understand what areas, roads or trails are open for motorized travel and what areas, trails, or roads are closed to motorized travel. Current maps lead to misunderstandings from both non-motorized and motorized visitors.
- use their 1:100,000 scale land status map as part of the WSA and ORV information by printing the ORV routes and Wilderness Study Areas on the maps.
- 3110 Riparian: Total enclosures of streams and creeks will not ensure a balanced ecosystem-some grazing is necessary for wildlife and weed control for beneficial use by all creatures.
- DEQ is concerned about smoke emissions...The Federal Wildland Fire Management Policy and Program Review Implementation Action Plan Report (May 1996) calls for an expanded program to reintroduce fire in fire-dependent ecosystems. This may mean a ten fold or more increase in the use of wildland and prescribed fire. EPA regulations and policies have increased the need for managing fire emissions.
- 3120 BLM's analysis of air quality must take into account the growing offensive and intrusive stench of the air from the Simplot feedlot in Grand View polluting wild lands air in the Owyhee Front, lower Jacks Creek, and lower Bruneau Canyon country including WSAs.
- 3130 BLM must monitor air quality in WSAs and other wild lands, and work with DEQ and EPA to remove causes of such pollution.
- 3140 Manage WSA and Section 202 study lands as Class I designated geographical areas with respect to meeting or exceeding Prevention of Significant Deterioration regulations so these areas will remain substantially natural in character, and support general wilderness values.

**Comment Code****Comments**

- The EIS should include a description of the smoke management program that will be followed. An air quality analysis should include: PM10 and PM2.5 emission estimates; smoke sensitive areas; predominant meteorological patterns; smoke monitoring procedures; emission and smoke impact reduction techniques; public notification process; mitigation actions during smoke intrusion episodes; alternatives to burning considered and used; and coordination with other burn activity.
- 3210 The Forest Service Stream Systems Technology Center has found, in a paper published in the July 2000 issue of Stream Notes, that roads and trails can easily be hydrologically disconnected from streams. Therefore, the sedimentation concerns can be easily mitigated and should not be used as a reason to justify motorized recreation and access closures except in significant cases that cannot be adequately mitigated.
- 3220 The BLM should develop a strategy to ensure that the appropriate quality and quantity of water resources are available for protection of resources through management of uses. A monitoring program should be developed and implemented, and BLM should pursue options for assuring water availability.
- 3230 We have been collecting water quality samples on springs, seeps and headwater streams on BLM lands in the LSRD, including the BRA. Coliform and fecal coliform levels of hundreds of thousands are common. Sadly, it is precisely these areas that are critical to declining species such as sage grouse, and to pronghorn antelope who are forced to drink what is essentially a brine of liquid livestock feces, urine and mud.
- BLM must assess the effects of pollution of BRA waters on recreational uses, and on aesthetics.
- Establish metrics for the presence of cryptobiotic crusts to reduce erosion, insure nutrient cycling, and re-establish basic functioning ecological processes.
- As part of its inventory, the BLM must collect information on water quality issues in the planning area. This includes general trends in water quality, . . .It should also include information on what rivers are out of compliance with water quality standards, whether or not they are listed under section 303 (d) of the Clean Water Act. . . .The inventory should look at what activities are impacting water quality and how those impacts can be stopped and/or mitigated.
- 3240 Minimize soil erosion caused by surface disturbing activities through proper timing with regard to soil moisture content and range readiness. Eliminate consideration of livestock range projects for areas sensitive to soil compaction.

**Comment Code****Comments**

- 3245 Prevent new and control existing surface disturbing activities on soils with high or very high erosion hazard rating.
- BLM must provide for compliance with water quality standards with definite triggers and responses to water quality problems that are clearly spelled out in the RMP.
- Develop goals for interim progress in reductions of accelerated soil loss. Review on five-year intervals. If progress is incompatible with reaching the reductions in accelerated soil loss goals in the allotted time, implement more aggressive adjustments in the causes of accelerated soil loss. Publish the evaluation/plans to public.
- The new RMPs should include strong direction to protect water quality, based on this water quality inventory. Direction in the RMPs should be directed at maintaining compliance with water quality standards, including protection of beneficial uses, maintenance of numeric and narrative criteria, and compliance with the anti-degradation standards. Direction in the plan should include requiring permit conditions to protect water quality and limiting or prohibiting activities that are causing water quality degradation.
- 3310 Riparian: Seek cooperative opportunities to address diminished and altered riparian communities specifically in vicinity of CJ Strike (cooperate with National Guard, IDFG, pvt. landowners and permittees pvt. Companies)
- Riparian: Cooperative monument efforts on private/BLM/state lands
- Riparian: Look for efficiencies in management by cooperatively using BLM /SCS expertise.
- Recreation: preserve streams and rivers for fishing
- 3320 Riparian: The creeks, streams, are all brushed in where grazing is not allowed. So? Who can get to the water? Take your brush cutter.
- Livestock grazing is the primary (and often the ONLY) cause of water quality degradation in the BRA. Livestock grazing causes watershed destruction ranging from desiccation of headwater springs and seeps to down cutting and gulying of streams resulting in rapid runoff and limited water storage.

**Comment Code****Comments**

- There are populations of bull trout and redband trout in the Bruneau and Jarbidge Rivers and their tributaries. As the Idaho Department of Fish and Game (IDFG) notes in its fisheries management plan, water quality and livestock grazing have had significant negative impacts on native fish. Migration barriers are also a significant problem. The new RMPs must address all of these problems.
- Siltation from road building, grazing and mining smothers spawning beds, fills in pools that serve as critical over-wintering habitat for fish, and alters macroinvertebrate populations that serve as an important food sources for fish. The new RMPs should strictly limit such activities in known spawning areas, and prohibit them in areas that are highly susceptible to landslides.
- 3330
- Riparian: Consider impacts to uplands from riparian mgt  
Riparian/Streams/Fisheries: What determines the size or riparian areas?  
Riparian: What determines the size of riparian areas?  
BLM must collect baseline water quality data on springs, seeps, streams and other riparian areas during periods of the year when livestock are present, and/or runoff is occurring, as part of this process. This is necessary to allow up-to-date and informed decision making on compliance with state water quality standards and the CWA, and much-needed additions to the 303d list.
- All wetlands, riparian areas and seasonal intermittent streams and playas should be evaluated to assess whether they are in properly functioning condition and outline restoration or management changes necessary to achieve functionality. The BLM should incorporate biotic and ecological indicators into its Riparian PFC assessments. Current PFC Assessments are inadequate because they only cover physical (hydrology and soils) components of the system.
- 3340
- Riparian: Plan create 50-100 acre area of protection around all riparian areas and vernal pools. Don't let cows in.  
Riparian: when closing riparian areas, provide off site watering  
Riparian: Create riparian pastures not exclosures with grazing management because potential fire ( hot fire) will kill all vegetation creating a disaster  
Riparian: Grazing needed in riparian areas to keep trails open for recreation- i.e.. Fishing  
Riparian: We need a high dam on the Bruneau River at the Idaho Nevada Line

**Comment Code****Comments**

Riparian/Streams/Fisheries: Need every water hole you can get in the desert. If you (BLM) keep fencing off water holes, you create more pressure on the ones left. Need to expand water opportunities.

Riparian/Streams/Fisheries: Direction to pump and haul water is impractical- hard to do in desert/mountainous areas

Vegetation: Use exclosure to restore riparian areas. Habitat improvement use native grasses to provide nesting cover.

Riparian: Keep cattle out of all streams, in all seasons.

Riparian: Fence stream sides to remove cattle during critical nesting periods to ensure residual nesting cover available. Leave water corridors.

Riparian: Manage riparian areas to restore to fully functional and manage adjacent uplands for upland game reproduction. Protect and restore seeps or wet meadow as sage grouse brood rearing areas.

Riparian: Close sensitive areas of streams to camping.

Riparian: Manage damaged areas similar to Silver Creek (by Hailey)

Wildlife: Revegetate stream sides with willows- will stabilize banks, narrow channel, maintain cover, increase grazing- maintain them with exclosures. Better fire suppression in sagebrush areas.

Please stop the stocking of cattle in the Bruneau River and along the tributaries and rivers of the Owyhee Drainage.

Roads, trails and recreation facilities should not be placed in riparian or other similar areas. BLM should evaluate if such existing roads, trails and other developments are effecting the health of the area, and if they are the existing facilities should be closed, rehabilitated and relocated (if necessary).

Protest all water right applications which would degrade or adversely affect fisheries habitat on BLM administered lands.

Implement streambank stabilization projects with native plantings in areas with high/very high erosion potential.

The RMPs should also address habitat fragmentation on the Jarbidge River. This should include requiring removal of man-made migration barriers or requiring adequate fish passage structures on all new and existing dams, diversion dikes and culverts.

The new RMPs should prohibit the stocking of competitor species in known bull trout streams, and establish management guidelines that encourage control or elimination of competitor species. Non-native fish should not be stocked in rivers, streams or lakes that contain fish, amphibian and other animal and plant species that are federally protected.

3345

**Comment Code****Comments**

Watershed Objective 1 . . .The new Bruneau RMP should address this in conjunction with RM-1. . . .achievement of Range Management Objective 1 would result in the simultaneous achievement of Watershed Objective 1 (if retained in the new plan separately from RM-1).

WS-1.1. . .The Bruneau RMP needs to address this issue with a similar objective. Note that in some instances this will require land treatments as discussed under Range Management Objective 2. . . .The new plan should also provide for flexibility in adopting this objective in AMPs or their functional equivalent, so that allotment-specific objectives may provide for utilization higher than 50% at the end of the grazing season on native range, and utilization higher than 50% in non-native seedings (particularly if deferred, deferred-rotated, or rest-rotated).

WS-1.2. . .The Bruneau RMP needs to address this issue with a similar objective. However, the new plan should explicitly recognize that soil erosion is a natural phenomenon and, if verbiage such as "minimize" is used, it should at least refer to "minimizing above natural threshold levels" for the existing successional status and particular ecological site.

Wildlife-aquatics Objective 2. . .The new Bruneau RMP needs to address this issue with a similar objective, but needs to identify the specific areas of fisheries. Streams which were identified in the Bruneau MFP for "fisheries" values, which have not fisheries, should be eliminated from the new plan. This includes Birch Creek in the East Castle Creek Allotment. Associated MURs should be reevaluated with respect to the following points: The full range of management actions, . . .may be available and should be considered. Streams should not be considered fisheries habitat if such habitat is reliant upon the quantity, quality, and/or duration of water flows that are under the control of, or are a part of, a legally permissible irrigations system held by a private interest. . . .Streams or portions of streams which intermittent or ephemeral should not be considered as potential fisheries habitat.

Watershed Objective 1 . . .The new Bruneau RMP needs to address this issue with a similar objective. . . .achievement of Range Management Objective 1 would result in the simultaneous achievement of Watershed Objective 1.

WS-1.1 . . .The Bruneau RMP needs to address this issue with a similar objective. Note that in some instances this will require land treatments as discussed under Range Management Objective 2.

WS-1.2 . . .The Bruneau RMP needs to address this issue with a similar objective. Determinations as to proper timing of use for a given pasture, area, or grazing allotment should be made through AMPs or their functional equivalent.

Wildlife-aquatics Objective 2 . . .The new Bruneau RMP needs to address this issue with a similar objective.

**Comment Code****Comments**

WL-aq-2.1 . . . This MUR should be reevaluated with respect to the following two points: 1) The MUR's statement that grazing exclusion is the only practical method to accomplish fisheries habitat improvement should be removed because other practical methods may be available and should be considered. 2) Streams should not be considered fisheries habitat if such habitat is reliant upon the quantity, quality, and/or duration of water flows that are under the control of, or are a part of, a legally permissible irrigation system held by a private interest. Such streams are part of legally permitted water conveyance systems and should therefore not be considered fisheries habitat. All Streams within the Riddle Allotment that are located below the Ranch's irrigation reservoirs should not be classified as existing or potential fisheries habitat for the reason discussed above and because these streams would primarily be intermittent streams incapable of supporting fisheries if it was not for the irrigation storage provided by the reservoirs. The only stream reach within the Riddle allotment that should be considered as potential fisheries habitat is that portion of Blue Creek lying above Blue Creek Reservoir up to the Ranch's private land to the north. All other streams within the Riddle Allotment above the Ranch's irrigation reservoirs are intermittent in nature and should not be considered potential fisheries habitat. See Exhibit A for a map showing the approximate location of a Blue Creek Riparian fence proposed by the Ranch to meet the existing Objective and MUR regarding fisheries habitat along Blue Creek.

WL-aq-2.2 . . . See comments to WL-aq-2.1 above. The Ranch believes that the above listed objectives and management guidelines with the Ranch's recommended modifications should be carried forward into the Bruneau RMP and are consistent with applicable law.

Establish self sustaining native fisheries in all existing and future reservoirs of appropriate size.

The RMPs must adequately protect riparian and wetland areas, riverine ecosystems, water quality, aquatic species, and Wild and Scenic eligible or suitable rivers.

the new RMPs must include adequate standards to protect and recover bull trout and to ensure that bull trout are not jeopardized.

the new management plan should establish bull trout temperature guidelines and prohibit any activities that are likely to result in increased stream temperatures.

3400

It is our observation that many of the Owyhee Front canyons have large numbers of nesting raptors. It is likely that some raptors displaced from the BOP because of habitat loss are now using the Owyhee canyons. . . . it is imperative that BLM act decisively and quickly to protect Owyhee Front native vegetation - in the Bruneau RMP process, and in implementation of, and amendments to, the Owyhee RMP.

3410

**Comment Code****Comments**

Vegetation: Litter concerns

Vegetation: Less cattle forage plants, more wildlife forage plants

It is important that plans be current and address pressing issues such as fire rehabilitation and conservation of sage steppe habitats.

We refer BLM to Professor Debra Donahue's excellent recent book *The Western Range Revisited*. . . .and ask that you incorporate it as part of our comments.

We refer the BLM to Professor Debra Donahue's excellent recent book *The Western Range Revisited*. This book describes and catalogues the loss of biodiversity, exotic species, soil erosion, and water pollution, and ask that you incorporate it as part of our comments.

3420

Vegetation: Control (stop) the illegal cutting of junipers, pines, in Owyhees (Delamar Area) "wagon-team"

The protection, enhancement and restoration of native sagebrush plant communities including: Wyoming big sagebrush, Basin big sagebrush, mountain big sagebrush, big sagebrush-bitterbrush, big sagebrush island/inclusions in low sage brush, and the various low sagebrush communities - should be the basis driving management decisions in this RMP effort.

Until BLM reckons with livestock grazing ---terminating livestock use on wild lands and allowing appropriate recovery periods, use of fire further jeopardizes native plant communities.

The plan will address the adverse impact of Juniper invasion as one of the most significant adverse agents on the health of rangeland and riparian areas.

The Bruneau RMP must focus on protection of an intact landscape of sagebrush plateaus and canyon lands to provide unfragmented core habitat for rare plants and intact sagebrush and saltbrush-steppe communities (as well as for sage grouse, sagebrush-obligate migratory birds, raptors, pygmy rabbit, and other sagebrush obligates such as pronghorn).

The protection, enhancement and restoration of native sagebrush plant communities including: Wyoming big sagebrush, Basin big sagebrush, mountain big sagebrush, big sagebrush-bitterbrush, big sagebrush island/inclusions in low sage brush, and the various low sagebrush communities - should be the basis driving management decisions in this RMP effort.

**Comment Code****Comments**

3430

The vegetation on the NCA is in deteriorated state, consisting for the most part of introduced annuals on the plains and mesas. We also concerned with state of the bottom lands and riparian zones near the river where undesirable exotics occur. We believe the planning alternatives should address how this problem will be remedied.

-Consider a full range of rehabilitation techniques; management mechanical and chemical.

-Consider all available vegetative plant material to replace the existing undesirables including adaptable exotics as well as desirable native species.

-SRRV would like to see consideration of ways to provide a source of local shrub plant materials for planting on deteriorated sites on the NCA. Planting of sagebrush and other native seedlings would enhance the habitat and provide excellent opportunities to for volunteers to become involved in the NCA.

Focus the RMP on protection and restoration of native plants communities and rare plants like slickspot peppergrass. This is essential to support a prey base for thriving populations of birds of prey.

BLM must conduct a current inventory of native plant community condition and restoration needs.

BLM must recognize values of western junipers as native tree species. In areas where junipers may be thought to be increasing, BLM must collect site-specific data to verify this information. BLM must determine first - does an "invasion" really exist? . . .If an "invasion" actually is occurring, why is this?

Please review Joy Belsky's excellent peer-reviewed scientific articles on western juniper (Belsky 1997), and livestock as a causal agent of "doghair thickets" of trees in forests due to the stripping/destruction of understory vegetation (Belsky and Blumenthal 1997).

Juniper control practices must be performed in a manner giving priority consideration to its regional habitat variation. Including elevation and topographic density variances with regard to where junipers historically prefer to grow. The oldest junipers growing at intermediate elevations must be considered within their preferred habitat range. These woodland stands should be off-limit to chaining or controlled burns. The younger stands occupying lower elevations can be considered for suppressive management. Whether by controlled burns or chaining the newly formed range must be re-planted immediately with native grasses and herbs beneficial to wildlife as well as livestock. These areas should be done in small patches of several hundred to a few thousand acres and the replanted range must then be given a minimum of three to four years rest before livestock grazing can resume.

BLM should use available data to outline the status and distribution of the vegetative communities within these landscapes, and develop a plan to monitor vegetation to assess whether it is meeting desired conditions.

**Comment Code****Comments**

3440

The BLM must identify lands to be restored to native vegetation. These restoration areas include, in priority order: all livestock-damaged native communities, including wetland and riparian areas; degraded (e.g., cheatgrass areas) that are islands within, edges of, or form connections between, areas of intact native vegetation areas; annual exotic communities; and exotic seedings.

BLM must recognize values of western junipers as native tree species. In areas where junipers may be thought to be increasing, BLM must collect site-specific data to verify this information. . . .If an "invasion" actually is occurring, why is this? . . . What actions will the BLM take to heal these damaged sites before undertaking any efforts at juniper control? . . .Please review Joy Belsky's excellent peer-reviewed scientific articles on western juniper (Belsky 1997), and livestock as a causal agent of "doghair thickets" of trees in forests due to the loss of understory vegetation (Belsky and Blumenthal 1997).

Wildlife Mountain Home, (Rattlesnake Junction): Cheat grass control, restoration of forbs and sage brush, travel plan- stay on established roads and trails

Vegetation: Replant with native grasses

Vegetation: No burning of junipers

Vegetation: Should revegetate after fires with vegetation that suppresses cheatgrass.

Vegetation: Use native plants- especially sagebrush

Vegetation: Restore old burn areas with sagebrush to link up sagebrush areas

Vegetation: Establish large cow-free areas to protect sage brush and rare plants + salt desert shrub veg. Large land areas are needed to protect from weed-invasion, fragmentation.

Vegetation: Exclosures to protect vegetation are often a waste of money as they have a half-life of 3-5 years before they are substantially violated. Exclosures without a cooperative/alert permittee, frequent "agony" surveillance, timely reconstruction of weak sections, over one or two decades really do nothing to improve the resource needing protection.

Vegetation: Use grazing for fire suppression eliminating fuel load. Junipers ought to be logged. They make great fence posts.

The first step in any restoration throughout the BRA lands is removing livestock grazing to enable establishment of fragile native species and/or recovery of native understories.

Only native seeds must be used in all restoration, and in all post-wildfire seeding.

**Comment Code****Comments**

Fire, at present, is NOT an appropriate restoration technique in BRA lands. The looming threat of exotic species invasions following site disturbance such as fire makes playing with prescribed fire a very dangerous undertaking.

Any juniper "control" must be done by selective hand-cutting of trees with the entire felled tree left in place. This method is selective, leaves all nutrients on site, and the structure of the felled tree helps to trap moisture on site, and provides suitable micro-habitats for native species establishment.

Only native species should be used in any post fire seeding effort - or in any seeding effort (such as road rights-of-way, areas where cow troughs are removed, etc) in BRA lands.

and Development of a restoration plan for native flora and fauna.

Native plants should be used in all restoration and revegetation projects. BLM should develop adequate, reliable and available native seed sources.

Identify and protect old growth juniper from deliberate and accidental destruction.

Identify and protect old-growth juniper from deliberate destruction.

Manage native perennial range to maintain or increase the level of aerial cover and species diversity that is representative of a late seral stage; in part through reductions in livestock grazing and OHMV use.

The first step in any restoration throughout the BRA lands is removing livestock grazing to enable establishment of fragile native species and/or recovery of native understories. Only native seeds must be used in all restoration, and in all post-wildfire seeding.

Fire, because of the high risk of invasion by cheatgrass, is at present, NOT an appropriate restoration technique in BRA lands.

Use only native species for revegetation.

The BOP is the perfect place to try out all kinds of experimental "restoration" techniques. It is so badly damaged at this time, that in many places it is impossible to make things worse.

3445

The BLM should establish a goal of management for a natural range of native plant associations. Any activities should not be allowed to significantly shift the makeup of those associations, disrupt their normal population dynamics, or disrupt the normal progression of those associations. Goals should be set for desired conditions of the different vegetation types and restoration of areas from non-native species to native species.

**Comment Code**

**Comments**

Most importantly, the BLM should manage these areas to maintain and restore the large expanses of unbroken sagebrush and other native shrubs and grasses that are so vital to the overall health of the region and its species.  
Manage native perennial range to limit soil loss to a sustainable rate as identified through the use of appropriate predictive methods.

The BLM must PROTECT all remaining native vegetation communities from activities that result in disturbance, and resulting proliferation of exotic species.

Any juniper eradication areas must be replanted with native species and lay fallow for a minimum of two years after eradication. No old growth juniper, and no juniper from the mid-elevation range should be removed.

3510

Wildlife: Cheat grass  
Vegetation: Cheat grass bad

3520

Vegetation: Weed control in various areas is needed-thistles and skeleton weeds are encroaching  
Vegetation: Need more effective control of junipers and other noxious and dangerous plants.  
banning cross-country travel by ORVs and closing jeep trails in lands "at risk" for weed infestation are logical ways to limit vehicle transport of exotic species seeds.  
Noxious weeds are a big problem, especially in the Birds of Prey Area where cheatgrass has taken over large tracts of land. I wonder if continued grazing in this area is hastening the weed invasion? It sure looks worse than it did 30 years ago.  
BLM must make the control of noxious weeds a top priority and prevent their spread as well as the introduction of new invasive species.  
The BLM must take all possible measures to prevent the spread of weeds into intact native vegetation communities in the BRA. The BLM must fully recognize the fact that domestic livestock are the primary cause of weed infestation on BRA lands.

3530

BLM must identify lands to be restored to native vegetation. These include: exotic seedings, annual exotic communities, all livestock-damaged native communities.

**Comment Code****Comments**

BLM must identify lands within the BRA that are currently "at risk" for weed invasion, and identify specific preventative measures that will be taken to prevent their spread.

The BLM must identify lands within the BRA that are currently "at risk" for weed invasion, and identify specific preventative measures that will be taken to prevent their spread. The BLM must specify actions that will be taken to prevent infestation . . . Vehicles are also a source of weed transport, so banning cross-country travel by ORVs and closing jeep trails in lands "at risk" for weed infestation are logical ways to limit vehicle transport of exotic species seeds.

We request that the document make a fair evaluation of all sources that contribute to the noxious weed problem including hikers, mountain bikers, and equestrians. The document should also fairly evaluate how natural processes and wildlife spread noxious weeds. The document should include a balanced discussion of the noxious weed problem. The discussions, decisions and measures used to mitigate noxious weeds should be applied impartially to all visitors.

3540

Vegetation: Use grazing for cheat grass control. Graze in winter and early spring to protect native plants.

I like the current recommendation of weed seed free hay but would not like to see it go mandatory. The hay I normally use is not certified but does not have weeds- I would not feed that to my horses in my pasture. What I use is a better quality than any certified hay that I must buy for use in the National Forests.

First and foremost, BLM must PROTECT all remaining native vegetation communities from activities that result in disturbance, and resulting proliferation of exotic species.

Specific areas to be restored to native vegetation: ALL crested wheatgrass seedings including crested wheatgrass seedings near Triguero Lake; crested wheatgrass seedings in Castle Creek allotments on the Owyhee Front, crested wheatgrass seedings in the vicinity of Poison Butte and Grasmere. In addition: the degraded lower elevation salt desert shrub/Wyoming big sagebrush communities with cheatgrass understories, wet meadow complexes and springs and seeps throughout the BRA, aspen groves and livestock-degraded understories in upper Sheep Creek, western juniper communities with livestock-degraded understories in Rock Creek, Deep Creek, etc.

BLM must specify actions that will be taken to prevent infestation - such as closing pastures or allotments to all grazing until weed infestations are under control.

3541

Vegetation: control the cheat grass

**Comment Code**

**Comments**

- 3620 BLM must take all possible measures to prevent the spread of weeds into the fairly intact native vegetation communities in the BRA.
- 3630 At least 20 taxa of rare plants, tracked by the Idaho Native Plant Society and Conservation Data Center as species of conservation concern, occur on the Front. Numerous rare plant inventories have been conducted in the area, from which much information on populations, habitats, threats, and ecology has been gained. The steadily increasing use of off highway vehicles (OHVs) is often recognized as the main threat to rare plant habitat on the Owyhee Front. . . .The impacts of all activities on rare plants should be thoroughly analyzed and alternatives chosen that reduce or eliminate these impacts.
- 3640 General Management: Additional areas on the sunny side spring- fall range need to be studied to identify locations of lepidium....  
for most of the Owyhee Front (especially south of Oreana), the ecology of both plant communities and rare plants occurring in Salt Desert Shrub vegetation has not been thoroughly studied. . . .The BLM must collect adequate baseline biological data on vegetation in the BRA lands. This will require a minimum of two years of intensive effort. Data must be collected here in developing the RMP to which NEPA documents for the next decade or more will be tiered.  
BLM must identify all known or potential slickspot habitat, and act to immediately remove livestock from these area. This can be done with a Full Force and Effect closure decision as soon as this information is assembled. Given the rate of habitat loss, BLM can not continue grazing these sites while the RMP process runs its course.
- 3645 Vegetation: Fence off endangered plants  
BLM must also protect rare and endemic plant communities, cultural sites, paleontological sites.  
Protection and restoration of the native and rare plant communities which are essential in supporting a prey base for thriving populations of birds of prey;
- 3645

**Comment Code****Comments**

The BLM should establish goals to ensure the protection of and recovery of threatened, endangered, sensitive and special status species. BLM should designate critical habitat for every endangered, sensitive, threatened and special status species. These habitat areas should be managed with the species survival and recovery as the highest and most valuable use. The BLM should look at all options for protecting activity centers through special status land designations, including, but not limited to, Areas of Critical Environmental Concern, Research Natural Areas, Outstanding Natural Areas, Wilderness Study Areas, Suitable Wild, Scenic and Recreational River miles, or other administrative designations. Specifically, the BLM should consider designating special management areas for sage grouse and other sage obligate species, slick spot pepper grass, red band trout, spotted frogs, bats and many of the other bureau and CDC identified species. . . . BLM should also identify conflicts with species recovery and manage visitation and use by limiting activities and closing certain areas to prevent impacts to sensitive species.

Increase the population levels of Federal and State designated threatened, endangered, candidate, or sensitive species to levels where their existence is no longer threatened and there is no need for Federal or State listing.

Livestock grazing management practices will be established which ensure the recovery of threatened or endangered species, prevent species listed by the US FWS or NMFS as category 1 or 2 from becoming threatened or endangered, and prevent other species from being considered for listing as under the Endangered Species Act.

3710

Wildlife: Improve habitat for wildlife, less concern for cattle, ( junipers native grass, sagebrush, less fires)

Address loss of habitat and Wildlife

I feel the Birds of Prey Area is very special, probably the most important area in your district for raptors, and certainly one of the most beautiful.

Management of public lands to maximize wild game populations at the expense of other uses is not reasonable and does not meet the requirements of multiple-use laws and policies.

3720

Wildlife: Conversion of perennial grass/shrub to annual grass and annual grass shrub- generally detrimental to variety of wildlife species

Wildlife: Heavy grazing of winter fat diminishes plant vitality, possibly negatively capacity wildlife species

Wildlife: Road access/use may be limiting some use of habitat by wildlife species

Wildlife: Raptor taking out good birds

**Comment Code****Comments**

Wildlife: Need to have a balance between predators and food base. Birds of prey are overpopulating and eliminating a lot of small game.

Vegetation: Wildlife- development close to BLM and impacts on the raptors, recreation- access to the canyon for horse back riding, wildlife- concern about raptor population effects on game animals and game birds

Riparian: Enforce standards of use in unplanned seeps, meadows, springs because current use patterns leave no forbs for sage grouse broad rearing.

Wildlife: Keep raptors within the birds of prey boundaries and away from private and state lands there for eliminating raptors feeding on state birds and animals- including sage hens.

Loss of Prey Base for raptors in the NCA.

...Consider impacts of the emergency fire rehabilitation plans on mule deer habitats. Mule deer require substantial shrub components in their habitats. Timing, size and configurations of prescribed burns are important considerations for mule deer. Rehabilitation of wild fire sites is also critical to mule deer, in that shrubs must be brought back into the habitat as soon as possible.

Cheat grass invasions after fires are a significant problem for both sage grouse and mule deer and the RMP/EIS must address how the rehabilitation plans will impact this critical issue.

We encourage the BLM to be careful in constructing the policy for fire rehabilitation with regard to critical wildlife habitats....With wildlife habitats, what is beneficial to a particular wildlife species may not be beneficial to another species....One plan may not fit all situations.

...the RMP/EIS must be explicit in the criteria to be used to decide when and where prescribed fire will be used. If prescribed fire is used to manage wildfires, then it is important that guidelines for other land use activities such as livestock grazing be specified in the immediate time frames following the prescribed fire.

Achieving an ecological and managerial balance between productive and healthy wild land resources for native species and rangeland resources for livestock grazing is an important issue. At present, large areas of the NCA have been extensively damaged by wild land fires since the late 1970's. Replacing the native plant species, like the native shrubs and grasses, that provide crucial habitat for raptors' prey species, has been difficult due to the dry desert climate of the region. A reduction in crucial habitat can negatively impair prey species populations and consequently impair the raptor population of the planning area.

The BLM has acknowledged for several years the rapid decline of both the raptors and their prey base within this area. The BLM will need to keep its commitment to take a very serious look at the causes of these declines through this planning process.

**Comment Code****Comments**

3730

Wildlife: Determine areas of critical concern.

BLM must collect adequate baseline biological data on wildlife and vegetation in the BRA lands. This will require a minimum of two years of intensive effort. BLM never, ever does this in any other environmental analysis, and it must be collected here in developing the RMP to which NEPA documents for the next decade or more will be tiered.

BLM must fully consider the vast acreages needed by sage grouse for leks, nesting, brood rearing, and winter habitats. ACECs of sufficient size to include all the lands required by a population must be designated accordingly. We also ask that you work with the Forest Service and BLM of Nevada in this process - since BRA radio-collared sage grouse are known to move well into Nevada to spend late summers or winters.

The status and distribution of wildlife populations and habitats should be defined and updated using the variety of data resources available.

Important migration corridors between summer and winter ranges for wildlife should be identified and receive a high priority for protection and improvement. Minimize barriers to wildlife migration and movement by requiring modification of existing fences and construction of any new fences to meet current BLM wildlife fencing standards.

We would like additional information and an assessment of those key species identified - bighorn sheep, kit fox, river otter, ferruginous hawk, burrowing owls, mountain quail, white-faced ibis, sand creek long-billed curlew, elk, mule deer, pronghorn, peregrine falcon, bald eagle and other species for which BLM has established management goals.

3740

Wildlife: Don't allow hunting blinds for pronghorns

Vegetation: Reduce restrictions on ravens/crows to reduce predation on nesting birds like pheasants

Recreation: Eliminate permanent antelope blinds on water sources.

Wildlife: Maintenance of Battle Creek and Duncan Creek Enclosures. Complete inventory and identify sage grouse nesting and brood rearing areas. Initiate restorative action on marginal and degraded sage grouse habitat.

Wildlife: Identify and restore raptor habitats.

Wildlife: Monies collected from the Birds of Prey funds should be used to restore, develop, maintain, all other bird species including state of Idaho Protected game birds and the sage grouse.

Wildlife: Use grazing for cheat grass control. Sage hens cannot exist in cheat grass.

**Comment Code****Comments**

3745

Management tools should include seasonal and visitor restrictions to prevent impacts to wildlife populations from increased use and recreation.

Specific actions may include closing the entire area to visitation during critical times for raptor reproduction, elimination of all recreational shooting within the area and restrictions on military use of the area.

Important migration corridors between winter and summer ranges for wildlife will receive high priority for protection and improvement.

Minimize barriers to big game movement by modifying existing fences to meet current BLM fencing standards.

Wildlife Objective 2. . .The new Bruneau RMP needs to address this issue with more specific objectives. The new plan should identify the specific species to which this objective applies, identify the specific areas of the planning area where each species is known to (not "presumed to" or "believed to" or "might") exist, and identify the measurable habitat characteristics that management will be designed to achieve in the specific habitat areas for each identified species.

WL-2.1. . .The Bruneau RMP objective should be to manage habitat to maintain viable populations of the species of interest over time not to achieve a "population target" at any specific point in time. Specific habitat areas to be managed for bighorn sheep should be designated and the habitat characteristics important to bighorn sheep in each area should be identified and monitored. . . .Forage allocations for livestock should not be made as part of a wildlife habitat objective, but rather should be made based upon the guidelines discussed under RM-3.1 above. The MFP restriction on water developments in areas within 1-mile of bighorn habitat should not be carried forward into the RMP, as there exists no valid biological reason for such restriction.

WL-2.7. . .The Bruneau RMP should identify the specific riparian areas to which this recommendation will apply. Regardless of the livestock management practices applied, including total exclusion, the portions of streams located within the East Castle Creek Allotment would be marginal mountain quail habitat, at best. Therefore, any mountain quail habitat objectives or management guidelines carried forward into the Bruneau RMP should not be applied to the streams of the East Castle Creek Allotment.

**Comment Code****Comments**

Wildlife Objective 3. . .The new Bruneau RMP needs to address this issue with more specific objectives. A separate objective should be developed for each big game species of interest. In contrast to the MFP objective, the RMP objective needs to recognize that for some big game species (e.g. mule deer), "good" or "late seral" ecological habitat is not "good" big game habitat. The new RMP also needs to recognize that "good" big game habitat consists of a matrix of ecological sites and successional stages. . . .The new plan needs to recognize that the BLM's manualized procedures for determining "wildlife habitat suitability" do not recognize and account for the ecological potential of the ecological sites which may be contained within wildlife use area. Forage allocations for livestock should not be based upon "wildlife habitat", but rather should be made based upon the guidelines discussed under RM-3.1 above.

Wildlife Objective 4. . .The new Bruneau RMP needs to address this issue with more specific objectives. It should develop a separate objective for each upland game and waterfowl species of interest (or for assemblages of upland game and waterfowl species that have similar habitat preferences and requirements), delineate specific areas of public lands to which each objective will apply, and establish appropriate, measurable habitat characteristics, within and consistent with the potential of the site, to manage for and monitor with respect to each identified species or assemblage.

WL-4.3. . .The specific springs, seeps, meadows, and adjacent upland areas that are to be managed as key upland game habitat should be identified in the Bruneau RMP. Further, "overgrown" seeps, springs, and meadows have been demonstrated through research to be less desirable and less accessible to some species, such as sage grouse and bighorn sheep. The RMP should provide for a wide range of options dealing with springs, seeps, and meadows, and flexibility running the range of doing nothing to exclusion of springs. . . .Where issues of management alternatives cannot be resolved, and the permittees are willing, BLM should fence off such areas, including stream corridors, leaving water gaps or developing adequate upland livestock waters.

WL-4.4. . .The specific nesting, brood rearing, and winter habitat areas that are to be managed to benefit sage grouse habitat should be identified in the Bruneau RMP.

WL-4.5. . .The specific nesting and brood rearing habitat areas that are to be managed to benefit waterfowl should be identified in the Bruneau RMP.

Wildlife Objective 6. . .The new Bruneau RMP needs to address this issue with more specific objectives. The existing Objective is too general in nature. Specific meadow and riparian habitats to be managed for specific species of wildlife need to be identified and specific habitat characteristics necessary to support the wildlife species of interest need to be described within and consistent with the potential of the site. See general comments to Wildlife Objective 3.

WL-6.1. . .Any discussion within the Bruneau RMP dealing with these issues needs to be written to be consistent with the requirement under Range Management Objective 1 to manage native lands within the public domain to achieve a desirable mix of successional status stages.

**Comment Code****Comments**

Wildlife Objective 2 . . .The new Bruneau RMP needs to address this issue with more specific objectives. It should develop a separate objective for each sensitive species, delineate specific areas to which each objective will apply, and establish appropriate, measurable habitat characteristics that management will be designed to achieve in the specific habitat areas for each identified species.

WL-2.1 . . .The number of bighorn sheep that can reasonable be carried within the entire Bruneau Planning Area needs to be reevaluated in consultation with the Idaho Fish and Game Department to establish an appropriate potential population for the next planning cycle, a period of at least ten years. . . .the Bruneau RMP objective should be to manage habitat to maintain viable populations of the species of interest, not to achieve the population targets at any specific point in time. Specific habitat areas to be managed for bighorn sheep should be designated and the habitat characteristics important to bighorn sheep in each area should be identified and monitored. Forage allocations for livestock should be made based upon the guidelines discussed under RM-3.1 above.

WL-2.3 . . . The Bruneau RMP should identify the specific reaches of the selected creeks to which this recommendation will apply. Development and implementation of the discussed grazing systems and improvements should be made through AMPs or their functional equivalent.

WL-2.7 . . .The Bruneau RMP should identify the specific riparian areas to which this recommendation will apply. Regardless of the livestock management practices applied, including total exclusion, the portions of Big Jacks Creek and Shoofly Creek located within the Riddle Allotment would be marginal as mountain quail habitat at best. Therefore, any mountain quail habitat objectives or management guidelines carried forward into the Bruneau RMP should not be applied to these portions of Big Jacks and Shoofly Creeks.

Wildlife Objective 3 . . .The new Bruneau RMP needs to address this issue with more specific objectives. A separate objective should be developed for each big game species of interest. . . .The number of animals for each big game species of interest that can reasonably be carried within the entire Bruneau Planning Area needs to be reevaluated in consultation with the Idaho Fish and Game Department to establish appropriate potential populations for the respective big game species for the next planning cycle, a period of at least ten years. . . .the Bruneau RMP objectives should be to manage habitat in order to maintain viable populations of the species of interest, not to achieve population targets at any specific point in time. . . . Forage allocations for livestock should be made based upon the guidelines discussed under RM-3.1 above.

WL-3.1 . . .See the discussion under Wildlife Objective 3 above.

WL-3.2 . . .See the discussion under Wildlife Objective 3 above.

**Comment Code****Comments**

WL-3.3 . . .See the discussion under Wildlife Objective 3 above. Also, the Ranch believes that the area designated in the 1982 Bruneau-Kuna Grazing EIS as pronghorn winter habitat within townships T13S R2E, T14S R2E, and T14S R3E, all of the Boise Meridian and Baseline, is only used as winter habitat by pronghorn antelope for a short time in the earliest part of the winter in years with unusually mild weather. Therefore, the Bruneau RMP should not classify any of public land within these townships as winter range for pronghorn antelope.

Wildlife Objective 4. . .The new Bruneau RMP needs to address this issue with more specific objectives. It should develop a separate objective for each upland game and waterfowl species of interest (or for assemblages of upland game and waterfowl species that have similar habitat preferences and requirements), delineate specific areas of public lands to which each objective will apply, and establish appropriate, measurable habitat characteristics, within and consistent with the potential of the site, to manage for and monitor with respect to each identified species or assemblage. In many instances in the Bruneau Planning Area, upland game and waterfowl populations are already at or near the maximum levels that can reasonably be supported in the area. Therefore, in consultation with the Idaho Fish and Game Department, the objectives should identify the number of animals for each upland game and waterfowl species of interest (or assemblage of species) that can reasonable be carried within the entire Bruneau Planning Area. . .the Bruneau RMP objectives should be to manage habitat in order to maintain viable populations of the species of interest, not to achieve population targets at any specific point in time.

WL-4.3 . . .See the discussion under Wildlife Objective 4 above. The specific springs, seeps, meadows, and adjacent upland areas that are to be managed as key upland game habitat should be identified in the Bruneau RMP.

WL-4.4 . . .See the discussion under Wildlife Objective 4 above. The specific nesting, brood rearing, and winter habitat areas that are to be managed to benefit sage grouse habitat should be identified in the Bruneau RMP.

WL-4.5. . .See the discussion under Wildlife Objective 4 above. The specific nesting and brood rearing habitat areas that are to be managed to benefit waterfowl should be identified in the Bruneau RMP.

Wildlife Objective 6. . .The new Bruneau RMP needs to address this issue with more specific objectives. The existing Objective is too general in nature. Specific meadow and riparian habitats to be managed for specific species of wildlife need to be identified and specific habitat characteristics necessary to support the wildlife species of interest need to be described within and consistent with the potential of the site. See general comments to Wildlife Objective 3.

WL-6.1. . .See the discussion under Wildlife Objective 6 above. Any discussion within the Bruneau RMP dealing with these issues needs to be written to be consistent with the requirement under Range Management Objective 1 to manage undisturbed native lands within the public domain to achieve a desirable mix of successional status stages.

Current and future identified crucial habitat for big game species will receive a high priority in all multiple use decisions.

Make preservation of raptors and their habitat the first priority for the Snake River Birds of Pray National Conservation Area.

**Comment Code****Comments**

- I am very much in favor of preserving this area for wildlife.  
Make nesting raptor and their prey species the highest priority use in the NCA.
- 3830 Declines in Golden Eagle Pop. Prairie falcon pop. And burrowing owl pop.
- 3910 General Management: BLM needs to do their research and studies complete before making decisions on wildlife and habitat. Don't make up stuff.  
Riparian: Hardiman Springs areas near Triangle Idaho, the riparian enclosure completed about 10 years ago contains no spotted frog species. The Culverts on both sides of the county road have been maintained and there is where the frogs are located.
- The RMP/EIS should include measures to improve the likelihood of persistence of sage grouse and other species dependent on sagebrush and rangeland habitats. Actions clearly are needed to ensure that there will not be need in the future to list sage grouse or other sagebrush dependent species in Idaho as threatened or endangered and, more broadly, to ensure that these species and their habitats are conserved and restored.
- more attention should be given to increase the restoration of Sage Grouse habitat and to identify this species as a barometer of successful policy. These policies should include permanent wilderness status to all existing Wilderness Study Areas and any future lands identified as having outstanding wilderness qualities.
- 3920 Wildlife: Apparent decline in Prairie Falcons- central part of NCA- need to identify cause
- 3940 Wildlife: protect brood rearing and wintering places for sage grouse by not allowing grazing in the areas, (and by doing whatever else you can)  
Wildlife: Habitat needs to be improved. Revegetate burns with sage brush and native grass. Suppress cheat grass. Link up sage brush areas to facilitate sage grouse and insure adequate nesting cover.

**Comment Code****Comments**

- It is critical that the RMP/EIS incorporate recently adopted sage grouse guidelines that were developed by the Western Association of Fish and Wildlife Agencies and published in the Wildlife Society Bulletin (28:967-985). The plan must clearly demonstrate how these guidelines have been incorporated or explain in detail the reasons for any deviations from them. Important parameters such as grass residues for sage grouse nesting cover must be addressed.
- 4010  
Vegetation: Are we managing for fire or to limit fire?
- 4020  
Please describe if there is a plan in the Resource Management Plan that discusses the management of wildfires and how it would be contained, post-fire restoration plans, and what resources would be used to contain wildfires.  
BLM should define the appropriate management response to fires taking into account protection of objects and resources. Emergency fire rehabilitation protocols should also be developed and must be consistent with the protection of the area's objects, resources and objectives.  
The use of heavy, damaging equipment in fire suppression should be restricted in WSAs, ACECs, RNAs, riparian habitat, areas with cultural values and areas with sensitive species populations.  
All fire lines constructed with heavy equipment should be back filled and reseeded using native plant species. Waterbars should be part of the rehabilitation process in areas with highly erosive soils and terrain with sloping greater than 15%.  
In addition to livestock grazing, fire is a significant problem in this area and is a concern in the Bruneau Resource Area as well. Therefore, the RMP should address fire prevention and rehabilitation of burned lands in both Resource Areas.  
The BOP is being multiple-used to death, and is now a weed Hell. Yes, fire leads to the proliferation of exotic species - but BLM has steadfastly refused to take necessary post-fire management actions to allow recovery of plant communities by allowing grazing to resume a mere 2 growing seasons following fire. Plus, BLM has failed to significantly reduce grazing use with so that when lands do burn, there is no native understory that can recover, and exotics thrive.
- 4030  
With approximately 60% of the NCA impacted by recent wildlife fires, how will the BLM prevent or aggressively mitigate future unsustainable levels of wild land fires from occurring, restore wild land and rangeland ecosystems in the long-range, and encourage local community involvement in collaborative management plans? Also the DEIS should disclose if the BLM has a strategic plan for management and prevention of wild land fires?

**Comment Code****Comments**

Due to the degraded condition of lands from 140 years of livestock grazing, and the looming threat of exotic species invasion in post-burn environments, burning is simply too risky.

A comprehensive fire management plan should be developed for both planning areas and should include the identification of the threats imposed by hazardous fuel situations.

The BLM should identify areas for experimental reintroduction of fire into areas with juniper encroachment. BLM should establish specific protocols for which areas may qualify for such treatment and should establish the goal of mimicking the historical fire regimes of affected plant communities in these considerations. These protocols must include pre-fire rest and post-fire rest from livestock grazing, motorized recreation and other disturbing activities. Post-fire rest must be at least 3 years to ensure adequate establishment of shrub and forb species. All areas identified for such rehabilitation must have significant monitoring to identify and treat any weed problems before and after burning. . . .Sagebrush seeding after the burn must be mandatory.

The BLM will also need to develop a community education program to work with landowners and local governments to establish some land use agreements to help control the fire problems. This may include local restrictions on burning on private property during the summer months. It may also include agreements with landowners to create defensible space around their property to serve as fire breaks. The BLM received some of the national fire funds to address these and other issues concerning the urban/wildland interface. We strongly support the BLM using some of this funding to help the dire situation in the SRPOBNCA.

Eliminate prescribed burns on public rangelands.

Eliminate prescribed burns on public lands.

4040

Use grazing as number 1 tool for fire suppression.

Recently (August 2001) after a meeting of the Western Governors Association, a 10-year comprehensive strategy was developed and published. The title of the document is "A Collaborative Approach for Reducing Wild land Fire Risks to Communities and the Environment." EPA suggests incorporating elements of this document into the DEIS.

Aerial seeding of native shrub and forb and grass species should be mandatory for all areas following prescribed or accidental fires.

**Comment Code****Comments**

- We believe fire influences must be an integral component of the management of vegetation and the restoration thereof. The elements we believe should be addressed include: -Strategies for public education and prevention of man caused fires including the activities on the Orchard Training Area (OTA). -Strategies for establishing fire protection levels that are commensurate with long term establishment of desirable vegetation.
- 4110  
Livestock grazing: Better grazing management. Leave nesting habitat. Review- in relation to site parameters: number of AUM's-intensity, season of use, duration of grazing, location, riparian areas, use of exclosures-restoration. If there is an overgrazing problem-resolve it considering factors above
- 4120  
Recreation: Livestock grazing pollutes water with deadly pathogens, damages native vegetation, causes weeds, and is incompatible with recreational users of public lands  
Livestock grazing: Manage land and undertake this RMP process for important recreational , ecological, cultural, and other values, NOT grazing. These national significant lands have values that are being harmed by grazing.  
Livestock grazing: In establishing off-site stock water areas, care should be take that it does not create overgrazing problem and damage sage grouse to bighorn sheep habitat.  
Winter grazing, which desiccates native grasses, strips them of standing material necessary to protect sensitive crowns from winter freezing, and typically occurs during periods when some growth actually is occurring on native plants, needs to be eliminated.
- We are tired of visiting BRA wild lands and encountering seas of livestock feces, bare dirt or weeds surrounding cow tanks, and on closer examination seeing extensive areas of lithic scatter being newly exposed by erosion from livestock concentration. modest maintenance and protective measures for native wildlife are often lacking. Floats are non-existent, there are no wildlife escape ladders so troughs are deathtraps for migratory birds, etc.  
BLM must fully recognize the fact that domestic livestock are the primary cause of weed infestation on BRA lands. Livestock: travel cross-country transporting weed seeds in mud on hooves, fur and feces; create zones of intensive disturbance that are ideal sites for infestation by weeds, harm and weaken native vegetation giving aggressive exotic species an advantage.  
Livestock grazing during all periods of the year damage soils and microbiotic crusts, and increase soil vulnerability to wind and water erosion. Trampling damage to soils affects everything from burrows of native animals, to larvae of native pollinators to roots and mycorrhizae of native tree shrubs and trees. Since harms to soils are hard to quantify and monitor from year-to-year, it is essential that BLM establish upland standards of use that provide maximum protection for soils.

**Comment Code****Comments**

I found sage grouse in several scattered locations, but always in low numbers when I was birding in this area. It is known that these grouse need residual grass in which to nest successfully, and that they require native forbs in the spring to lay egg. Livestock grazing in this very dry environment tends to remove the requisite grasses and forbs, and often results in the introduction of weedy species.

Maintaining soil microbiotic crusts is the best measure that can be taken to prevent invasion by cheatgrass. Livestock grazing during all periods of the year damage soils and microbiotic crusts, and increase soil erosion caused by wind and water. . . . Since harms to soils are hard to quantify and monitor from year-to-year, it is essential that BLM establish upland standards of use and monitoring that provide maximum protection for soils.

The new RMPs must address habitat impacts from livestock grazing. The RMPs must include direction to limit the impact of grazing on riparian and aquatic habitats, and require mitigation for past impacts. The RMPs should also require monitoring of riparian and aquatic habitat conditions.

One significant use of the NCA that impacts the vegetation is grazing by domestic livestock. We believe the planning alternatives should explore a variety of grazing systems, seasons of use and changes in classes of livestock. . . . -Grazing alternatives should address the protection of rehabilitated areas to ensure establishment and sustaining of the new vegetation.

Sinker Butte in the SRBOP area. I am concerned about the level of resource damage I see in these areas. Riparian lands are damaged by livestock. Uplands are overgrazed; stubble height is nothing more than a nubbin. Water developments encourage livestock to trash an ever-widening amount of public land. Off-road vehicles have left tracks all over the landscape. Where the land is sloped, precipitation turns tracks into gullies.

Another problem is private livestock grazing, with ground nesting birds being affected the most, trampling of ground cover is also a serious problem.

4130

Livestock grazing: Fully declare the inventory of range mgt projects that are necessary to achieve the usage pattern goals. Insure each project has assigned maintenance responsibility. Why? From 50% to 90% of range projects are non-functioning or orphans.

Within the SRBOPNCA, cattle grazing has been an on-going, permitted activity. Livestock grazing has a potential to be a serious threat to resource values in the intermountain west. ....The DEIS should identify how the SRBOPNCA-RMP will provide a functional balance between the viable native plant communities and a productive rangeland community for livestock.

BLM must honestly assess harms being caused by livestock grazing, the importance of this land for other uses, and carefully and honestly evaluate whether continued grazing on damaged lands is in the public interest.

**Comment Code****Comments**

We are including an extensive list of scientific references detailing the multiplicity of ecological harm caused by livestock grazing that has been compiled by Dr. Elizabeth Painter. This should also be used as a basis for BLM's livestock and other analyses in the RMP process. Basic references include: Fleischner 1994, Belsky 1996, Belsky et al. 1999, Belsky and Gelbard 2000.

BLM has utterly failed to analyze watershed-scale impacts of livestock grazing. The RMP analysis must do this.

BLM must designate large (greater than 10,000 acres) sites, and watersheds, over several representative portions of the BRA to act as reference sites to allow evaluations of livestock grazing impacts to these wild lands.

BLM must inventory and identify all range projects and present this information to the public in the RMP - wells, pipelines, troughs, spring-gutting projects, fences, cattleguards, cow corrals, etc. The location, operating condition and state of repair of all installations must be revealed to the public, as well as their cost at time of construction, and their maintenance responsibility.

BLM must provide an analysis of range installations that may be degrading important wild land sites.

After compiling comprehensive inventory and analysis of range installations, BLM must identify those which are no longer working/in repair, and also those which are causing harm to public lands resources, and act to remove them.

BLM must visit all installations, collect complete and systematic information on their impacts on soils, microbotic crusts, native vegetation, watersheds, wildlife, and cultural sites, and determine whether it is in the public interest to remove them and restore damaged lands.

BLM must also evaluate the impacts of fences and fence posts. For example, if a fence is located in important sage grouse nesting habitat and it is providing perches for sage grouse nest predators such as ravens, the fence should be removed.

A key part of BLM's analysis must be the reduction in livestock numbers necessary as a result of facility removal and subsequent site restoration.

BLM must assess the impacts of all wells and pipelines on native species, and analyze the removal of these artificial livestock water sources in the BRA. This is particularly important in the case of the Ant Hill Well pipeline, pipelines in the Battle Creek-Jacks Creek country, and pipelines in the Triguero area west of the Bruneau River. These artificial water sources are resulting in serious damage to surrounding lands due to concentrated and/or increased livestock use.

In addition, BLM must conduct annual use pattern mapping to identify zones of intense livestock use. Use in NO areas of a pasture/allotment should exceed upland standards.

**Comment Code****Comments**

The condition concept for rangelands is currently being revised to reflect the recognition that there are generally several stable plant communities that can become established upon a given ecological site, rather than a single (climax) stable potential plant community. . . .Therefore, the current successional status concept should be used in the Bruneau RMP because it can easily be adapted and remain functional as the state and transition model for condition is developed and refined.

the primary Bruneau MFP Objective applicable to the East Castle Creek Allotment for range condition and trend was met in 1997. We do not attach the data herein, since this is comment to the scoping process. However, we will do so if necessary in our comments to the draft RMP.

MUR WS-1.1 of the Bruneau MFP established a guideline that utilization be limited to 50% or less of the current-years growth on key forage species, including perennial grasses. The Kings' consultants have collected key forage plant method utilization data at BLM VSSs within the East Castle Creek Allotment for a number of years, and the summary shows that this MUR has been met. We do not attach the data herein, since this is comment to the scoping process. However we will do so if necessary in our comments to the draft RMP.

The Bruneau RMP process should include an effort to identify undeveloped spring sources upon public domain that have enough water for both livestock and wildlife that could be improved by fencing the spring source and piping water to a downhill trough, thereby increasing the amount of undisturbed vegetation around the spring source and improving the quality of the water available to both wildlife and livestock. The Bruneau RMP process should also include an effort to identify locations where new water catchments could be developed upon public domain lands in order to reduce livestock reliance upon streams and creeks as primary water sources.

Finally, the Bruneau RMP process should include an effort to identify the location of water developments that were in place prior to 1976 to document that the use and maintenance of such developments is not subject to any of the permitting requirements that were put into place in 1976 and thereafter.

The evaluations should be made to determine which management practices were effective in meeting applicable management objectives and which were not.

The condition concept for rangelands is currently being revised to reflect the recognition that there are generally several stable plant communities that can become established upon a given ecological site, rather than a single (climax) stable potential plant community. . . .Therefore, the current successional status concept should be used in the Bruneau RMP because it can easily be adapted and remain functional as the state and transition model for condition is developed and refined.

the primary Bruneau MFP Objective applicable to the Riddle Allotment for range condition and trend was met in 1997. A summary of the 1979-80 and 1997 successional status data is affixed as Exhibit B. A detailed Data Release Report regarding the successional status (ecological status) data collected by WRS in 1997 is affixed as Exhibit C.

**Comment Code****Comments**

Since the successional status (condition) objective that the Ranch recommends be incorporated into the Bruneau RMP requires less acreage to be in the late seral and higher stage of successional status (because a small amount of the public domain acreage is allowed to be in the early and mid seral stage) it is expected that the condition of the rangeland resources within the Riddle Allotment would continue to be maintained and the primary range management objective would be met with the Ranch's full preference of 27,199 AUMs activated under a March 16 turnout date.

MUR WS-1.1 of the Bruneau MFP established a guideline that utilization be limited to 50% or less of the current-years growth on key forage species, including perennial grasses.

Allotment wide utilization from 1995 through 1999 averaged 18% based upon data collected by WRS. . . .Such expected utilization levels are well below the Bruneau MFP Objective to limit livestock utilization to 50% or lower.

The Bruneau RMP process should include an effort to identify undeveloped spring sources upon public domain that have enough water for both livestock and wildlife that could be improved by fencing the spring source and piping water to a downhill trough, thereby increasing the amount of undisturbed vegetation around the spring source and improving the quality of the water available to both wildlife and livestock.

The Bruneau RMP process should also include an effort to identify locations where new water catchments could be developed upon public domain lands in order to reduce livestock reliance upon streams and creeks as primary water sources.

Finally, The Bruneau RMP process should include an effort to identify the location of water developments that were in place prior to 1976 to document that the use and maintenance of such developments is not subject to any of the permitting requirements that were put into place in 1976 and thereafter.

Some of the biggest obstacles relating to BLM management in this area are the result of unscientific and highly subjective standards and guidelines assessments. . . .The method of conducting these assessments should be reviewed and re-evaluated.

If valid assessment data shows resource impairment of riparian areas and valid trend data shows a downward trend and the impairment is clearly shown to be related to livestock grazing, BLM should select an alternative from the range of available management options that meets the resource goal without unnecessary harm to grazing operators rather than simply eliminating grazing during the July to September period as was done in the Owyhee RMP.

The BLM must inventory and identify all range projects and present this information to the public in the RMP - wells, pipelines, troughs, spring projects, fences, cattleguards, cow corrals, etc. The location, operating condition and state of repair of all installations must be revealed to the public, as well as their cost at time of construction, and their maintenance responsibility.

**Comment Code****Comments**

4140

The BLM must provide an analysis of range installations that may be degrading important sites. . . .The BLM must visit all installations, collect complete and systematic information on their impacts on soils, microbotic crusts, native vegetation, watersheds, wildlife, and cultural sites, and determine whether it is in the public interest to remove them and restore damaged lands.

Vegetation: Fence Kuna Butte and make a separate allotment to rest other areas, and reduce fuel loads near urban interface  
Livestock grazing: Grazing management after burns needs a major strengthening. More burns are repeatedly trespassed that meet rest criteria-penalties for violation are a joke. Riparian areas that should be improved: Duncan Creek, Cottonwood Creek, Big Jacks, S.Shoo-fly, Mary's Creek, Castle Creek, Blue Creek.  
Livestock grazing: If springs are fenced watering troughs need to be used. Use grazing for cheat grass suppression.  
Elimination of livestock grazing which is neither economically more ecologically sustainable;  
Management practices that have proven to be effective in achieving, or progressing toward achievement of, objectives that are brought forward into the new plan should be given a high priority for implementation under the new plan.  
Permittees and other public land managers whose management has achieved Bruneau MFP objectives or made substantial progress toward their achievement should be rewarded and encouraged in the Bruneau RMP and provided with incentives to continue their good stewardship into the future.  
Finally, any improved management practices and/or technologies that are more effective in making progress toward achievement of stated objectives or new monitoring methodologies that are more effective in assessing such progress should be identified in the new plan.  
Management practices that have proven to be effective in progressing toward achievement of objectives that are brought forward into the new plan should be given a high priority for implementation under the new plan.  
Permittees and other public land managers whose management has achieved Bruneau MFP objectives or made substantial progress toward their achievement should be rewarded and encouraged in the Bruneau RMP and provided with incentives to continue their good stewardship into the future.  
Eliminate livestock grazing from all newly acquired special purpose lands.  
Land treatments and range improvements primarily oriented towards maintaining or increasing livestock forage will not be allowed.

**Comment Code****Comments**

Land treatments and range improvements will be limited to those that resolve an identified site specific resource problem and contribute to achieving properly functioning ecosystem.

Eliminate livestock grazing in riparian and other sensitive areas. Prohibit artificial water developments.

Discontinue livestock grazing--as both ecologically and economically livestock grazing is not in the best interest of the land or the public.

all livestock grazing must be permanently ended, so that restoration of these drastically disturbed lands can be undertaken. Instead of acting over the years to reduce or eliminate livestock use, BLM has instead: built dozens of miles of unnecessary new fence to enable more complete destruction of upland areas, allowed extensive water hauling that has further degraded fragile low elevation vegetation, allowed grazing during droughts, almost immediately (within 2 years) following fire, etc.

Ban livestock grazing in riparian areas. Grazing is only one use of federal land, and should not so dominate policy, and the landscape, as is currently the situation. Ban guzzlers and wells for non-native wildlife.

4141

Wildlife: Fix True blood fence along Shaw Lane

Riparian/Streams/Fisheries: Need to follow through on pipeline agreements to provide water to allotments.

Riparian/Streams/Fisheries: Wilderness study areas at issue. Pipeline would run east from Jack Creek Basin, to rattle snake to horse basin

Vegetation: Split center allotment-run in common with another ranch, so would be beneficial to split

Livestock grazing: All fences should be antelope friendly.

Livestock grazing: Fence off spring heads to prevent overgrazing, but provide stock watering areas.

Riparian: BLM should develop spring sources for watering of livestock and wildlife there by reducing the pressure on stream side and creek side Riparian areas

Wildlife: Fence cattle out of riparian areas

Wildlife: Use exclosures on portions of springs and along riparian areas-can use cattle watering corridors.

Needs additional water sources for his cows in Battle Creek pastures 10 & 15.

**Comment Code****Comments**

PERMANENTLY LAY TO REST THE JACKS CREEK PIPELINE PROPOSAL . . . This antiquated proposal is constantly raised by cattlemen wishing to expand livestock damage into new areas. If built it would destroy its surroundings. BLM must determine that it is unnecessary and not in the public interest.

Battle Creek Allotment 1. Reconsider proposed fence placement on riparian areas that under present plans completely exclude us from livestock waterings that have historically been used by livestock.

Battle Creek Allotment 2. Provide additional water sources by extension of existing pipelines or new lines.

4. Pasture 15 (Basin) We no longer make use in this pasture but development of the existing well and installation of pipelines could very simply solve the existing problems in this pasture. Also the need for continued use of the old water gap on Little Jacks Creek just below Bruneau Cattle's 40 acres at the OX is a viable part of a forthcoming plan.

Center Allotment 1. Completion of the Wichahoney Pipeline.

Center Allotment 2. Fencing in pasture to segregate the use....would be advantageous for management purposes.

East Canyon View 2. Wichahoney Pipeline extends into East Canyon View.

Livestock impacts to bighorn sheep should be limited by not allowing livestock watering facilities within two miles of bighorn sheep habitat. All domestic sheep grazing should be immediately eliminated from these public lands to reduce the chance of disease transmission from domestic sheep to bighorn sheep.

BLM should identify and restore springs and seeps affected by make-shift or improperly located livestock facilities. Salt blocks, fences, pipelines and other livestock facilities should not be located in riparian or other aquatic areas.

BLM should retain sole title and ownership of all future permanent range improvements. Where deemed necessary to achieve resource objectives, the BLM will acquire sole title and ownership of existing range improvements through compensation, exchange, and/or other authorities.

If illegal range improvements are located on public land, BLM should dismantle and remove the objects and materials, for example spring developments and stock tanks. The BLM will rehabilitate the area to the extent possible to allow recovery for illegal developments.

Water developments should only be allowed where it is the only method to protect resources. New and additional water developments and diversions should be very limited.

Existing water developments and diversions should be assessed for their overall impact on resources and should not be allowed to dewater springs, seeps or streams.

**Comment Code****Comments**

- BLM should remove or relocate water developments where they are causing harm and developments should not be allowed for the purpose of increasing livestock numbers.
- Any range improvements that become moribund will be removed and the area returned to a more natural state.
- BLM will retain sole title and ownership of all future permanent range improvements. Where deemed necessary to achieve resource objectives, the BLM will acquire sole title and ownership of existing range improvements through compensation, exchange, and/or other authorities.
- Ensure existing water developments/facilities are improved to reduce/eliminate losses to wildlife.
- 4142
- Livestock grazing: Don't replant with exotic seeds/grasses which are only more palatable to cows.
- BLM should not construct new or temporary fences in burned lands. Existing pasture fences must be used to control livestock.
- The use of machinery, like plowing and disking, for vegetation manipulation should be very carefully limited and should not be used where it may harm resources or objects.
- Chaining should not be allowed.
- Aerial chemical applications for vegetation management should be strictly limited.
- Vegetation manipulation should not be allowed for the purpose of increasing forage for cattle.
- Livestock grazing motorized use and other ground disturbing activities must be eliminated from the burned areas for a minimum of 3 years after the fire. This will help limit the spread of cheatgrass and other weeds to the extent possible.
- 4143
- Recreation: Keep cattle off wet ground, especially in spring, they mess up hiking areas
- Livestock grazing: Review cattle access in the wet spring and to riparian areas
- Livestock grazing: Remove cattle from sage grouse lek areas and areas where endangered plants are found.
- Wildlife: Remove cattle from important upland (sage grouse) and riparian habitats to restore these sites.

**Comment Code****Comments**

4144

It is senseless to continue allowing water hauling. Lands that are too arid to provide surface water to livestock should not be grazed. Water hauling leads to road damage and disturbance of wildlife, as well as rancher clamoring for road improvement. Plus, any sites where water is hauled - even one grazing season - will suffer permanent harm from trampling and grazing damage and weed invasion near the water haul site. If BLM plans to continue any water hauling, it must identify the sites in the RMP.

Riparian: 6" stubble trigger, 5% bank trampling trigger to remove livestock from springs, seeps, streams- to protect water quality, fish, recreation uses.

Riparian: No grazing of non-functioning or functioning, at risk streams, these are too damaged and vulnerable to erosion to graze, trample.

If BLM, using current science and following detailed inventory and assessment finds it may be suitable for livestock as a "use" of public lands to continue in any areas, the RMP must establish specific quantifiable standards of livestock grazing use. A 6" stubble height must be the trigger to move livestock from springs, seeps, riparian areas. A trampling standard of 5% or less of accessible bank area with livestock trampling is another trigger/threshold that must be instituted. When the 5% trigger/threshold is crossed, livestock should be removed from the area.

Upland utilization standards must be 30% or less of native species, with no grazing allowed during critical growing periods.

BLM must rely on the implementation of standards of use coupled with significant reductions in stocking rates, to protect lands from livestock damage.

A minimum period of five years rest from livestock grazing following any wildfire must be standard operating procedure on BRA lands. This is necessary to allow recovery and establishment of native species. Grazing should then be allowed only if specific criteria for establishment of native vegetation and microbiotic crusts have been met.

RM-1.5. . . This issue needs to be addressed in the Bruneau RMP. In the Bruneau RMP, reference should be made to the anticipated language regarding "minimum growth needs of preferred plant species" should be changed so it is clear what is meant. The bottom line is that the desired mix of successional stages is maintained or achieved for the particular allotment and the particular settings.

On areas that are going to be restored, grazing should be curtailed for a minimum of five years in order to give the plants a chance to grow.

**Comment Code****Comments**

BLM should ensure grazing conforms to the "Standards and Guidelines for Grazing Administration" by placing a priority on assessing areas to see if they are in compliance. If the areas are not in compliance, immediate action should be taken to rectify the grazing management.

Grazing should be eliminated in riparian/wetland areas after the growing season. Grazing should also be eliminated from all riparian pastures where water quality standards are not met within a reasonable amount of time, suggested two years, for factors affected by livestock grazing (fecal coliform, turbidity, temperature, etc).

Livestock grazing schedules will include period(s) of rest during times of critical plant growth and regrowth. Continuous season-long grazing will not be authorized until it has been demonstrated that it is consistent with achieving proper functioning ecosystem condition in meeting identified resource objectives. Yearlong grazing will not be authorized.

Mineral, protein, and other supplements, including forage will be placed at least a quarter of a mile away from riparian/wetland areas, springs, seeps, and perennial streams and rivers. The location of such materials must also not impair important biological, geological, paleontological or cultural resources and their locations. Site storage of materials is not allowed.

Mineral, protein, and other supplements, including forage will be placed at least 0.25 miles from riparian/wetland areas, springs, seeps, and perennial streams and rivers. Site storage of materials is not allowed.

Meet Idaho State water quality standards as a condition of issuing any grazing permit.

Adjust overall livestock grazing management practices to maintain (good/excellent) and improve (poor/satisfactory) habitat for big game. Limit livestock use of key browse species to 20% annual forage production or less within crucial habitat for all big game.

Reseed burned areas with a variety of native shrubs, forbs, and grasses palatable to pronghorn and other native wildlife. Eliminate livestock grazing on all burns and seedlings for a minimum of three calendar years following treatment.

If the BLM, using current science and detailed inventory and assessment, finds livestock grazing as a suitable "use" of public lands, the RMP must establish specific quantifiable standards of livestock grazing use. A 6" stubble height must be the trigger to move livestock from springs, seeps, riparian areas. A trampling standard of 5% or less of accessible bank area with livestock trampling is another trigger/threshold that must be instituted. When the 5% trigger/threshold is crossed, livestock should be removed from the area.

Upland utilization standards must be 30% or less of native species, with no grazing allowed during critical growing periods. Winter grazing, which desiccates native grasses, strips them of standing material necessary to protect sensitive crowns from winter freezing, and typically occurs during periods when some growth actually is occurring on native plants, needs to be eliminated. . . .The BLM must rely on the implementation of standards of use, coupled with significant reductions in stocking rates, to protect lands from livestock damage.

**Comment Code****Comments**

4145

A minimum period of five years rest from livestock grazing following any wildfire must be standard operating procedure on BRA lands. Native species should be used in any post-fire seeding effort - or in any seeding effort (such as road rights-of-way, areas where cow troughs are removed, etc) in BRA lands.

Riparian: How will the planning units be managed when there are not cattle on the units?

As part of its analysis, BLM must examine roading in the context of furthering livestock uses. Roads and jeep trails whose primary purpose is placing salt and checking on a water trough should be closed and restored/obliterated. Livestock permittees own horses, and can and should use them in pursuing public lands livestock grazing.

This area has many outstanding values that should be enhanced, and the subsidized livestock industry should be of secondary importance in your management plans.

Protection and enhancement of the Bruneau's outstanding values and eventual elimination of utterly inappropriate large-scale cattle grazing;

Rather than set a condition objective that all public domain lands be managed to achieve a single stage of successional status, the Bruneau RMP should set an objective to manage so that a matrix or mix of successional stages are achieved.

The new plan should also provide for flexibility in successional stages in appropriate for the ecological setting, stable-state ecological status, wildlife habitat, and livestock of the particular allotment.

This issue also needs to be assessed in conjunction with RM-2, discussed below. On sites which cannot reasonable be expected to "low input" management changes, the lands need to be recognized for their expected future successional state (e.g. cheatgrass-dominated), or they need to be aggressively treated to change the species composition.

**Comment Code****Comments**

Range Management Objective 2: . . The new Bruneau RMP needs to address the issue of land treatments on areas that are disturbed from the "native" successional state due to past or future wildfires, past or planned vegetation manipulation treatments, or other major disturbances. Such areas should not be subject to successional status/ecological condition requirements for native range as discussed under Range Management Objective 1.

The Bruneau RMP objective to address this issue should be written as follows: "Continue to implement treatment projects identified in the Bruneau MFP, and allow new land treatment projects to stabilize soil resources and increase forage production for livestock and wildlife in areas that have been disturbed by past or future wildfires, past vegetation manipulation treatments, future vegetation manipulation treatments in area which cannot reasonably be expected to achieve desired ecological status in the planned future, or other major disturbances. Land treatments allowed under this objective shall include seeding projects using native plant species, introduced plant species, or a mixture thereof appropriate to the soils, precipitation, and objectives of the seeding project.

RM-2.2 . . This MUR needs to be clarified to identify that prescribed fire or chemical control may be used to treat certain areas to change relative species composition. The new plan should also clarify that where seedings occur, even with native species as all or part of the seed mixture on disturbed areas, ecological condition status does not and will not apply in the future, but rather a different quantified objective pertinent to the objectives of the seeding project.

Range Management Objective 3. . This Objective should be dropped because it is redundant with RM-1. Any applicable MURs under this Objective should be moved to fall under Range Management Objective 1. . . this RM, if retained, should be modified to state that "Livestock use will be authorization to the maximum extent possible while maintaining or enhancing the range and soil resource."

RM-3.1. . This MUR should be modified to make forage allocation for livestock dependant upon current monitoring of recent actual use, utilization, successional status, production, and crop year precipitation over time, as described below.

Rather than set a condition objective that all public domain lands be managed to achieve a single stage of successional status, the Bruneau RMP should set an objective to manage so that a desirable amount of undisturbed native public domain falls within each stage

RM-1.1. . This MUR should be revised to reflect the fact that the current regulations guiding BLM management recognize both AMPs and functional equivalents to AMPs as valid activity plans and should be rewritten in the Bruneau RMP as follows: "Implement intensive management through Allotment Management Plans (AMPs) or their functional equivalent." . . The priority order for the development of AMPs or their functional equivalent listed in the Bruneau MFP should be reevaluated and updated as appropriate based upon current resource values and conflicts, as well as adequate monitoring data to support the grazing plan.

**Comment Code****Comments**

RM-1.4. . .See RM-1.1 above regarding functional equivalents to AMPs. Except for items 2 and 7, the constraints accepted under the Bruneau MFP Step 3 Decision for this MUR are applicable to management of the Riddle Allotment and should be carried forward into the Bruneau RMP.

RM-1.5. . .This issue needs to be addressed in the Bruneau RMP. In the Bruneau RMP, reference should be made to the anticipated AMPs or functional equivalents discussed above and the language regarding "minimum growth needs for preferred plant species" should be changed so it is clear what is meant. This issue should be addressed in the Bruneau RMP as follows: "Adjust livestock season of use and/or implement grazing systems on spring and summer range through AMPs or their functional equivalents to ensure that the composition of preferred plant species is maintained or improved consistent with the range of successional status stages established for undisturbed native range."

Range Management Objective 2. . .The new Bruneau RMP needs to address the issue of land treatments. However, this issue deals with areas that are not, or will not be, undisturbed native range due to wildfires, past or planned vegetation manipulation treatments, or other major disturbances. Such areas should not be subject to successional status/ecological condition requirements for undisturbed native range as discussed under Range Management Objective 1. The Bruneau RMP objective to address this issue should be written as follows: "Maintain existing treatment projects and allow new land treatment projects to stabilize soil resources and increase forage production for livestock and wildlife in areas that have been disturbed by wildfires, past vegetation manipulation treatments, or other major disturbances as well as areas where new or continued vegetation manipulation projects are approved through activity plans. Land treatments allowed under this objective shall include seeding projects using native plant species, introduced plant species, or a mixture thereof."

RM-2.2. . .Ecological condition requirements should only be applied to undisturbed native range under Range Management Objective 1. Therefore, the reference to "improve ecological condition" should be dropped from this recommendation.

Range Management Objective 3. . .this Objective fundamentally deals with the range condition issue that is the focus of Range Management Objective 1 and is redundant. This Objective should be dropped and any applicable MURs under this Objective should be moved to fall under Range Management Objective 1.

RM-3.1. . .This MUR should be modified to make forage allocation for livestock dependant upon recent actual use as adjusted based upon monitoring of successional status, production, utilization, actual use, and crop year precipitation over time, as described below.

it is of utmost importance that the RMP ensures that the current level of livestock grazing will be maintained. The Bruneau Planning Area was set aside under the Taylor Grazing Act so that the range "may be put to the highest productive use". Livestock grazing is, and should continue to be, considered and utilized as such.

The Resource Management Plan for these areas must focus on protection and enhancement of the Bruneau's values. They should not be used for cattle grazing.

**Comment Code****Comments**

4150

Focus on protection and enhancement of the Bruneau's outstanding values and not simply the overstocking of cattle. Eliminate grazing and ORV use completely from the Birds of Prey NCA.

Vegetation: Eliminate all grazing in lands with <12" precipitation. Due to vegetation damage (Ref. Debra Donahue- "Western Range Revisited").

General Process/Other: Conduct livestock grazing suitability analysis, this is necessary for current inventory of public lands.

General Process/Other: In view of recent history with troubled pastures, standards flickers, initiate a suitability analysis to identify the 10% that constitute the most management and herding failures.

BLM must provide a two-part grazing suitability analysis that : 1) catalogues and describes BRA lands unsuitable for grazing due to lack of herbaceous vegetation "production"; distance from natural water sources; slope, rockiness (much of the low sagebrush table country); existing environmental damage (down cut gullies, wet meadows with shrinking wetted areas due to livestock damage, lands "at risk" to weed invasion), etc; and 2) Catalogues and describes lands unsuitable for grazing based on their important values to rare and declining species, recreational uses, cultural sites, aesthetic value, and other legitimate uses and values of public lands that are harmed or degraded by the pernicious effects of livestock grazing.

We are unaware of any such past suitability analyses that have been conducted in the BRA. If they exist, please provide them for public review. However, they can in no way be considered "current", nor can they reflect "current" scientific knowledge of livestock grazing impacts/ramifications.

The new assessment/inventory of acres of lands suitable and unsuitable for livestock grazing must be based on scientifically accurate criteria, be comprehensive, and include collection of on-the-ground data on microbiotic crusts, vegetation, wildlife, etc.

Lands in the BRA must also be assessed for suitability in comparison with their other uses by society (recreational, aesthetic, spiritual).

My main concern is that grazing pressure was too great in many areas, and I think BLM should prepare a Grazing Suitability Analysis to decide which of these lands are suitable for grazing by these alien commercial herbivores.

Preparation of a current Grazing Suitability Analysis to determine which Bruneau lands are actually suitable for livestock grazing;

**Comment Code****Comments**

Range Management Objective 1: . . . The new Bruneau RMP needs to address this issue with a similar objective. . . .The BLM determination that all of the public domain within the boundaries of the East Castle Creek Allotment is suitable for livestock grazing remains valid. However, the condition aspect of Range Management Objective 1 needs to be updated to reflect more current terminology and concepts.

Range Management Objective 1. . .The new Bruneau RMP needs to address this issue with a similar objective. . . .The BLM determination that all public domain within the boundaries of the Riddle Allotment is suitable for livestock grazing remains valid. However, the condition aspect of Range Management Objective 1 needs to be updated to reflect more current terminology and concepts.

I would like the RMP to focus more on these wild and scenic areas than on grazing. I feel these areas have been and are being grazed too heavily. I would like the BLM to figure out what lands are best for grazing and what lands would be better off with less cows.

Before issuing any grazing permits on public land, a livestock grazing capability analysis (which identifies lands that can be physically grazed by domestic livestock) will be done. This will be followed by a suitability analysis (which determines whether the capable lands have other conflicts with other multiple uses which would result in a choice not to graze those lands by livestock).

The BLM must provide a two-part grazing suitability analysis that : 1) catalogues and describes BRA lands unsuitable for grazing due to lack of herbaceous vegetation "production"; distance from natural water sources; slope, rockiness (much of the low sagebrush table country); existing environmental damage (down cut gullies, wet meadows with shrinking wetted areas due to livestock damage, lands "at risk" to weed invasion), etc; and 2) Catalogues and describes lands unsuitable for grazing based on their important values to rare and declining species, recreational uses, cultural sites, aesthetic value, and other legitimate uses and values of public lands that are harmed or degraded by the effects of livestock grazing.

We are unaware of any such past suitability analyses that have been conducted in the BRA. If they exist, please provide them for public review. However, old analyses are not "current", nor can they reflect "current" scientific knowledge of livestock grazing impacts/ramifications.

The new assessment/inventory of acres of lands suitable and unsuitable for livestock grazing must be based on scientifically accurate criteria, be comprehensive, and include collection of on-the-ground data on microbiotic crusts, vegetation, wildlife, etc.

In this RMP effort, the BLM must admit that these lands ( some with stocking rates of 30 or more acres per AUM) are NOT suitable for grazing.

The area may be in need of a major grazing suitability analysis.

Prepare a current Grazing Suitability Analysis to determine which Bruneau lands are really suitable for livestock grazing.

**Comment Code****Comments**

- The biggest environmental problem here is overgrazing by cattle, therefore: --The RMP should focus on reducing livestock grazing to levels that leave abundant forage for use by deer, antelope, bighorn sheep, and other wildlife. --Livestock grazing should be drastically reduced from even these levels in drought years like 2001. There wasn't hardly any food left for antelope, or other wildlife by late September due to cattle grazing. --BLM should prepare a current Grazing Suitability Analysis to determine which Bruneau lands are really suitable for livestock grazing and at what levels. --Plans for the Restoration of sagebrush, native plants, and native animals such as sage grouse must be developed as part of the RMP. --ORV use does not appear to be a big problem in the areas I have used. If ORV use is a problem in specific areas, the RMP should address these specific areas and not propose unnecessary blanket restrictions on ORV use.
- 4180  
General Process/other: Terminate Simplot subsidized livestock grazing in Bruneau (>50% of allotments). Billionaire welfare ranching conflicts with nationally significant biological, geological, paleontological, cultural, and other values at affected Bruneau lands. Political pressures hamper BLM management to protect public lands values.  
...only a small handful of grazing permittees who are affected in any way by livestock grazing activities here. Billionaire Simplot and the wealthy Jackson cattle operation hold most of the current AUMs. At the most, there are only 25-30 other permittees in the approx. 1.5 million acre BRA area.  
Adjust livestock grazing and OHMV use as described in the Livestock Grazing and OHMV sections.
- 4181  
Vegetation: Reduce AUMs in Battle Creek Allotment by 264, by Northwest, reduce by 100, and increase Center Creek Allotment AUMs by 364
- 4182  
BLM should outlaw Temporary Non-Renewable Use on BRA lands. TNR use is not compatible with restoration of damaged plant communities, protection of wildlife habitats, or maintenance of wildlife populations. BRA TNR has typically occurred in the winter - when there are significant conflicts between food and likely behavioral displacement.  
Center Allotment 3. Consider season of use changes.  
East Canyon View 1. Consider season of use changes.  
Stocking rates must include consideration of topography, distance to water, forage availability, etc. to determine realistic stocking rates. Stocking rates must also consider long term weather/moisture history and not overstock lands based upon optimistic single-year events.

**Comment Code****Comments**

4183

Wildlife: Finish Riddle AE in 2002, review and change grazing in SE unit in 2002. Because extreme damage is occurring to vegetation soil wildlife- right now. (Simplot allotments)

The RMP/EIS must address how individual grazing allotment plans will be incorporated into the overall plan. Critical issues such as stocking rates, grazing intensity, timing of grazing, and grazing duration must be addressed, and the plan must identify how these activities will be managed to achieve the desired vegetation conditions. Stocking rates of all herbivores must be addressed.

RM-1.1 Implement intensive management through Allotment Management Plans (AMPs), This MUR should be revised to reflect the fact that the current regulations guiding BLM management recognize both AMPs and the functional equivalents of AMPs as valid activity plans. This MUR should be re-written to state: "Implement intensive management through Allotment Management Plans (AMPs) or their functional equivalent. Livestock grazing agreements which contain allotment-specific objectives, management actions to achieve the objectives, and monitoring and analysis protocols to determine achievement of objectives or progress toward achievement, are recognized as the functional equivalent of an AMP."

RM-1.4. . .See RM-1.1 above regarding functional equivalent to AMPs.

Rather than having the perspective that reducing livestock AUMs will fix problems, the RMPs should provide guidance that will allow for the construction of allotment management plans that will consider and implement the benefits of range improvements. This will allow for the continuance of grazing and the improvement of the land and ecosystem.

Battle Creek Allotment 3. Allow more flexibility in movement from one pasture to another.

BLM should not allow intensive grazing management systems of any kind, whether off-stream or in upland locations.

Complete Allotment Management Plans and/or Analysis, Interpretation, and Evaluation (AIE) reviews within 20 years. Prioritize allotment planning.

In the absence of an approved grazing system designed to provide for functional soil processes, immediately eliminate livestock grazing by July 15th, or earlier if necessary, in all pastures to meet resource objectives, regardless of the monitoring status of the pasture.

4184

**Comment Code****Comments**

Federal legislation implementing a buyout of grazing permits and the permanent removal of livestock grazing from the affected lands is a very reasonably foreseeable development in public lands management in the BRA within the next few years. BLM must recognize this in its RMP planning, and identify allotments with highest priority for being permanently closed to livestock grazing - for restoration purposes, to protect critical habitats, to protect cultural sites, to reduce conflicts with wildlife and recreation uses, etc.

BLM must provide clear facts and figures on who grazes where - including pastures within allotments, the number of AUMs each permittee has within each pasture, associated base properties, the various AUM categories, etc. to streamline understanding of lands at stake in the future buyout processes.

BLM should address how it will handle the buy-out of grazing permits by conservation and other organizations, and should identify how it will retire such permits through the planning process. BLM should work with permittees to identify those who are interested in retiring their permits or being relocated to prevent resource damage.

Federal legislation implementing a buyout of grazing permits and the permanent removal of livestock grazing from the affected lands is a very reasonably foreseeable development in public lands management in the BRA. The BLM must recognize this in its RMP planning, and identify allotments with highest priority for being permanently closed to livestock grazing - for restoration purposes, to protect critical habitats, to protect cultural sites, to reduce conflicts with wildlife and recreation uses, etc.

The BLM must provide clear facts and figures on who grazes where - including pastures within allotments, the number of AUMs each permittee has within each pasture, associated base properties, the various AUM categories, etc. to streamline understanding of lands at stake in the future buyout processes.

4185

Acquisition of specific yearly water quality monitoring procedures must be a made a term and condition of livestock grazing permits in the BRA.

Any livestock trespass of burns must result in cancellation of the responsible rancher's public lands grazing permit.

BLM should use the RMP process to solidify the access "rights" of the public, and interested publics, to access public lands - i.e. make allowing reasonable access a term of a person's holding a federal grazing permit.

Grazing permits should require public access easements across private land. If permittees refuse to grant access to public lands, then all permits should be cancelled.

**Comment Code****Comments**

The BLM should incorporate into any grazing and other types of permitted uses a stipulation of keeping access routes open for the public, even if they cross private lands. If resource users want to continue to use the public lands for their economic benefit, then the public has a right to use roads that cross their private property to access public lands. There are far too many "No Trespassing" signs showing up along Mud Flat and some of the other major access roads in these areas. The public does not appreciate and will not allow private land owners to deny access to public lands to make personal political statements.

Livestock permittees should be accountable for meeting all standards, guidelines, and other requirements of their permit. Failure to meet annual standards of use shall result in significant reduction of permitted use the following year. A second failure within three years shall result in permit cancellation.

Grazing privileges that are lost, retired, relinquished, or cancelled should have corresponding AUMs permanently retired and the affected lands not grazed in perpetuity for watershed protection and wildlife habitat. Conservation non-use by permittees will not be considered under this action.

Grazing permits should require public access easements across private land. If permittees refuse to grant access to public lands, then all permits should be cancelled.

Terms and conditions of each permit or lease will include stocking rate, season-of-use, kind of livestock, deferment, rest, or other strategies that maintain good/excellent conditions and improve poor/satisfactory vegetation communities and ecosystem function to achieve resource objectives.

4210

Minerals: Rock hounds and picnickers spend one million man days in Owyhee county per year.

I'm a retired factory worker and for my retired enjoyment turned rock hound, I have no money and for sure I can't make none, polishing wood, Jasper, etc. But to live I have to get out there! It gives me air! A work out! Sweat! Life!

4220

Minerals: No new areas be closed to mineral prospecting and development

I and my clients, and other members of the mining and minerals industry, are concerned only to the extent that the presently existing right to mine and valuable minerals that may exist and may in the future be discovered in the planning area- continue to exist and not be jeopardized by new rules or subject to existing laws, rules and regulations, is all we ask; but we do ask that that right be preserved and protected.

4230

"Minerals" and mineral extraction should be a small subset of the broader geological discussion.

**Comment Code****Comments**

4240

Minerals: All mining activity should be required to reclaim the land.

. . .all identified sage grouse habitat should be withdrawn from ALL mineral entry, due to the extensive habitat fragmentation that could occur if mineral exploration and/or subsequent mineral extraction were to occur.

ALL WSAs, recommended Wild and Scenic Rivers, significant unroaded lands suitable for wilderness, all ACECs, etc. should be withdrawn from all mineral exploration and entry - not just from surface occupancy.

All suitable WSRs must be fully withdrawn from all mineral entry (surface and non-surface).

BLM should address how it will handle mining claims and should perform a validity examination before claimants conduct surface disturbing activities.

Withdraw from locatable mineral entry, close to fluid material leasing and mineral material disposal those BLM lands identified to contain high public resources and lands that may be damaged or degraded using the existing management directives.

Manage lands that have been returned to the BLM through revocation of withdrawals for the purpose of enhancing public values: wildlife, cultural, non-motorized recreation, etc.

Limit adverse impacts of locatable fluid mineral explorations and development and mineral material sales on big game and big game habitat through inclusion of stipulations on mining notices, Plans of Operation and mineral leases.

4245

We are very concerned about the increasing removal of lichen-covered rimrock, scenic platy red talus rocks and other rocks from the BRA wild lands for landscaping purposes. The RMP must act to strictly limit such activities, since removal of rocks is a permanent impairment of wild lands, and cultural sites and wildlife habitats may be destroyed in the process of removal.

We are very concerned about the increasing removal of lichen-covered rimrock and other rocks from the BRA wild lands for landscaping purposes. The RMP must act to strictly limit such activities, since removal of rocks is a permanent impairment of wild lands, native plants and lichen, and cultural sites and wildlife habitats may be destroyed in the process of removal.

4310

Large areas, of critical environmental concern, should be designated to protect sage grouse, special plants and animal communities, fossil sites and other important areas.

4340

**Comment Code****Comments**

Riparian: Establish playa, vernal pond ACECs (con-free) to protect areas.

Wildlife: Establish large ACECs to protect grouse, migratory birds, reptiles, and their habitats.

We believe it is necessary for BLM to establish several large ACECs to protect the significant wild land values of the Bruneau RA lands. We wish to recommend several ACECs to BLM. These include: 1)Owyhee Table Lands ACEC, 2) Sagebrush Sea Sage Grouse/Songbird ACEC, 3) Lakebeds ACEC, 4) Mountain Mahogany Savanna ACEC, 5) Shoofly Native Plant Communities ACEC.

We will also recommend some specific areas as RNAs, embedded within a larger matrix of an ACEC of sufficient size to protect "at risk" values. We will be providing you a map and expanded descriptions in the near future.

Please also review the "Reserve" proposal submitted to us by your office in the Castle Creek Allotment AIE proposal. We recommend all areas in this proposal be included as ACECs in this RMP planning process.

It seems to me that designation of large ACECs would help manage for sage grouse and other sensitive species.

Designation of large ACECs to protect sage grouse, special plant and animal communities, historical and cultural sites, and other important resources;

The BLM needs to designate large size ACECs in order to provide acceptable protection for various public values.

The BLM should establish a large ACEC for sage grouse. Other public values that demand the extra protection of ACECs include: rare plants, fossils, and migratory birds.

We believe it is necessary for the BLM to establish several large ACECs to protect the significant wild land values of the Bruneau RA lands. We wish to recommend several ACECs to BLM. We recommend some specific RNAs, embedded within a larger matrix of an ACECs of sufficient size to protect "at risk" values. RNAs should be excluded from cattle grazing and OHV use. These ACEC/RNA areas include: 1)A large Owyhee Table Lands ACEC, 2) A large Sagebrush Sea Sage Grouse/Songbird ACEC, 3) A large Lakebeds/Owyhee Front ACEC, 4) A Mountain Mahogany Savanna ACEC, 5) A Shoofly Native Plant Communities ACEC.

The BLM should designate large (greater than 10,000 acres) sites, and watersheds, over several representative portions of the BRA to act as reference sites to allow evaluations of livestock grazing impacts to these wild lands. The suggested ACECs would be excellent candidates.

Designate large Areas of Critical Environmental Concern to protect sage grouse, special plant and animal communities, fossil sites and other important areas.

4410

**Comment Code****Comments**

4430

No additional Wilderness Study Areas should be designated through the Bruneau RMP process. Many of the Wilderness Study Areas that are now awaiting congressional action do not meet the criteria to qualify as wilderness.

No additional Wilderness Study Areas should be designated through the Bruneau RMP process. Many of the Wilderness Study Areas that are now awaiting congressional action do not meet the criteria to qualify as wilderness. For example, the Battle Creek and Yatahoney Creek Wilderness Study Areas have existing 4-wheel drive roads within the study area boundaries, so do not qualify to be made into wilderness. Therefore, the Battle Creek and Yatahoney Creek Wilderness Study Areas should be recommended as non-suitable for congressional wilderness designation under the new Bruneau RMP.

Recreation: Reevaluate the WSA's to ensure they meet valid criteria and if they are really necessary

General Process/Other: Re-inventory all areas for wilderness designation because most has changed since the last one-some roads have disappeared, other roads have appeared, many areas were left out.

BLM must use this planning process to expand its evaluation of wilderness-suitable lands beyond that of the out-dated, deeply flawed and politically biased wilderness inventory process of over 20 years ago. . . .We will be providing you with a Citizen's Wilderness and Wild Lands Protection Proposal showing our vision of what this land area should be.

BLM must conduct a new inventory of BRA lands, and evaluate their Wilderness Characteristics under four criteria. These are: Naturalness, solitude, primitive and unconfined recreation, special features. "Special features" in 2002 certainly includes presence of sage grouse habitat, presence of native vegetation communities with minimal exotic species infestation, importance of large unfragmented "sagebrush sea" expanses, etc.

BLM must monitor increased airspace activity in WSAs and important wild land habitats.

BLM must track chaff proliferation and littering WSAs and wild lands.

Perhaps BLM should reexamine your roadless lands for potential Wilderness Study Areas as part of your RMP.

Inventory of potential wilderness areas within the roadless BLM lands outside the present WSAs;

I would like the BLM to do a new inventory of lands that could be included in wilderness for the Bruneau area. In these areas, could it be possible to make plans for restoring native plants or at least having pilot programs.

Large areas, outside present Wilderness Study areas, need to be studied and added to RMP.

**Comment Code****Comments**

As part of this planning process, the Bruneau Planning Area and the Snake River Birds of Prey National Conservation Area should undertake a new inventory process to determine options for additional lands that may warrant consideration for designation as Wilderness Study Areas. The BLM should assess roadless areas by using the BLM Wilderness Inventory Handbook to evaluate designation of new Wilderness Study Areas.

The BLM should undertake a new inventory process within the resource area to determine options for additional lands deserving inclusion in the National Wilderness System.

I am familiar with a number of large areas of roadless land of wilderness quality within the Bruneau Resource Area, but not included in the existing Wilderness Study Areas. These lands are bordered by constructed and maintained roads or by large tracts of private lands. They include: Area south of Big Jacks Creek WSA and west of Duncan Creek WSA, including the Cottonwood Creek area.; Area east of Big Jacks Creek WSA, including most of the Big Hill area, inventoried before the WSAs. A road (not shown on BLM Land Status maps) with stock tanks could be cherry stemmed.; Area including Little Blue Table, north to east-west road through Duncan Creek Crossing.; Area south and southwest of Little Jacks Creek WSA.; Area west of Bruneau River-Sheep Creek WSA. Also the northern J-P Desert area, surrounded (except on south) by the WSA.; Area west and east of the Bruneau River, south of the Jarbidge River WSA.; Rizzi Table area.; The upper Bruneau River area extending into Nevada, including Scott Table and Triplett Butte.; Area north and south of Sheep Creek East and West WSAs, limited in the northwest by a road along Antelope Creek.; Yatahoney Creek Basin area and areas to the gas pipeline east of Yatahoney Creek WSA and Battle Creek WSA.

The BLM needs to conduct a new inventory of wilderness quality roadless lands as part of the Bruneau Resource Management Plan.

The BLM must use this planning process to expand its evaluation of wilderness-suitable lands beyond that of the out-dated, flawed, and politically biased wilderness inventory process of over 20 years ago.

The BLM's old inventory rejected nearly all plateau sagebrush lands because "a visitor could only find a sense of monotony". Vast sagebrush plateaus devoid of human industrialization are what make the area valuable for wilderness designation.

The BLM must conduct a new inventory of BRA lands, and evaluate their Wilderness Characteristics under four criteria. These are: Naturalness, solitude, primitive and unconfined recreation, special features. "Special features" certainly includes presence of sage grouse habitat, presence of native vegetation communities with minimal exotic species infestation, importance of large unfragmented "sagebrush sea" expanses, etc.

The BLM should conduct current inventories on roadless areas within the Bruneau planning area. . . .Keeping track of special resources, such as roadless areas, must be part of this inventory process. . . .the BLM cannot rely on outdated roadless area inventories for information on the amount of primitive lands within the Bruneau planning area. This inventory should also include lands suitable for wilderness designation.

**Comment Code****Comments**

- Current Wilderness Study Areas are much too small. Re-inventory the entire areas for wilderness characteristics. Recommend for Wilderness those areas that qualify.
- Include a new inventory of the wilderness worthy lands of the large areas of roadless BLM lands found outside the present Wilderness Study Areas.
- Stress a re-inventory of all areas for wilderness quality to add to designated WSAs.
- 4440
- We propose expanded wilderness and roadless area protection (see approximate outlines on map), and designation of ACECs of sufficient size to truly protect the world-class values of this landscape.
- Establish a minimum of one-quarter mile no cutting zone around WSAs and other sensitive areas.
- Provide a one-quarter mile no cutting zone around all WSAs and future designated wilderness lands.
- expanded wilderness and roadless area protection, and the designation of ACECs of sufficient size, are needed to truly protect the world-class values and native vegetation of this landscape.
- Guarantee that any re-vegetation in designated WSAs include only native species of the area.
- 4445
- Manage WSA lands to preserve their wilderness values (natural ecology, geology, hydrology, biology, and edaphic processes).  
Manage non-WSA lands supported by citizen wilderness proposals to that same standard and for the same values.
- 4450
- WSAs, roadless areas and non-WSA lands supported by citizen wilderness proposals should be managed to preserve their wilderness values. The Wilderness Society is working with the Sierra Club and other conservation, sporting interests and concerned citizens on a revised wilderness proposal and route (road/way) classifications.
- The Sierra Club is currently working in cooperation with other groups on a newly revised citizen-based wilderness proposal and route (road/way) classifications. During the face-to-face scoping meetings, the BLM told us it was acceptable to not have to submit actual maps and descriptions of new wilderness boundaries and route designations during the RMP scoping period. We plan to share our proposals with the BLM as soon as possible. We ask the agency to keep us informed of any needed deadlines to receive this information (or other data) so it can be effectively incorporated into the RMP process.

**Comment Code****Comments**

4530

For the time being, the Sierra Club supports the Citizens Wilderness Proposal published by a coalition of interested groups in the 1999 timeframe.

Much of the affected area is flat and easy to violate by random ORV use. Such abuse diminishes the natural appearance of the area and tends to make it unsuitable for official wilderness. The bit of remaining roadless area we have should be protected and proposed for additions to the wilderness system.

BLM must evaluate additional rivers for WSR suitability. It is our understanding that BLM has never conducted a WSR suitability analysis on Big and Little Jacks Creek canyons. BLM must also evaluate Mary's Creek for WSR Suitability.

None of the rivers or creeks within or bordering the East Castle Creek Allotment should be considered for wild and scenic designation.

None of the rivers or creeks within or bordering the Riddle Allotment should be considered for wild and scenic designation.

BLM should address eligibility and suitability of rivers and their tributaries for Wild, Scenic and Recreation status during the management planning process. Specifically, the BLM should study Battle Creek, Yatahoney Creek, Big and Little Jacks Creeks, Dickshooter Creek, and Pole and Camas Creeks as well as other creeks and tributaries as possible additions to the Wild and Scenic River system.

we encourage the BLM to reevaluate suitability for all streams, creeks and tributaries within the planning areas. Management plans should address how streams found suitable will be managed for the protection of their values until Congress acts to designate these rivers. The BLM should address restrictions (if necessary) on access or other uses in areas found to be suitable in order to afford the highest interim protection available to these rivers and their associated resources and values.

The BLM should not exceed the authorization of Congress to study only identified segments of rivers and streams. The Wild and Scenic issues for the Bruneau River should be limited to those segments identified by Congress.

the scope of the developing Bruneau Plan exceeds the limits of law with respect to the study of river segments for possible designation as "Wild and Scenic." The law makes clear that land management agencies are to study for inclusion those river segments that have been specifically named by the Congress, yet the Bruneau pre-plan proposes to study segments not named by the Congress.

**Comment Code****Comments**

BLM further encouraged public support for excursions beyond the limits by indicating specific planning issues that cannot be completed without action by the Congress. . . .In regard to the Bruneau Management Area Plan, BLM advises the public that they will be addressing issues related to "management of river segments eligible for the wild and scenic river system." The impression given by that statement is that BLM has the authority to study any river segment that it, or the public, deems suitable for inclusion in the wild and scenic river system. In reality, it is the Congress that determines, and specifically names by action of the Congress, what river systems will be studied for inclusion.

The BLM must evaluate additional rivers for WSR suitability. It is our understanding that the BLM has never conducted a WSR suitability analysis on Big and Little Jacks Creek canyons. The BLM must also evaluate Mary's Creek for WSR Suitability. All suitable WSRs must be fully withdrawn from all mineral entry (surface and non-surface) and protected to maintain native vegetation.

The BLM must perform suitability studies on all Wild and Scenic eligible rivers. It must also perform eligibility studies on those river which have not yet been studied. In determining eligibility, we suggest that planners assume all rivers in the forest are potential Wild and Scenic candidates.

Planners should use an interdisciplinary team and public comment to determine eligibility. At the end of this process every river should be found either eligible or ineligible and there should be documentation to support the finding. This report should be in the Forest Plan.

The BLM should also complete suitability studies on all eligible rivers during the RMP process.

The planners must also re-assess prior eligibility evaluations in light of changed conditions, new information, and changed standards. . . .The values protected by the WSRA include "scenic, recreational, geologic, fish and wildlife, historic, cultural, or other similar values." 16 USC § 1271. By eliminating any rivers without significant recreation values, the 1976 study placed undue emphasis on recreation's importance under the WSRA. Old eligibility determinations should also be reviewed in light of changing circumstances, such as floods, increased recreation use, the listing of species under the Endangered Species Act, and other changes to the ecological and/or legal landscape since the original inventory was conducted.

4545

All rivers segments deserving protection should be fully protected by the BLM to preserve their character until Congress determines the final status.

The new RMPs should include strong direction on protection of eligible and suitable rivers. The RMPs should prohibit any activities prohibited under the WSRA on eligible or suitable rivers until a final determination is made by Congress. This should include withdrawal of all mineral rights in eligible or suitable river corridors pending a final decision.

**Comment Code****Comments**

- The new RMPs should also include direction on management of designated rivers, in the event that any rivers in the planning area are designated as Wild and Scenic. Direction should address topics such as natural and prescribed fire, noxious weeds, habitat function and connectivity, tree disease and pest control, upstream/downstream hydropower, flood control, bridges, noise, motorized use on the river and in the river corridor, as well as other traditional topics like timber harvest, mining and road building.
- 4560
- Specific rivers which have not been studied, but IRU believes are eligible for Wild and Scenic status include, but are not limited to: Big Jacks, Little Jacks, and Mary's Creek.
- Specific rivers which should be studied for suitability and which IRU believes should be designated as suitable include: Dickshooter, Lower Pole, Lower Camas, Yatahoney, and Battle Creeks. All of these creeks were listed as eligible in the 1993 Idaho Training Range River Eligibility Inventory.
- Also, the Jarbidge and Bruneau Rivers should definitely be proposed as additions to the National Wild and Scenic Rivers.
- 4610
- BLM must strive to remove eyesores from the BRA landscapes. As this is accomplished, BLM should apply more protective VRM standards.
- 4620
- Preservation of the darkness of night skies is an essential element of the wild land experience of the Owyhee-Bruneau canyon lands. The BLM should recognize the importance of this value in limiting the development of any facilities that will require artificial lighting.
- BLM must specifically commit to working to limit existing light pollution from the Air Force's Grasmere radar site.
- 4630
- BLM must designate all WSAs, all citizen-proposed wilderness and blocks of roadless lands greater than 5000 acres in size, and all ACECS as must be designated as VRM I.
- 4720

**Comment Code****Comments**

- A wealth of cultural sites are located in the BRA. Threats to these sites include increasingly easy road access leading to vandalism (roads such as the new signed AF No Drop 4 road, new road signage by Owyhee County making roads more noticeable); livestock-caused erosion of artifacts and sites - particularly in the vicinity of springs, seeps and other riparian areas; fence construction resulting in shifts of livestock use and new zones of livestock concentration and disturbance of rimrock blinds; lack of monitoring and patrolling of sites; increased human visitation to the canyon lands.
- Livestock harm and/or destroy cultural sites in many ways, including: trampling and soil compaction breaking artifacts and destroying site stratigraphy; erosion revealing artifacts to surface collection and cow trampling damage; erosion destroying site stratigraphy; defiling sites with large amounts of feces and urine. BLM must act to stop this damage in actions of the RMP.
- 4730 Survey a minimum of 20 sites each year to determine site condition and provide data for developing management actions.
- 4740 The best way to protect cultural sites from looting is to limit roading and motorized access to sensitive areas. BLM must analyze significant road closures, limit signing and road improvements, limit new livestock developments (which inevitably lead to increased roading), and take other measures to limit ease of looting and vandalism.
- Removal of signs such as the newly placed county road signs will better protect cultural sites.
- Livestock grazing needs to be carefully avoided in areas where culturally significant sites are located. Cattle can do a significant amount of damage to the vegetation and cultural resources if it isn't carefully managed.
- The BLM should consider designating new Archeological Districts and should seek designation of all sites eligible for protection as additions to the National Register of Historic Places.
- Eliminate or mitigate the negative impacts to cultural resource sites known to be experiencing the effect of deterioration.
- 4745 BLM must also protect cultural sites and paleontological sites.
- 4760 Develop management strategies to ensure preservation of cultural resource values within specific areas known to contain concentrations of unique or significant cultural resource sites.
- 4810

**Comment Code****Comments**

Lands in the BRA should not be available for commercialized wilderness rehab for delinquent youth. Jarbidge RA lands have been significantly damaged by these commercial delinquent groups. . .Disturbance to bighorn sheep, lekking sage grouse, and other wildlife by such commercial uses must not be allowed.

We oppose the disposal of public lands in the BRA. The RMP must focus on retention of lands, and BLM acquisition of private inholdings through purchase with Land and Water Conservation funds or other such funding.

In the 1980's BLM traded away any important land area (cultural values, sage grouse, springs) in the southern part of Little Blue Table to the state of Idaho. BLM must identify re-acquisition of these lands as top priority.

BLM's planning process must not authorize new utility corridors.

Provide updates on property disposal.

BLM should specify how it plans to address access to private property.

BLM should identify how it intends to handle existing and new requests for special use permits.

New rights of way should be prohibited, except those necessary to allow reasonable access to private property.

Ensure public access is allowed during all land tenure transactions.

4820

We are extremely concerned about the impacts of the Air Force's No Drop and Emitter sites on surrounding BLM lands. . . .BLM must use the RMP process to strengthen environmental protections as part of rights-of-way requirements, and must commit to monitoring of impacts.

we fear a proliferation of communications gadgetry on BLM lands. BLM should use a visual analysis of the impacts of the Air Force's Grasmere radar facility to understand just how widespread a visual impact on wild lands that towers can have.

The public lands of BPA and the SRPOBNCA are not appropriate places for larger military facilities, like the Grasmere Radar Facility, or for development of power generating facilities, like those recently proposed by IdaCorp for wind turbine location.

These public lands are not appropriate places for new or existing public and private waste disposal sites, or for storage or disposal of hazardous wastes, These actions should be strictly prohibited.

Any consideration of rights of way or special permitted uses must avoid WSAs, Wild and Scenic River corridors, ACECs, RNAs, ONRAs, SRMAs, and lands identified as having high cultural, biologic, geologic, paleontologic or other scientific and social values. These same areas should be excluded from development and designation of new roads and motorized trails.

**Comment Code****Comments**

4830

BLM must analyze the suitability of the communication site and windmills on Little Blue Table. The windmills intrude on wild lands scenery, are accessed by a long dirt road whose upgrading would have many negative impacts (sage grouse cultural, recreation) and are located in a culturally sensitive area.

Lands: Determine what lands should be retained in public ownership and what public lands should be made available for disposal. . . .The new Bruneau RMP needs to address this issue with a similar objective. However, more public lands than those identified under the Bruneau MFP should be made available for disposal.

Lands: Determine what lands should be retained in public ownership and what public lands should be made available for disposal. The new Bruneau RMP needs to address this issue with a similar objective. However, more public lands than those identified under the Bruneau MFP should be made available for disposal.

A strategy should be developed for purchasing or acquiring inholdings from willing sellers.

Within three years, develop and publish a prioritized list of highest potential purpose lands to acquire, and also an acquisition plan.

4840

Vegetation: Opportunity to trade/swap/sell Jack Creek Basin to take private land out of the middle of BLM managed land

Allowance of organized horse events, e.g. Endurance rides, Mounted Orienteering, Trail rides. This would include permitting staging areas, overnight camping, and rest/water areas. Also allowance of cross country horse travel during events, in both the BLM areas and the Snake River Birds of Prey area.

We ask that you withdraw this sensitive area from use as a communication facility.

BLM must strengthen environmental protection for all rights-of-way on BRA lands. Protections include: Limiting use during sensitive nesting, fawning, wintering or other periods of use for all native wildlife, assessing impacts of rights-of-ways on spreading exotic species onto surrounding lands and revocation of rights-of-way when weed infestation or wildlife disturbance results.

The Bruneau RMP should make public domain lands within such private pastures of the East Castle Creek Allotment available for disposal to the primary adjacent landowner(s) through direct sale.

**Comment Code****Comments**

The Bruneau RMP should make any public domain within the Riddle Allotment in the following townships and sections from the Boise Meridian and Baseline available for disposal to the primary adjacent landowner through direct sales: T13S R1E Sections 13, 24, 25, 26, 27, and 35; T14S R1E Section 1, 12, and 13; T13S R2E Sections 2, 8, 11, 13, 19, 24, 25, 30, 31, and 36; T14S R2E Sections 1, 2, 6, 7, 11, 12, 13, 14, 18, 23, 26, 27, 34, and 35; T13S R3E Sections 17, 18, 19, and 30; T14S R3E Sections 6, 7, 8, 18, 22, 23, 24, 25, 26, 28, 30, 31, 32, and 33; T14S R4E Section 34; T15S R4E Sections 3, 4, 9, and 10. The Bruneau RMP should classify the remainder of the public domain within the boundaries of the Riddle Allotment as land to be retained in public ownership.

Competitive events should be limited or prohibited on BLM land in these landscapes.

BLM should be very cautious in issuing special use permits for recreational or commercial purposes. Certain permitted uses, such as the troubled youth programs, should be required to pay for the monitoring necessary to make sure they are compliant with the terms of their use and prevent unnecessary resource damage. This may even include paying for a BLM staff person to accompany the group in their activities.

No land exchanges should be permitted to allow for any kind of large animal raising/processing operations of any kind.

Land exchanges or special use permits should not be allowed for new or expanded utility, communication, power generation, military facilities or other commercial operations where they do not currently exist.

Priority of acquisition will be toward lands that enhance wildlife, non-motorized recreation, and wilderness to complement existing lands.

Exclude land exchanges, sales, and transfers of any kind for large animal raising/processing operations.

Exclude new rights-of-way opportunities within all lands proposed for expansion of wilderness lands (citizen proposals), all WSAs, and all designated wilderness.

Exclude new rights-of-way opportunities in all lands or areas with crucial wildlife habitat, sensitive species, and important cultural/paleontological resources.

Prohibit the following activities on public lands: a) New public waste disposal sites.; b) New or existing private waste disposal sites.; c) Storage or disposal of hazardous wastes.; d) Dumping of fuel and other hazardous materials from aircraft operations above the resource area.

4845

Manage newly acquired lands for the highest potential purpose for which they were acquired. Manage acquired lands with unique or fragile resources to protect those resources.

**Comment Code**

**Comments**

- Develop management prescriptions for new lands.  
Exchanges or disposal of lands may be allowed as long as the net overall acreage of the resource area is not reduced by more than 2%.
- 5010  
Recreation: Provide better information on resources, access and restrictions. Visitors often have limited knowledge of area and need direction  
Recreation: I would like to be involved in trails selection  
Recreation: Spread out the recreation areas and don't concentrate  
Recreation: Rec use does not pay property tax in Owyhee county.  
Recreation: Purchased in Boise. Thanks. Owyhee county is stifled by/with recreation. Who pays or lost, hurt, "rec-ers"? We do the residents of Owyhee county- They don't. Thanks again.  
Recreation: Have BLM contact and consult with local equestrian groups to determine their needs and to be their assistance in putting in facilities  
Recreation: Use common sense in making resource decisions that affect recreation use  
Recreation: Make facilities for responsible users to curtail irresponsible use. Use peer pressure to enforce regulations  
We do not believe there is a need for specific development of trail systems, outhouse parking sites, increased signage, etc.
- 5020  
Recreation: Don't make campers coexist with cows in the camping site as on the NFK Owyhee
- 5040  
Recreation: Develop horse access area by Little Rabbit Creek on Highway 78 (Gerry Winter)  
Recreation: Develop horse access area north and south of Highway 78 for access to Sinker Creek drainage (Gerry Winter)  
Recreation: Develop parallel horse loading/unloading areas with off-road vehicle area (safety for new or green horses not use to ORVs), (Gerry Winter)  
Recreation: Develop horse access area by Initial Point (not for access to National Guard training area), (Gerry Winter)

**Comment Code****Comments**

Recreation: Develop horse access areas between Grasmere and Nevada line, especially for camping with reliable water supply, (Gerry Winter)

Recreation: Preserve, maintain and expand trails for equestrian use, including long distance trails- 10mile.

Recreation: Provide adequate trailhead parking for horse trailers

Recreation: Provide information on trails in the Fossil Creek area, specifically north of highway

Recreation: Provide better markings for trails

Recreation: Mark Equestrian trails with markers, provide gates through fences.

Recreation: BLM needs to maintain roads better for access to Snake River for horse trailers and develop some scattered staging areas. Develop them so horse trailers can get in.

Recreation: Same thing for some trails in Bruneau plan

Regarding Celebration Park it seems the instructions are you have to stay on the trail and don't have the option of leaving it. This may not be the case, however it needs to be clarified. If it is the case, then it is unnecessarily restrictive. There are lots of cows who do much more damage than all the recreationists combined. What I would suggest is that if there is an environmental impact problem that an equivalent trade of maybe 20 cows per 200 people (or whatever would be an equivalent) be done to eliminate the restrictions on recreation use, i.e. people, horses, mountain bikes, etc. So recreationists can be unrestricted. If there are certain areas that need to be protected, they should be blocked off individually rather than blocking entire areas, such as blocking the "trail-braiding" sections and leaving the one desired trail.

As a horseman, we need roads graveled to parking areas at locations near the canyon rims and or trail heads.

Permanent horse trails, with trail markers. There are many individuals and clubs that would volunteer time and material to create the trails and trail markers, with input and guidance from BLM staff.

Creation of permanent Trail Heads and Staging areas in appropriate areas, to allow parking and unloading of horses.

Loading/unloading areas for horses for day use require a well drained large parking area. Tie rails or corrals are not needed because riders tie horses to trailers for easy access to tack. Restroom facility is desirable for high use areas.

Camping areas for horse use are needed. A good supply of water for the horses is needed. Small corrals would be nice but riders can bring portable hot wire corrals to separate stock. Separated, pull-through parking areas would make camping nicer. Tie rails would be useful at trailhead areas. Restroom facility would be nice but not as necessary as at day use areas.

**Comment Code****Comments**

- Visitor developments and amenities should be limited to the periphery of the region and emphasized in neighboring communities to both help protect the resources and benefit the local communities' economies.
- 5045
- I would personally like to see continued unrestricted horse use and horse camping, as is currently the case.
- 5050
- Vegetation: Build a visitor center for the NCA  
Recreation: Post individual at the Swan Falls Substation to gather information so BLM could gather additional input  
BLM's focus in the BRA must be protection of biodiversity and wild lands values. We support increased interpretation to promote public understanding of values, but this should be limited to a very few sites in "front country" areas only, these should be small and mostly on existing routes.  
BLM should focus on public outreach and education (through news releases, presentations to local groups, educational outings, etc) as a key part of the recreational strategy of the RMP, and its future recreation programs.  
BLM should locate visitor services, visitor centers, and operational facilities outside the management areas and locate them in local communities. BLM should make available information of additional services in those communities.  
BLM should describe in detail the type of structures that will be allowed and the type that will not be allowed within various parts of the management areas. These structures should be limited to minor visitor facilities (signs, fences, etc) necessary for safety or resource protection. BLM should make use of existing infrastructure rather than developing new facilities. No concessions should be allowed in the management areas.
- 5110
- Recreation: Provide adequate motorized and non-motorized recreation opportunities  
Let folks walk anywhere they want.  
The BRA in its current condition presents a wealth of dispersed recreational opportunities - with abundant car-camping and backcountry camping sites. It is not necessary to construct trails to hike in this country.  
Recreational management must focus on maintaining the primitive nature of the canyon lands and plateaus in the BRA.  
Recreation opportunities for visitor exploration and discovery should focus on activities in an undeveloped, primitive setting.
- 5120

**Comment Code****Comments**

- Recreation: Paintball shooters- incompatible user-canyon  
Recreation: Population increases will result in higher use, very evident over past ten years. Need high profile enforcement- vandalism and shooting seems to be on the rise  
BLM should manage overnight camping and backcountry use to prevent impacts to resources.
- 5130 We request that all "roadless" federal lands, not currently designated as Wilderness, be reviewed for their importance to back country recreationists and considered for designation as Back Country Recreation Areas.
- 5140 Recreation: Initiate use of certified weed free hay, (feed), in BLM land, (Gerry Winter)  
Recreation: Try to reduce construction of new fences and stop locking of gates preventing access to public land, (Gerry Winter)  
Recreation: Enhance non-motorized recreation trails on Kuna Butte, (and surrounding Bruneau Dunes)  
BLM should consider a voluntary permit system for all area users, especially for overnight use.  
BLM should identify seasonal or permanent restrictions on backcountry use and camping to avoid damage to sensitive resources.
- BLM may also want to consider limiting camping to designated areas.  
Rock climbing should not be allowed where it would harm archeological, paleontological, geological, biological or other resources.
- Recreational collecting of objects should be prohibited, unless expressly permitted for specific items from specific locations.  
BLM should encourage non-motorized transportation to destinations by establishing trailheads for hiking, bicycling, walking, horseback riding, sightseeing and wildlife viewing.

**Comment Code****Comments**

5210

The proximity of the NCA to the population centers of southwest Idaho creates a built in demand for the use of the recreational resources of the NCA. . . .We believe these resources should be used in a manner that perpetuates the values while providing safe and satisfying experience for the visitors. Our concerns are these. - That the alternatives address the level of on-the-ground contact by BLM personnel, (Rangers, Naturalists, Volunteer Hosts, Etc.) to meet visitor and resource needs. -That the alternatives address the need for visitor facilities such as camp sites, visitor information centers, signing Etc.. -That shooting restrictions be studied and alternatives be developed to insure the safety of the visitors and the protection of all wildlife species. -That the alternatives consider the need for road and trail improvement and/or closure, so that both access to and protection of the resource values are weighed.

General Management: BLM biased in trail inventory. Already decided there are too many trails.

If there is a current law against something there is no need to write it again- don't lock out everyone if just a few are doing wrong, I.e., littering. It would be better to work with law enforcement than the affect the 99% who are doing thing right. For example, motorcycle riders usually stay on the trails as they are supposed to but there are a few who are seen going across the brush. That shouldn't be a reason to lock out all motorcycle riders because of the few who are breaking the rules.

Four wheel drive and high clearance vehicles are the number one way most Americans see BLM land.

Trail riding by four wheel rive vehicles is a legitimate land use activity and has not 'less' right to public land than other uses including environmental protection.

Four wheel drive vehicle use can be compatible with environmental issues.

A motorcycle or ATV trail is not the same as a four wheel drive trail.

A county road or BLM byways is not a four wheel drive trail.

Please involve us (me) when you decide to close trails. Let us help choose what trails to close. When you use the excuse that you are closing duplicate trails or parallel trails or multiple tails that go to the same place, include us in the decision making process. I am not against closing certain trails, I would just like to be involved in choosing which ones are closed.

Please allow opportunities to reopen trails if they have been closed. Sometimes a trail needs to be closed for erosion, fire or wildlife concerns, we know that, but allow consideration for reopening them if the reason for closure has changed. Maybe we could rotate trail closures.

**Comment Code****Comments**

5220

Understand that four wheel drive trail abusers do not reflect all of us. DO not rob legal trail users of their opportunities just because a few abuse the right. This is what enforcement is for. Consider other options to abuse rather than gates and lock outs. Again, involve us (me).

OHMV usage must be designed to encourage the safety and protection of public land users.

We request that the document and decision-making reflect citizens support for motorized access and recreation.

Recreation: Restrict ORV/ATV areas so less impact to the land and less conflict with hikers and bicyclists

Recreation: Control ATV use. Hunters are hunting from ATV's and traveling around in sensitive areas.

Concerned about ATV damage

Understand that reducing the number of trails concentrates use. More trail miles can spread out use.

How will the BLM manage both authorized and unauthorized ORVs/ATVs access throughout the SRBOPNCA? How will the BLM prevent breaches of road closures in sensitive areas by ORVs/ATVs.

In general, unregulated and unsanctioned motorized vehicle use on public lands is incompatible with soil and aquatic resource management , wildlife habitat management, and the protection of other people on or near public lands.

...Within the SRBOPNCA, how will the BLM manage both short and long-term access of motorized traffic, including motorcycles and 3-wheel drive vehicles (ATVs and SUVs) and prevent unrestrained access through streams and other sensitive areas within the project area?

We are quite concerned with the proliferation of ORV use and other motorized use in the Owyhee Front Country. . . .BRA use is escalating and new damage is occurring every day. We do not want to see the Bruneau end up with complete sacrifice areas such as Hemingway Butte and its surroundings.

BLM must end all ORV races in BRA lands. Holding an ORV race in wild lands causes irreparable damage. Trails driven by modern high-powered motorbikes have their soils pounded into concrete, with permanent damage to soils, and vegetation. Where trails go up hills, gully formation processes are set in motion. Plus, both the racers and spectators are enticed to re-visit the lands where races occur - with use proliferating in areas where races are held.

**Comment Code****Comments**

I would like to say that witnessed OHV abuses have on several occasions been a personal affront to my sensible ideals of the way public lands are currently managed. I recommend BLM personnel walk into Avondale Basin located about 1.5 miles NW of the New York summit area off the main Murphy to Silver City road to see widespread erosion banks and vegetation destruction.

The OHV users of Avondale Basin regularly drive through and around snow obstacles causing long standing damage to the soils and vegetation of the meadows. I would recommend that these high altitude trails be closed to recreational OHV use, posted and patrolled. The ranch permit holder however should be allowed to use these trails for ranching duties.

I find that these noisy machines are a very real conflict with my enjoyment of primitive recreation in natural areas.

ORV use must be designed to encourage the safety and protection of all public land users. Such use must be eliminated from sensitive areas and areas identified for the protection of biological, geological, paleontological, cultural and other resource values.

The Wilderness Society opposes commercial and recreational competitive use of these resource areas for motorized vehicle racing. This type of use is incompatible with the values and resources found in these areas.

OHMV use must not be allowed in areas with sensitive or highly erodable soils. Also OHMV use in other areas should not be authorized at times when soil conditions are typically inappropriate (moisture content, etc.).

OHMV usage must be eliminated from sensitive areas (riparian/spring areas, locations where sensitive species are known or believed to exist, near cultural values, etc.).

Official races of OHMVs must not be allowed. The competitive nature of such events and numbers of users means the level of resource degradation is accelerated greatly.

Minimize habitat deterioration and disturbance to big game by limiting OHMV use in big game habitat.

We are quite concerned with the proliferation of ORV use and other motorized use in the Owyhee Front Country. The impacts of OHVs on native plants is negative.

The Lower Snake River District BLM already has several total sacrifice areas for ORVs located in the Owyhee Resource Area. BLM must continue to focus on these destroyed lands for ORV uses, and by no means develop new ORV access or trails in the BRA.

Agencies should recognize that many roads and trails were not originally laid out with recreation in mind and that changes should be made in some road and trail segments to address environmental and safety problems. In most cases, problems can be mitigated to a reasonable level and closures can be avoided.

**Comment Code****Comments**

5230

Do not count highways, interstates, federal, state, or county roads, motorcycle, ATV snowmobile, mountain bike, equestrian or hiking rails as your contribution to us. Do not count them in total trail mileage available for four wheel drive use. What we are looking for are jeep trails, challenging two track trails that take us deep into the back country or to scenic overlooks.

Be more skeptical of claims that four wheel drive vehicles disturb wildlife. I am aware that certain wildlife are more sensitive to intrusion and human disturbance at certain times of the year. This usually doesn't necessitate year round closure of a trail.

We are aware of no off-road lands in the BRA that are suitable for an "Open" designation.

We request that the analysis adequately evaluate the type and quality of experiences that motorized visitors enjoy and want maintained in the area.

Each road and trail should be inventoried and viewed on the ground to determine its recreational value and any significant problem areas that require mitigation measures.

Each road and trail should be evaluated for its value as a motorized loop or connected route.

Each road and trail should be evaluated for its value as a source of dispersed campsite or as access for all multiple-use visitors.

Site-specific analysis should be provided for every road and trail so that the benefits of keeping each motorized travel way is adequately addressed and accounted for in the decision. We request that the mapping be sufficient to allow site-specific analysis.

Comparing man-caused impacts to natural impacts is a reasonable approach that should be used to test for the significance of impacts and improvements. We request that impact analyses in all resource areas compare the relative magnitude of man-caused impacts to the background level of naturally occurring impacts.

We request that sufficient background data be collected to quantify the existing conditions in the resource areas of interest. Then, if a motorized closure is enacted, sufficient data should be collected to demonstrate whether or not there was significant improvements to each resource area. If significant measurable improvement cannot be demonstrated, then, in order to be accountable, motorized closure actions should be reversed.

The environmental document should accurately address the significant negative impacts associated with disturbing existing stable roadways in order to obliterate the existing roadbed. A reasonable alternative would be to reclassify the road to either restricted-width or unrestricted-width motorized trail. We request that the preferred alternative make practical use of this management tool and the benefits that it provides

**Comment Code****Comments**

Many environmental documents have not taken into consideration that motorized multiple-use designation serves all recreation activities, instead of just a few. . . .We request that the analysis and decision-making fully recognize all of these activities and the cumulative impact that closing roads and trails has on all multiple-use recreationists.

We request that wildlife mortality from OHV activity be considered minor and that wildlife mortality not be used as a reason to close roads and trails to OHV visitors.

We request that adequate consideration be given to a comprehensive inventory and analysis of all non-system roads and trails and the current recreational opportunity to motorized recreationists that they provide.

Agencies are encouraged to add all existing trails that are not on the trail system inventory to the trail inventory.

Agencies are encouraged to return trails that used to be on trail inventories to the present inventory.

Agencies are encouraged to avoid road and trail closures based on wildlife concerns except where negative wildlife impact can be specifically identified and documented. Motorized use on existing trails has little or no verified effect on game animal welfare. In fact, some of the areas more intensely visited by motorized visitors have experienced significant increases in wildlife populations; further substantiating the fact that motorized recreation does not create a significant impact on wildlife.

5240

Recreation: Allow cross-country OHV travel for game retrieval

Recreation: Close all non-designated ORV/ATV areas to ORV's- don't allow the reign

Do not "fix" every trail just to placate every person who just bought a new SUV and doesn't want to scratch it.

Several years ago Congress allocated a portion of the fuels tax for vehicle trail development and off road use. While most of this money comes from cars and trucks most of it is used for motorcycles and ATVs. Let's use some of this money for gates that can be OPENED and closed to control sensitive areas and abuse. The key word being OPENED unless absolutely needing to be closed.

All roads in the BRA should simply be designated as "Closed" to ORVs - unless they are specifically signed as "Open". A Travel Plan map should be developed as part of the RMP process.

Regulation of ORV use and restriction of ORVs to designated routes that do not conflict with scenic, natural and cultural values; and ORV policies similar to those suggested for the Bruneau, above.

Please Ban ORVs from all existing roadless areas.

**Comment Code****Comments**

These landscapes should be untouched by development, paved roads, and excessive dirt or two-track roads. There should be clearly delineated areas and trails for damaging use such as dirt bikes, all-terrain vehicles and other motorized recreation.

I support OHV access to the areas in question. I would like to see continued access at its current level with the possibility of expanding trail networks to avoid sensitive areas.

Public access points should be made available. Access points such as parking areas for trail heads, put in points and equestrian ETC. Central access points allow trail networks to function and limits random parking.

Small open riding areas of 80 to 100 acres should be allowed. These would be areas that allow overnight camping and OHV activity to take place. A defined area is better than the undefined and would help centralize users.

Off road competition such as Hare N Hounds, Scrambles, ATV and Jeep tours should be allowed to continue. Land should be provided on a rotational basis per event. Sponsoring clubs should no-longer be required to double up on routes in the same year. Courses should be provided with rotational use in mind.

The BLM should end ORV races in BRA lands.

ORV use should be limited to only existing roads, and only within certain areas away from rare plants and high quality vegetation. Any trails off the designated roads must be slated for restoration.

In order to avoid further cumulative impacts, we request that the closure of an existing motorized route be offset by the creation of a new motorized route.

In order to avoid contributing further to the significant cumulative loss of motorized recreation and access, we request that the closure of a motorized trail or access should be offset by the creation of a new motorized trail or access of equal value.

Motorized recreation opportunities have been eliminated as part of timber sales. Now as mitigation measure to offset the past cumulative impact of these actions, we request that motorized trail systems be developed using existing timber sale roads and trails.

Agencies are encouraged to maintain availability of all existing trail systems to motorized visitors.

Provide open or play areas for motorized recreation opportunity and trails bikes in selected places where acceptable.

Agencies are encouraged to provide opportunity for "motorized loop trail systems" to lessen impact and provide a better recreational experience.

Agencies are encouraged to allow use of specific roads for OHVs that are not licensed for the street use in order to develop a network that ties OHV trails together.

**Comment Code****Comments**

Agencies are encouraged to utilize standardized trail signing and marking so that the public is not confused. Trails closed unless otherwise marked open are not reasonable. Trails, when closed, should be signed with an official, legitimate reason.

Agencies are encouraged to utilize all trail maintenance and upgrading management techniques, such as, bridging, puncheon, realignment, drains, and dips to prevent closure or loss of motorized trail use. Trails should not be closed because of a problem with a bad section of trail. The solution is to fix the problem area or reroute the trail, not to close it. If funding or manpower is a problem, then other resources should be looked to including local volunteer groups, state or national OHV funding.

Agencies are encouraged to clear trails early in the year to insure maximum availability and reduction of diversion damage caused by routing around obstacles.

Agencies are encouraged to avoid yearlong trail closures if wildlife concerns are valid only during certain seasons. In these instances, closures should be seasonal only with the dates consistent with the requirements to protect wildlife.

Agencies are encouraged to avoid trail closures associated with other actions including closures in the past have resulted from these sorts of past actions. Loss of motorized trails because of past timber sales should be mitigated by connecting old and new travel ways to create a loop trail system.

Agencies are encouraged to re-establish and/or relocate all trails and roads disturbed by other actions such as timber harvest, mining, and livestock grazing.

Agencies are encouraged to align non-motorized area boundaries so that they do not encroach or eliminate trails located at the edge of the boundaries.

Agencies are encouraged to provide for motorized trails and vista points on the boundaries outside of the non-motorized areas so that motorized visitors can view those areas.

Agencies are encouraged to correct the signing at trail heads that suggests that motorized visitors are more damaging than other visitors.

Agencies are encouraged to keep trails in proposed non-motorized/wilderness/roadless areas open. Motorized-use on trails in these areas does not detract from the wild characteristics in the proposed non-motorized/wilderness area. Additionally, the Roadless Rule specifically allows for OHV activity in Roadless areas.

Agencies are encouraged to avoid the closure of trails to motorized use as the "easy way out" in dealing with problems.

Agencies are encouraged to implement a standard signing convention that is easily understood. For example, there are often misunderstandings about seasonal motor vehicle restrictions due to the "No" symbol with the actual closure period shown below in small text that is often not seen or understood. In this case, the road or trail is open except during the period below.

**Comment Code****Comments**

5310

BLM must identify methods of road closure and restoration.

When considering developing any new "road" on public lands, the BLM should implement an Environmental Assessment at a minimum, and involve public participation.

5320

Minerals: Vehicle access is important for rock hounds, (disabled), who wish to access area, (average age 60+ years)

Minerals: There may be seasonal reasons, (for example, winter-early spring) to close roads to prevent tearing up the road

General Process/Other: Access to all areas, especially rock hunting areas is very important. Without access this hobby is closed to the majority of our senior member who need to be able to drive within half mile of collecting site. Without access out lands will become useless.

Concerned about "closing the land off." Keep roads open, but don't build new roads.

The plan will ensure that no termination of access for the public is considered or implemented on the public trails, ways, roads, and rights of way in use or asserted under RS 2477.

Handicapped, elderly, or physically impaired, can only recreate on motorized roads and trails and recreation opportunities should be considered for them.

The preferred travel management alternative should not restrict motorized access and recreation to narrow corridors along a few major roads. This restriction would not provide for the type of experiences that most motorized visitors are seeking and, therefore, does not meet the needs of motorized visitors. We request that the analysis and decision-making avoid restricting motorized access and recreation opportunities to narrow corridors along major roads.

5330

HR2974 will create unenforceable laws that will be interpreted differently by region. Would like to see map with all roads that are being considered for closure.

The BLM should establish a monitoring program and undertake relevant transportation studies to understand how increased visitation has impacted the natural resources of the landscape. The need to address sightseeing/recreation routes and facilities should be considered and appropriately addressed to direct people to areas while preventing resource damage.

**Comment Code****Comments**

. . .hikers disturb elk more than motor vehicles and "disturbance of wildlife" should not be used as a reason to justify motorized recreation and access closures. Additionally, when there are concerns with wildlife disturbance, restrictions on hikers should be given a greater emphasis than restrictions on motorized visitors.

The term "unclassified road or ghost road" may give the impression that these roads evolved illegally. We request a clarification in the document that travel ways with these origins are legal travel ways. Additionally, we request that these roads and trails continue to provide recreation opportunities for motorized visitors and that mitigation measures be used, as required, to stabilize or address any concerns.

the look and feel of motorized trails is not significantly different from non-motorized trails and the environmental impacts should be considered equal and addressed equally.

We request that the process include consideration of the negative impacts that proposed motorized road and trail closures will have on fire management, fuel wood harvest for home heating, and timber management. The analysis should include an analysis of the benefits to the public from the gathering of deadfall for firewood from each of the roads and trails proposed for closure.

5340

Wildlife: From S.F. Dam to pump station - sportsman's access road, so it can be better maintained. Need designation from F&G, ID Power, BLM

Recreation: Provide road access to trailheads

Recreation: Establish public access to BLM land from south end of Can-Ada Road, (Frisch property)

Recreation: Create access in the Bruneau Area, (also protest WSA's)

Recreation: Lock gates on new AF roads for wildlife disturbance and spread of weeds, (cheat grass etc.), and stop creation of new roads and trails from improved roads

Recreation: Access through private- for recreation- to Deep Creek and Owyhee river and Dick Shouter ridge.

Minerals: May be useful to designate areas for certain types of ATV (off road) use so that they don't destroy other areas.

elimination of unnecessary roads should be considered and restored to favorable habitat for area wildlife. This would also aide in the recovery of the endangered species that inhabit the area.

Recently installed street signs along highway 51 should be removed.

**Comment Code****Comments**

Parking areas or turnouts should be located in areas that have already been disturbed and should not damage natural, cultural and scenic values in their location. Informal, unofficial or undesignated parking areas and turnouts should be closed and restored.

Safety signs and posted speed limits along major routes, like the Mud Flat road, should be installed and maintained for the safety of visitors. If necessary, temporary safety signs should be located along the road to warn drivers of hazardous conditions, like excessive gravel, water, cattle and other obstacles along the road.

BLM should only designate administrative routes after detailing the specific use for the routes and a clear direction to close and rehabilitate the route once the purpose no longer exists.

an alternative communication method could include posting of the roads and trails proposed for closure with signs for a period of 1 year prior to the EIS process stating "Road or Trail Proposed for Closure, for more information or to express your opinion please call xxx-xxxx or send written comments to xxxxx.

We request the agencies to support and use mitigations and education as a means to address and mitigate problems rather than closures.

5345

The RMPs must include scientifically based standards dictating when new road construction will be allowed and when roads should be decommissioned. It should include an objective set of criteria with which the BLM should evaluate every proposal for new road construction.

5350

Recreation: Ensure that W&SR designation provides continued road access for rock hounds

Recreation: Keep ORV's to existing trails in the Bruneau Area

Recreation: Maintain access for 4x4 vehicles in addition to ATV's motorcycles

Recreation: Create the travel plan and ORV use plan

Recreation: Create a travel plan based on authorized routes not excluded areas or routes

Recreation: Consider all hobbyists and recreationists in decisions being made such as rock hounds and picnickers, photographers, birders, horse people, hikers, etc. There are hundreds of them.

Minerals: Anytime you close an areas to public access, it becomes worthless to the public.

**Comment Code****Comments**

ORV operation limited to maintained, established roads only with all the ghost roads permanently closed.

If landowners block long-used accesses, BLM's RMP should specify purchase or outright condemnation of private lands if they are an impediment to long-established public access.

ORV use should be limited to only existing roads, and only within certain areas. Any trails off the designated roads must be slated for restoration.

BLM must deal with ORV/OHV designations and specify road closures as part of the RMP process, not drag it out over 10 years as happened with the ORMP.

...concerned about "closing the land off".

...keep roads open-but don't build new roads, also let folks walk any place they want.

There should also be a limit to areas where passenger vehicles and All-Terrain Vehicles are allowed for travel. Valuable vegetation shouldn't have to be destroyed by unnecessary vehicle traffic.

ORV Travel Plans need to be developed and enforced. I have witnessed dirt bikes traveling cross-country in many areas, which has to be detrimental to the soil and plant communities, to say nothing of animal populations.

Development of an ORV Travel Plan and a "Closed, Unless Signed Open" road policy;

I wonder if it is possible to develop a travel plan similar to the Forest Service where some of the side roads in special areas could be closed?

BML must develop ORV Travel Plans, and "closed unless Signed Open" roads must be regulated and restricted.

Through this planning process the BLM should designate a transportation network that retains the minimum amount of routes necessary to provide for reasonable access. Extraneous, duplicative, unstable or little used routes should be closed and rehabilitated. Existing routes should not be upgraded and no new routes should be constructed, unless for relocation purposes to protect resource damage.

Motorized vehicle use off of designated routes should be prohibited and enforced, especially in WSAs and other identified sensitive areas.

The BPA and the SRPOBNCA must be immediately closed to cross-country indiscriminate travel. Motorized travel must be limited to designated roads and trails only. Motorized vehicle use must not be allowed in areas with sensitive or highly erodable soils, or at times of the year when soil conditions are inappropriate for such use.

**Comment Code****Comments**

The BLM must develop a travel plan and associated maps and educational materials for recreational motorized use. Enforcement of the regulations must be a top priority for the BLM.

Designated routes should be established and the BLM should strongly consider routes as being closed unless posted open.

BLM should work to assure public access to public lands in areas with no resource conflicts or impacts.

The BLM should maintain and promote for public use all historic and existing roads, trails, and rights of way. Inherent in this plan of maintaining and promoting public use of these historic and existing uses is dedicated "open access".

the plan must be developed in a way that maintains access to the federal lands for the members of the public who use them for their livelihood as well as for the recreational users.

Exclude ACECs, SRMAs, Section 202, and other special lands from development and designation of new roads, or jeep trails.

All routes and existing trails which are currently open should remain open if trail inventory is taken. Trails should not be excluded from use because they were missed during the inventory process.

Furthermore, all routes such as cow-trails, ravines, creek bottoms, two track roads and etc. should not be excluded as an existing route without public involvement on a case by case basis.

BLM must deal with ORV/OHV designations and specify road closures as part of the RMP process. . . .We are aware of no off-road lands in the BRA that are suitable for a general "Open" designation.

A large number of the roads in the wild lands of the Bruneau were pioneered or constructed only because they allowed ranchers to drive salt blocks or because they access cattle installations. Sadly, incursions on unroaded lands (leading to new routes) are routine. Roads and jeep trails whose primary purpose is placing salt or checking on a water trough should be closed and restored/obliterated. . . .BLM must identify methods of road closure and restoration.

The RMPs should also include direction on when existing road should be decommissioned. . . . The RMPs should also require establishment of a road decommissioning fund.

We request that significant human environment issues involving motorized recreationists be adequately considered and weighed in the travel management process.

Because most OHV machines are not street legal, they cannot be legally ridden on forest roads unless they are designated as dual purpose roads. The proposed action must include these designations in order to provide a network of OHV routes. An adequate Travel Management alternative should include a system of dual-purpose roads, and OHV roads and trails that interconnect.

We request that travel management process be practiced in a manner that does not put motorized visitors at a disadvantage.

**Comment Code****Comments**

A fair travel management process would start with a comprehensive inventory of all existing motorized routes. In order to avoid further cumulative loss and significant impact on motorized access and recreation opportunities, we request that the travel management process include a preferred alternative based on preserving all existing motorized routes.

We request that travel management alternatives be developed with the objective of including as many roads and trails as possible and addressing as many problems as possible by using all possible mitigation.

Most of the motorized roads and trails in the project area have served as important public access routes since the turn of the century. . . We have observed that these travel ways are currently significant recreation resources for motorized visitors in the area including ATV, motorcycle, and four-wheel drive enthusiasts. Many of these travel ways have right-of-ways as provided for under the provisions of Revised Statute 2477. . . We request that these travel ways remain open based on; (1) their history of community access, (2) the access that they provide to interesting historical sites, and (3) their significance to community access. We request that the document evaluate all of the issues surrounding RS 2477 including the cumulative impact of all past closures of RS 2477 routes.

We request that any routes proposed for closure and in existence before 1976 be considered as having RS 2477 rights-of-way in order to provide citizens with access to public lands.

We are concerned about the way that area closure is approached in the planning process. Past actions have closed many roads and trails to motorized recreation and access without addressing the merits of each one. . . We request that the decision-making be based on the individual and site-specific merits of each travel way.

In areas where OHVs must use a roadway, a reasonable travel management alternative should include the designation of dual-use roads.

We are concerned about the preservation of old mines, cabins, settlements, railroads and other features used by pioneers, homesteaders, loggers, settlers, and miners. These are important cultural resources and should not be removed from the landscape. . . We request that our local western culture and heritage be protected and that the preferred travel management alternative include opportunities to visit these features as part of motorized interpretative destinations and loops.

A reasonable travel management alternative would use area closure to prevent the creation of unwanted trails by visitors and, at the same time, allow the public to use all of the existing motorized routes. . . We request that the preferred alternative be based on the existing motorized routes considered to be an important resource by motorized recreationists.

A reasonable Travel Management alternative would maintain existing travel ways that provide motorized recreationists with a system of loops and destinations. The preferred alternative should provide access to motorized looped trail systems, destinations, and motorized access to areas located outside the project area.

**Comment Code****Comments**

There is a significant need to standardized signs within and across all agencies. . . .We suggest that travel management signs be made easier to understand and standardized.

there is also a significant need to standardize or simplify seasonal closure dates as much as possible. We suggest that the number of different closures periods should be kept to a maximum of two, if possible, in order to avoid confusion and resulting misunderstandings.

Agencies are encouraged to insure that access to trails is not blocked by private lands and that private landowners do not have special access privileges. Where private landowners have elected to block public access to public lands, the boundary between that landowner and public land should be closed to motorized access ("boundary closure"). Motorized access for the public on the public lands side should remain open to the boundary closure and the acquisition of public right-of-way should be pursued with the private landowner.

Agencies are encouraged to keep motorized access through private land open to the public. Every public access closure through private land should be challenged and protected by asserting legal right-of-ways. The cumulative impact of this lack of action has created private motorized reserves on public lands or defacto wilderness/non-motorized areas.

Implement seasonal closures, where required, with input and review by OHV recreationists that will: (1) provide the maximum amount for OHV recreational opportunity during the summer recreation season in order to disburse all forms of trail use and thus minimize impacts to trail users; (2) provide winter OHV recreation opportunities in low-elevation areas that are not critical winter game range; (3) provide OHV recreation and access during hunting season by keeping major roads and OHV loops open while closing roads and trails necessary to provide reasonable protection of game populations and a reasonable hunting experience; and (4) provide OHV recreation opportunities during spring months in all areas where erosion and wildlife calving conditions reasonably allow.

Standardized or simplify seasonal closure dates as much as possible. The number of different closures periods should be kept to a maximum of two, if possible in order to avoid confusion and resulting misunderstandings.

Motorized recreationists would be willing to accept area closure when necessary to protect the natural environment in exchange for a reasonable network of OHV trails.

In areas where OHVs must use a roadway, travel management plans should include the designation of dual-use roads to allow OHVs to move from one trail segment to another.

Motorcyclists enjoy riding single-track trails. Motorized single-track recreation trails are limited at this time and continue to decline. Some BLM and FS districts do not differentiate between ATV and motorcycle trails in their travel plan. Travel plans should differentiate between ATV and motorcycle trails and single-track trails that are not appropriate for ATV use should be kept open for motorcycle use.

**Comment Code****Comments**

Agencies are encouraged to treat other visitors such as hiking, horses and mountain bikes as a form of transportation, just as motorized recreation is a form of transportation.

Agencies are encouraged to recognize, in the form of access, groups who expend effort and money in maintaining and improving roads and trails.

Close all public lands to Off-road vehicles unless signed as open. Only allow Off-road vehicle travel on established routes.

If it's a WSA it should be closed to motorized vehicles. If it's a roadless area that may be eligible for WSA status it should also be closed to motorized vehicles pending an official determination of its future.

Develop an ORV Travel Plan, and "Closed, Unless Signed Open" road policy as part of the RMP. ORV use must be regulated, and restricted to designated routes that DO NOT conflict with scenic, natural and primitive recreation values.

Develop an ORV Travel Plan, and "Closed, Unless Signed Open" road policy as part of the RMP. ORV use must be regulated, and restricted to designated routes that DO NOT conflict with scenic, natural and primitive recreational values.

Close all public land to ORV travel unless otherwise posted as "open". Make every effort to keep ORV's out of WSAs.

Outline a system consistent with federal regulations that require the BLM to minimize damage to natural resources and wildlife and to prevent damage to wilderness suitability, by designating specific routes and open travel areas.

5360

BLM must rein in the overkill actions of the County and local Highway Districts in road maintenance. The Mud Flat Scenic Byway is the classic example of overkill in maintenance that results in blading willows, blading huge bare swaths (weed corridors) on the roadsides, and unnecessary drainage furrows hundreds of feet long in relatively flat terrain. BLM must try to maintain and promote native vegetation on roadsides.

The BLM should establish maintenance agreements with the county, Air Force and/or road districts to conduct their road maintenance in the least impacting ways possible.

Cattle guards, culverts, bridges and gates should be maintained in good and safe condition.

5410

Idaho National Guard: Fires make more money

Idaho National Guard: Fires create jobs

Idaho National Guard: Manage the land to protect birds of prey habitat above all others, like cattle.

**Comment Code****Comments**

5420

The Bureau's policy on military live firing impact areas is of concern to us and should have a full airing during the planning process. We are very concerned that should the 60,000 acres inside the ring road be withdrawn, that the opportunities for raptor management will be hampered or eliminated.

Idaho National Guard: Nothing in the RMP should threaten the visibility of the training range or weaken our national defense

Idaho National Guard: End ground squirrel shooting--prey based for raptors.

Idaho National Guard: End tank training-sets fires, damages vegetation, animal burrows, etc...

Idaho National Guard: End grazing on lands that are used for training purposes, multiple disturbances have cumulative impacts that lead to weeds and habitat loss.

The Army National Guard's Orchard Training Area is situated in the midst of the NCA. We believe the training activities there may be having a profound adverse effect on the raptors, their prey and their collective habitat. The concerns we think should be addressed are: -The impacts that artillery firing has on prey hunting by raptors. - The same attention should be given to the live firing on the automated range. -Fire has historically occurred as a result of these activities. We believe this problem should be integrated with fire strategy as noted. -off road maneuvers involving both wheeled and tracked vehicles . . .is detrimental to both soil and vegetation. May also disrupt the hunting activities of the raptors. . .This use is also a potential fire hazard and should be coordinated with the fire alternatives.

BLM must critically examine the National Guard training area within the BOP, and detail in the RMP what all BLM scientist candidly admit when "off the record" --- I.e. The National Guard Orchard training area has been the source of a tremendous number of the fires that have spread and consumed native plant communities critical to the prey base for raptor species. It is time for this incendiary training to stop.

5440

National Guard: Make sure ordnance areas are well signed in non-road areas

National Guard: Close the North area of the training range to ground squirrel hunting.

National Guard: Make maps for public use areas within the guard range

National Guard: Add signage telling public to pick up their trash!

National Guard: Tour of OTA for public showing/informational education of environmental protection and monitoring activities compatibility with military training

**Comment Code****Comments**

Idaho National Guard: Continue grazing

Idaho National Guard: What not in use should open it up to predator hunting. A simple updated sign would let the public know who.

5500

General Process/Other: Eliminate use of M44s on public lands.

BLM must outlaw any use of 1080 or other poisons for any purpose in the BRA. BLM must outlaw aerial gunning of coyotes - which causes intrusive disturbance in wild land areas and disturbs sensitive wildlife species and recreationists. All activities of Wildlife Services (a.k.a. ADC) can damage public lands.

BLM must propose alternatives that remove all WS activities from BRA lands. Removal of native predators only results in MORE predation problems, and upsets the social structure of coyotes or native predators.

If a rancher claims a predation problem, then that rancher should be responsible for protecting livestock by increased herding and vigilance. If the rancher is unwilling to do that, that rancher's livestock should be removed from the public lands.

As part of the new RMP, we ask that BLM prohibit all lethal activities billed as "research" by WS on Bruneau lands. There are several reasons for doing so: . . .removing resident predators only causes more naïve, and typically more damaging, predators to move into areas where resident predators have been removed. . . .The lands of the Bruneau are nationally significant . . .Lethal removal of predators from these significant landscapes will detract from their value as scientific reference sites. . . . WS activities such as killing sage grouse predators will occur during critical nesting, fawning, and brood rearing periods for native wildlife, including migratory birds. . . . WS activities will harm recreational use and enjoyment of public lands.

Please apply all of the above arguments (killing created predator imbalance, national significance of lands and their value as a reference area with intact predator-prey systems, violation of MBTA/disturbance to native wildlife no matter what time of year killing is conducted, harm to recreational use and enjoyment of public lands) to our previously submitted comments requesting that the RMP planning effort prohibit WS activities on Bruneau lands. These activities include aerial gunning, trapping, calling and shooting, and poisoning.

Attached are also our comments on the use of M-44s and sodium cyanide in which we expand on the many arguments made above. Please apply these to the RMP planning effort.

**Comment Code****Comments**

BLM should define specifically what, if any, animal damage control or predator control activities will be allowed and in what manner. The Wilderness Society opposes all animal damage control, predator control and wildlife services proposals made to date. The majority, if not all, of these types of activities are not appropriate and should not be allowed on public lands. BLM should allow control actions to be taken only to deal with individual offending animals rather than indiscriminate killing of entire populations. BLM should strongly consider non-lethal methods of deterrence, removal of conflicts and behavioral pattern changes before any wildlife control measures are approved.

5600

Recreation: Many hunters use the areas, ensure continued access and less forage competition from cattle. Most of the antelope hunters use a water hole and a blind of sorts in their attempt to harvest an antelope and Fish and Game has indicated to me that most of the water holes are located on BLM ground...There are a number of problems that take place each year more and more frequently. Irresponsible hunters leaving thief blind material at the water hole site year around is one. Another is that some hunters feel that because they have hunted a specific particular hole prior to their arrival, tempers flare and materials get destroyed and or stolen. Is there anything in the works at BLM that may address the problems in the desert during this time of year? During Bear season, you have to purchase a bait tag and attach it near your bear site serving a couple purposes, one to identify who hauled in what and to enforce them removing any materials that can not be left after season. I think this same concept may have merit in hunting antelope as well.

Another issue is that some hunters are going in and setting up blinds in April or May. I believe there should be a time restriction from BLM as to when it is permissible to erect a blind on Public ground.

Another thought is to have the hunter come in to either Fish and Game or BLM and register the water hole they plan on hunting, thus eliminating the uncontrolled yours/mine thing going on.

BLM should ban the construction of antelope blinds on public lands - we have seen too many instances of cross-country travel, junk piles left behind, and even digging out of wetland sites to produce pits.

With the populations of raptors and prey decreasing we suggest the even far out solutions might be considered. These might include actions such as hunting restrictions on ground squirrels and jack rabbits reintroduction these critters in depleted areas.

All BLM alternatives in this RMP effort must include ending all ground squirrel shooting in this BOP.

5620

**Comment Code****Comments**

- I saw an incredible amount of damage done by "off road" vehicles not to mention fires that were caused by them, (once caught on fire), and other problems caused by so called "hunters," killing Townsend's ground squirrels, and jackrabbits or any thing else that moved and things that didn't move including signs, buildings, insulators, etc. I feel with so much disrespect for life and property, there should be a total ban on fire arms in this area, ---PERIOD!
- 5700
- BLM should establish goals to protect the unique and outstanding cultural, geologic, and paleontological resources of the BPA and the SRBOPNCA. The BLM should determine the sites or areas that are most vulnerable to current and future impact and adopt management actions necessary to protect and restore these resources.
- 5730
- BRA lands include very significant paleontological values, particularly in Lakebeds soils. However, significant fossils have also been found in the Little Blue Table area of the Owyhee Tablelands. Paleontological values are threatened by haphazard collection and livestock grazing and trampling and subsequent erosion.
- BLM must inventory and assess paleontological sites, evaluate impacts of activities occurring on these lands (ORVs, grazing, collecting) and identify measures to be taken to protect paleontological sites.
- BLM should identify any inventories needed to provide a basis for understanding the distribution, comparative importance, and potential uses of cultural, geologic and paleontological resources, relative sensitivity, relative opportunities for interpretive development, relative scientific importance, and relative potential for research and education.
- 5800
- Absolute quiet is not a reasonable expectation. Sound from motorized sources such as airplanes exists even in the most remote areas. It is not reasonable to expect absolute quiet in areas intended for multiple-use. The sound level of motorized recreation use is not greater than natural sounds, and therefore, sound level should not be used as a reason to justify motorized recreation and access closures.
- Public land-use agencies could establish reasonable sound limits and use this approach to address the sound level issue. This alternative would be more equitable than closures. We request that this reasonable alternative to motorized closures be pursued and incorporated into the preferred alternative and decision-making.
- 6000

**Comment Code****Comments**

BLM should also incorporate a cost analysis and cost recovery program into the issuance of special use permits. Such uses should be required to post bonds for unintended resource damage and restoration. Special uses should also pay for the costs of the BLM to administer and monitor their uses, including staff time in evaluation and processing of the permit.

Despite our insistence of the importance of this issue, the RMP Team Lead claimed at a recent meeting that the planning effort had failed to budget for the completion of a socio-economic study. We question that statement's validity since the Bruneau pre-plan clearly indicates funding estimates for either use of the State Economist or a contract economist.

We are also aware that the previous economic study done by faculty of the University of Idaho has been questioned by members of the BLM staff involved in the plan development but not by the BLM State Economist.

We request the evaluation of the negative social and economic impact experienced by motorized recreationists when motorized recreational opportunities do not exist in nearby public lands.

6100

Determination of the social and economic effort of land use decisions made under the auspices of the new plans is of critical importance to the County.

6200

the current approach to the identification approximately 50% of the County's employment and economic production and is dominant in establishing the culture of Owyhee County.

6700

Any economic analysis involving this land must clearly identify that changes in livestock numbers in most lands here will not be affecting ma and pa rancher. Instead, they will involve a huge corporate entity that may in reality return a minuscule amount to the local economy.

BLM must detail its annual cost of administration of livestock grazing on affected lands under the current and alternative systems. The percentage of these administrative costs that are covered by BLM's "income" from the \$1.35 grazing fee, and present this to the public in its economic analysis.

BLM must detail its other costs in administration of these lands (recreation, weeds, etc) and present this to the public in its economic analysis. This is necessary to understand how much the administration of livestock grazing dominates the BLM's budget and staff work. Of particular concern is the lesser funding spent on wild lands restoration, recreation, collection of baseline biological data.

**Comment Code****Comments**

We request, and expect that you will recognize and consider all interests who are most closely tied to the locale. Any decision made by the BLM, which affects the amount of and/or timing of AUMs available for livestock, has great repercussions on the economy of the entire local area and the counties involved. This should not be overlooked.

The BLM should develop issues and criteria to ensure that livestock grazing be maintained in a way that promotes the economic vitality and stability of individual ranches and the industry in general.

The plan will focus on developing management plans and activities that ensure that provides for an economically viable grazing industry.

Starting off with the grazing hassle, this would be largely behind us if recommendations of several years ago had been enacted such as setting the grazing fees to contemporary fair market value and reducing the number of AUMs where impacts had become too heavy.

BLM must present an economic analysis of restoration costs per acre, and must include information on the economic "costs" of livestock grazing here. This includes costs of administration.

Removing livestock from both areas will save taxpayers large sums of money --- since administration of grazing permits costs \$6-\$20 per AUM, and BLM currently receives \$1.35 per AUM. This money saved by ending welfare ranching could be used for restoration purposes.