

Submitted electronically: Four_Rivers_RMP@blm.gov; <http://go.usa.gov/xnsn6>



September 23, 2019

Brent Ralston
RMP Planning Team
Four Rivers Field Office
Bureau of Land Management
3948 Development Avenue
Boise, Idaho 83705

RE: BLM Four Rivers Field Office Draft Resource Management Plan and Draft Environmental Impact Statement

Dear Mr. Ralston,

Thank you for the opportunity to provide comments on the Four Rivers Field Office draft Resource Management Plan and draft Environmental Impact Statement. Idaho Wildlife Federation appreciates the time that agency staff put forth throughout the planning process on a plan that will guide management decisions on over 800,000 acres of public land over the next several decades.

I. Idaho Wildlife Federation and Background

Idaho Wildlife Federation (IWF) is Idaho's oldest statewide conservation organization, founded by sportsmen and women in 1936. Today, we represent a nonpartisan voice of 28 affiliate organizations and 45,000 affiliate members and supporters who desire to sustain and enhance Idaho's fish and wildlife, conserve their habitat, and maximize sporting opportunity for current and future generations. Our efforts advance "made in Idaho" solutions to the modern challenges of wildlife management.

The Bureau of Land Management’s Four Rivers Field Office is conducting a comment period for the draft Environmental Impact Statement and Resource Management Plan revision process (Plan). IWF believes there are several areas for improvement in the Plan and management directions that do not represent the needs or wants of Idahoans and the wildlife therein. We would like to address these specific concerns below.

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A. Special Designations

i. Bennett Hills Backcountry Conservation Area

The Bennett Hills are a prized landscape for hunters, both for its’ proximity to the urban centers Boise, Mountain Home, and Twin Falls and for the productive mule deer and upland bird hunting. Idaho Department of Fish & Game (IDFG) offers a highly sought after controlled hunt for mule deer in the Bennett Hills and unit 45. It is well known that this largely unfragmented area produces world-class mule deer between unit 45 and neighboring units, with some deer cresting 200-inches and reaching Boone & Crockett record book qualifications. Upland bird hunters also flock to this area to chase large coveys of chukar, Hungarian partridge, and quail over the generous season dates. These activities circulate millions of dollars every year to the surrounding communities.

The BLM should incorporate the Bennett Hills Backcountry Conservation Area (BCA), totaling 85,930 acres, into the final plan. Currently, the Bennett Hills are managed as a Winter Recreation Area totaling 50,330 acres. A BCA designation would “provide measurable objectives to ensure that the intact and undeveloped character of the land and habitat will be protected from

fragmentation and development, and improved, where possible, to better protect backcountry resources.”

Backcountry Conservation Management: Criteria and Guidance identifies the purpose of BCAs is to;

- Protect, conserve, restore, and enhance larger areas of generally intact and undeveloped BLM-managed lands that contain functional, unfragmented habitats and migration/movement corridors for recreationally-important fish and/or wildlife species, and
- Provide for high-quality wildlife-dependent recreation associated with those species, such as hunting, fishing, trapping, and wildlife watching in the portion of the area under consideration where management of wildlife and recreation can both be enhanced.

IWF supports the BCA management actions spelled out in Appendix S, specifically the direction to “emphasize habitat restoration, with focus on big game and greater sage-grouse habitat needs; and reduce or minimize habitat fragmentation when considering activities,” as well as implementation of seasonal closures to address resource concerns.

A BCA designation is in line with how the agency is already seeing users on the landscape and is more practical than the current Winter SRMA designation. The Plan states, “The activities visitors prefer have changed over the past twenty years in the Bennett Hills areas of the PA from winter season uses such as cross-skiing and snowmobiling to fall season uses for hunting upland birds and big game.”

A BCA designation would also complement the direction from Executive Order 13443, *Facilitation of Hunting Heritage and Wildlife Conservation* to provide for high quality hunting and unique backcountry experiences close to urban centers, which would help increase participation across the board. Finally, BCA framework is set to neither constrain nor prohibit traditional land use practices and allows for fire suppression.

ii. Boise Front Special Recreation Management Area

IWF believes that the expansion of the Boise Front Special Recreation Management Area (SRMA) by 10,190 acres should not come at the expense of our big game herds and runs counter to DOI Secretarial Order 3362. IWF is concerned that with the desire for increased trail building, recreation, and overall human presence on the landscape that this area will see declines in big game habitat quality.

The Boise Front is an area with tremendous importance for big game species and for sportsmen and women, and is just miles away from the steps of Idaho’s capital building. This landscape holds upwards of 10,000 mule deer each winter where many travel as far as the Sawtooth Mountain Range to feed on productive lower elevation hillsides. The Boise Front is also within IDFG’s GMU 39, one of the top five units in the state for mule deer harvest.

Mule deer and elk are not the only users of the Boise Front. The Plan states that an estimated one million recreationists used the Boise Front in 2016. The Ridge to Rivers trail system mileage has doubled over the last 15 years from 90 miles to over 190 miles within the 80,000-acre foothills area. It is well established throughout the Plan that there are increased recreation demands in the Boise Foothills and Boise Front.

Though IWF understands and values the multiple use mandates BLM is required to manage for, multiple uses often may not be compatible with each other on the same landscape and may require spatial differentiation. Numerous studies have shown that outdoor recreation may negatively impact wildlife. One study notes that outdoor recreation activities disturb wildlife, resulting in energetic costs, impacts to animals' behavior and fitness, and avoidance of otherwise suitable habitat. The study, focused on mule deer, antelope, and bison on Antelope Island in Utah, also found that mule deer showed a 96% probability of flushing within 100m of recreationists located off trails; their probability of flushing did not drop to 70% until perpendicular distance reached 390m (Taylor, Knight 2003¹). We cannot assume that with increased recreation demands that all users will stay on trail or if unauthorized trails may be pioneered, which would further contribute to disturbance.

Appendix S states that management of a SRMA requires measurable outcome-focused objectives that 1) sustain or enhance recreation objectives; 2) protect the desired recreation setting characteristics; and 3) constrain uses; including incompatible recreation activities that are detrimental to meeting recreation or other critical resource objectives. IWF is led to believe that the SRMA management boundary expansion in alternative D, in accordance with the clear language of the SRMA management framework, would cast aside the importance of wildlife and their associated habitats to fulfill recreational desires.

The proposed vision for the Boise Front in the Alternative D of the Plan also runs counter to DOI Secretarial Order 3362, *Improving Habitat Quality in Western Big-Game Winter Range and Migration Corridors*. The BLM is directed by language in Section 4 of the order to:

- Evaluate how land under each bureau's management responsibility can contribute to State or other efforts to improve the quality and condition of priority big-game winter and migration corridor habitat (Section 4(b)(2));
- Assess State wildlife agency data regarding wildlife migrations early in the planning process for land use plans and significant project-level actions that bureaus develop (Section 4(b)(4));
- Avoid "development in the most crucial winter range or migration corridors during sensitive seasons (Section 4(b)(5)(iv));
- Minimize "development that would fragment winter range and primary migration corridors (Section 4(b)(5)(v));
- Limit disturbance of big game on winter range (Section 4(b)(5)(vi)); and

¹ Taylor, A.R., Knight, R.L. 2003. Wildlife Responses To Recreation And Associated Visitor Perceptions. *Ecological Applications* The Ecological Society of America. 13(4). pp. 951-963.

- Utilize “other proven actions necessary to conserve and/or restore the vital big-game winter range and migration corridors across the West (Section 4(b)(5)(vii)).

In the Ridge to Rivers Trail System Additions July 2019 Environmental Assessment (EA), BLM acknowledges that all areas of the Boise Front contribute to winter range. The EA states that there is a high potential for disturbance during critical wintering and breeding periods for wildlife due to the proximity of the City of Boise and expanding housing developments along the western boundary of the Boise Front and the rapidly increasing population of the Treasure Valley.

The assessment adds that big game species are less likely to become conditioned to disturbance than other species, and “indirect mortality may occur as a result of being confined to lower quality habitat than what is available to avoid disturbance.” Finally, IDFG surveys indicate that the Boise Front WMA sees “considerably higher winter use by big game than the Boise SRMA/ACEC.” It is likely that in the future we will see trail building increasing in elevation and big game traveling down in elevation, resulting in high disturbance during critical wintering and breeding periods for ungulates. Because of this, IWF requests that any additional and future trail expansions continue at the current elevations and do not expand into higher elevations towards the Boise Front WMA. BLM should coordinate with IDFG to better understand areas of high wildlife priority and areas with possibility for expansion of the WMA.

We appreciate some aspects in the recent trail expansion decision on the Red Hawk and Hawkins Trails that aim to reduce wildlife conflicts, specifically winter closures from December 1 through April 30 and the halting of trail construction from November 16-April 30. These commonsense closures will reduce potential for disturbance during critical wintering and breeding periods for wildlife. If the agency decides seasonal trail closures on BLM managed parcels are warranted and the trail is not wholly on BLM, where sections of that trail run through adjacent non-BLM property (City of Boise, IDFG, State of Idaho), IWF requests that BLM coordinate with those managing partners to seasonally close that trail from point to point. In a mosaic of land ownership in the Foothills, effective seasonal closures must run past management boundaries.

BLM should increase coordination with IDFG, the City of Boise, and other management agencies to develop a mitigation strategy for future recreation expansion. Specifically, each proposal for recreation or trail building should also incorporate big game conservation areas that are of high priority and relatively unfragmented that can be set aside from recreation for wildlife values resulting in no net loss of wildlife habitat. The landscape adjacent to the Boise Front WMA and range lower in elevation should be highly monitored and scrutinized for any future trail expansions. IDFG identifies priority winter range elevation as 4500 feet and lower and BLM should take consideration of these sensitive areas when managing the SRMA.

On August 29, 2019, Secretary Bernhardt signed SO 3376, *Increasing Recreational Opportunities Through the Use of E-bikes*. IWF is troubled by how the SRMA expansion of the Boise Front may lead the use of motorized e-bikes on trails in close proximity or within mule deer habitat. Type 3 e-bikes have the capability to reach 28 mph for extended periods and could fundamentally change the way the foothills are seen and used by wildlife. Because of the

potential for increased interaction during critical time periods, we recommend developing an outreach strategy with management partners in the Foothills to minimize disturbance on wildlife while recreationists using e-bikes are on the trail system. Taylor and Knight (2003) concluded that approximately 50% of recreationists felt that recreation was not having a negative effect on wildlife, and survey respondents perceived that it was acceptable to approach wildlife more closely than empirical data indicated wildlife would allow. Finally, their study noted that recreationists tended to blame other user groups for stress to wildlife rather than holding themselves responsible.

With the Treasure Valley rapidly increasing, we need to ensure there is no net loss of elk and mule deer habitat. IWF has convened and participated in meetings with multiple partners on the future management of the Boise Foothills landscape and will continue to advocate for a balance in recreation and wildlife values.

iii. Hixon Columbian Sharp-Tailed Grouse Area of Critical Environmental Concern

IWF supports the retention and expansion of the Hixon Columbian Sharp-tailed Grouse Habitat Area of Critical Environmental Concern (ACEC) from 4,170 acres to 18,660 acres in Alternative D.

IDFG states that Columbian sharp-tailed grouse (CSTG) occupy less than 5% of their historical range in the U.S., with habitat loss, degradation, and fragmentation being the primary causes for the decline². Similar threats across the remaining occupied range still exist. However, up to 65% of the remaining CSTG populations are found in Idaho. Appendix U also states that the Hixon ACEC contains the largest populations of CSTG and important habitat for mule deer, over 180 bird species, and redband trout.

IWF supports language incorporated in Alternative D stating, “livestock grazing would be managed to reach and maintain habitat conditions for Columbian Sharp-tailed grouse.” IWF believe grazing practices can be compatible with the ACEC and CSTG and recommends that steps are taken after plan finalization to work with ranchers to control timing, intensity, duration, and frequency of grazing to meet the needs of CSTG, as discussed in the CSTG management plan 2015-2025.

IWF believes that the expansion of the Hixon ACEC would encourage habitat improvement projects with a variety of stakeholders, including sportsmen and women. The Land and Water Conservation Fund (LWCF) monies have facilitated acquisition of adjacent non-federal lands to improvement habitat on the ACEC and non-profits have secured conservation easements on adjacent lands. The ACEC expansion fits with the current need and outline for the area.

² Idaho Department of Fish and Game. 2015. Management Plan for the Conservation of Columbian Sharp-tailed Grouse in Idaho 2015-2025. Idaho Department of Fish and Game, Boise, USA.

IWF has been involved in habitat improvement projects with IDFG in this area and continues to monitor this area for additional opportunities for partnerships to benefit CSTG populations. With multiple petitions to list CSTG over the last two decades, it is critical we take proactive measures to prevent a warranted listing while still allowing traditional and compatible uses.

iv. Long-billed Curlew Habitat Area of Critical Environmental Concern

IWF supports the retention of the Long-billed Curlew Habitat ACEC in its current acreage. The preferred alternative aims to reduce the ACEC from 45,020 acres to 26,810 acres, or by 18,210 acres.

Noted in Appendix U, “the ACEC provides habitat for what was once one of the densest nesting populations of long-billed curlew in Idaho. Declines in population have resulted in fewer birds in recent years.” Additionally, “Ground-disturbing activities can reduce the amount of availability of suitable breeding and nesting habitat.”

The rationale to reduce the acreage of the current ACEC into the preferred alternative is flawed. The preferred alternative seeks to strip away thousands of acres of special designation for curlew, yet there is admittance in the Plan that there are no obvious factors contributing to declining populations. BLM may be in violation of Section 202(c)(3) of the Federal Land Protection and Management Act (FLPMA) which requires that priority be given to the designation and protection of ACECs in land use plan revisions (43 U.S.C., S 1712 [c][1]). Appendix N states that IDFG has documented a declining population and nesting success in the Curlew ACEC from an estimated 1,000 pairs in the early 1980s to 160-300 individuals in 2012. Because of the decline in curlew, BLM needs to take more proactive measures on the landscape to conserve habitat for these birds instead of sweeping reductions by thousands of acres. The management prescriptions in the preferred alternative strike a good balance of considerations for curlew while allowing other traditional uses. IWF recommends that the final plan incorporates these preferred alternative prescriptions but retains the current ACEC acreage boundary.

v. Oxbow-Brownlee Special Recreation Management Area

IWF supports the acreage retention of Oxbow-Brownlee Special Recreation Management Area (SRMA), as outlined in Alternative A. The preferred alternative would recommend this area be managed as an Extensive Recreation Management Area (ERMA) with 36,820 acres under the designation.

IDFG’s Management Units 22 and 31 encompass the Oxbow-Brownlee management area and the landscape to the East towards the towns of Weiser, Midvale, and Cambridge. This larger area and the two management units are heavily used by big game hunters, with a combined 39,975 hunter days for deer and elk for all weapons combined in 2018. There can be exceptional quality of animals harvested in this area, with over 30% of bull elk harvested in both units being 6 points or greater. Quality upland bird hunting experiences are also available within the Oxbow-Brownlee area.

The current SRMA direction is to provide diverse recreational opportunities, primarily associated with Oxbow, Brownlee, and Hells Canyon Reservoirs. We encourage the BLM to consider retaining the current acreage of 56,430 acres instead of a reduction to 36,820 acres maintain and enhance the experience of hunters and fishermen.

B. Other Comments and Recommendations

i. Big Game Migration Corridors and Associated Winter Range

Migration is a critical life-history characteristic of ungulates that is at risk of disruption because of habitat loss and fragmentation. In some situations, the advantages acquired by migration could be outweighed by the risk, additional time, and energetic costs associated with avoidance of increased human development (Lendrum et al 2013³).

BLM should develop oil and gas lease stipulations for identified big game migration corridors and winter range. Lendrum et al (2013) noted that “Mule deer... appear to avoid negative effects from development activity through behavioral shifts in timing and rate of migration. Continued monitoring of mule deer and energy-development interactions are necessary to identify potential development strategies that minimize behavioral shifts in traditional migratory patterns.” This is only one study of many in recent years analyzing negative impacts during vulnerable time periods for big game species, and IWF believes practical stipulations on oil and gas development should be incorporated into the final Plan.

Stemming from SO 3362, IDFG mapped priority areas across the state where high wildlife conflict with vehicles or traffic occurs, as well as key migratory pathways and stopover areas. BLM can incorporate management strategies that, in coordination with IDFG, can safeguard migratory corridors from increased development.

ii. Domestic/Wild Sheep Interaction

Noted in Appendix N, “IDFG considers disease risk reduction (specifically transmission from domestic sheep and goat to bighorn sheep) and population growth as the most important issues driving bighorn sheep management (IDFG 2010)”.

Additionally, in Appendix N, it is BLM policy to complete separation response plans and to include immediate communication with IDFG when wild and domestic sheep come into contact. BLM admits that once communication has started on the situation or risk, generally bighorn sheep have already come into contact with domestic sheep. It is especially troubling that BLM still seeks to implement this strategy in the Plan. In Chapter 2 (Alternatives Table), MA-FW-09 lists in the preferred alternative, “Use separation response plans and other best management practices to minimize risk of contact between domestic goats and bighorn sheep. Address commercial and non-commercial use of goats in existing and potential bighorn sheep habitat

³ Lendrum, P.E., Anderson, Jr, C.R., Monteith, K.L., Jenks, J.A., Bowyer, R.T. 2013. Migrating Mule Deer: Effects of Anthropogenically Altered Landscapes. PLoS One. 8(5): e64548.

with implementation level plans.” The preferred alternative does not go far enough to conserve what is left of the isolated bighorn sheep in the state.

BLM should work with IDFG to identify and incorporate greater spatial and/or temporal separation between bighorn sheep and domestic sheep and goats. IDFG comments from August 2019 on the Plan can also help guide the agency into better management strategies that will conserve our wild sheep herds.

iii. Vegetation Resources and Noxious Weed Management

Appendix J states that exotic annual grasses are usually the primary fuel type for rapid fire spread and early season burning. With climate change posing a unique threat to the western United States and the increase in invasive annual grasses outcompeting native perennial species throughout the Plan area, we appreciate the proposed vegetation resources management actions, specifically to prioritize new noxious weed infestations and invasive plan dispersal corridors for weed treatment.

IWF encourages that the final Plan incorporates language from Alternative B in MA-VA-04, limit the spread of exotic annual grasses by reducing impacts to native perennial species. We hope that BLM continues to work across management borders with private landowners, state agencies, and other federal partners to effectively treat large land tracts through mechanical, biological, or chemical controls while maintaining the BLM Standards for Rangeland Health. It is essential that we work together to reduce or mitigate spread of exotic grasses for the health of sage grouse and hundreds of other species that rely on the sagebrush ecosystem.

iv. Best Management Practice for Wildlife-Friendly Fencing

Where feasible, BLM should consider incorporating wildlife-friendly fencing requirements on any new fencing on BLM managed parcels within the plan area.

SO 3362 encourages BLM to work cooperatively with private landowners and State highway departments to achieve permissive fencing measures, including removing, modifying, or seasonally adapting fencing to aid in movement of big game species.

IWF recommends BLM to reference *A Landowners Guide to Wildlife Friendly Fences* (Paige, C. 2012⁴) to aid in future fencing construction. The guide recommends:

- A top wire or rail no more than 40” and a maximum of 42” above the ground;
- At least 12” between the top two wires
- A bottom wire or rail at least 16” and preferably 18” above the ground; and
- Smooth wire or rail for the top, smooth wire on bottom.

⁴ Paige C. 2012. *A Landowner’s Guide to Wildlife Friendly Fences: How to Build Fence with Wildlife in Mind*, Second Edition. Private Land Technical Assistance Program, Montana Fish, Wildlife & Parks, Helena, Montana, USA.

We understand this may not be feasible in all situations, but where possible, we ask BLM incorporate this language into the Plan.

v. Land Tenure

We appreciate BLM explicitly identifying lands that will be retained, unless lands can be exchanged containing equal or greater resource values, resulting in larger more contiguous blocks present. As noted in Appendix I, there are 96 remaining tracts identified for disposal by the BLM Director in 1988 (as amended in 2013). BLM should not grandfather these tracts of land into disposal consideration simply because they have been identified in the past. It is likely that the previous identification has not fully evaluated current land values on adjacent state and private lands and mechanisms currently in place on adjacent lands such as conservation easements.

The BLM should consider additional analysis with the new set of criteria as identified in Secretarial Order 3373, *Evaluating Public Access in Bureau of Land Management Public Land Disposals and Exchanges*. The purpose of SO 3373 is to ensure that “recreational public access is an important value now and into the future as the Bureau of Land Management makes decisions involving the disposal or exchange of lands.” Additionally, the order aims to ensure that “early assessment of proposed BLM disposals, access for hunting, fishing, and other outdoor recreation will be an important consideration...”

While Section 203 of FLPMA identifies one criteria for disposal out of Federal ownership as “such tract was acquired for a specific purpose and that tract is no longer required for that or any other Federal purpose;” IWF believes BLM should also fully explore all purposes and benefits to that parcel not just including the specific purpose for acquisition, including sportsman’s access, fish and wildlife habitat, and any other future benefits for public ownership that may arise.

IWF requests that BLM only assess lands available for disposal if there is no existing public access or potential for public access through easements or agreements, and where the benefits of the disposal heavily outweigh the loss of access for sportsmen and women. SO 3373 also directs the BLM that if public access would be lost through disposal or exchange, to consider an associated acquisition with a recreational component. We recommend to explicitly define these parameters laid out from SO 3373 in the Plan.

C. Conclusion

Thank you for the opportunity to provide comments and for your service for all Americans. As hunters, we have an obligation to look after the health of our herds, our bird populations, and land that these species rely upon. IWF will continue to be the voice for Idaho sportsmen and women throughout the completion of the Plan. We look forward to working with the agency in the future.

Sincerely,

A handwritten signature in black ink, appearing to read "Garret Visser". The signature is fluid and cursive, with the first name being more prominent.

Garret Visser

Conservation Program Coordinator

Idaho Wildlife Federation

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