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BLM National NEPA Register

Comment Submission

Project: DOI-BLM-ID-B011-2017-0001-EA - Morley Nelson Snake River Birds of Prey National Conservation Area (NCA) South Travel Management Plan (TMP)

Document:

Submission ID: NCATMP2023-1-500624103

Comment

01/05/2024 Submitted Via Online Portal

Comments on the Morley Nelson Snake River Birds of Prey National Conservation Area (NCA) South Travel Management Plan (TMP) Environmental Assessment (EA)

My name is Daniel Salemi and I am the President of the Golden Eagle Audubon Society.

The Golden Eagle Audubon Society (GEAS) is a 501(c)(3) non-profit organization founded in 1972 and based in Boise, Idaho with 1,500 members. GEAS' mission is to build an understanding, appreciation, and respect for the natural world to conserve and restore natural ecosystems for birds and other wildlife. GEAS' area of interest includes Ada, Elmore, Canyon, Owyhee, Washington, Payette, Gem, and Boise counties.

We commend the BLM for identifying alternatives to reduce the impacts of motorized recreation and promote conservation and health of natural resources consistent with its mission, authorities, and responsibility. In line with the GEAS mission and interests of our members, we ask the BLM to ensure America's public lands are managed in a way that benefits current and future generations of people as well as our nation's wildlife.

The Morley Nelson Snake River Birds of Prey NCA South TMP is of particular interest to GEAS as the NCA is home to the greatest concentration of nesting birds of prey in North America. In addition, a number of other birds dependent on sagebrush habitat are experiencing population declines. These species are declining primarily due to habitat loss, including the proliferation of invasive species such as cheat grass. The quality of nesting habitat and adequate prey availability are important factors in nesting success. Adequacy of cover is critical for nesting birds and reproduction of prey species. Motorized vehicles close to nesting areas are of great concern.

Golden Eagles, Ferruginous Hawks, and many other species are impacted by human disturbance, loss of habitat, and habitat fragmentation in the Morley Nelson Snake River Birds of Prey NCA South TMA. Both of these birds of prey species are very sensitive to human disturbance, especially during nesting season. GEAS is also concerned about the other Special Status Bird Species occurring within TMA Analysis Area and listed in Table B-23. Populations of all birds listed in Table B-23 are declining and need adequate conservation measures to be put into place now to increase nesting success sufficient to begin to reverse the trend.

GEAS agrees with BLM that the No Action Alternative will further contribute to the loss of important habitat for birds and other wildlife. The absence of any seasonal closures in place for Golden Eagles and other birds of prey is especially concerning. Continued use of routes near nesting birds of prey will certainly continue to negatively impact breeding success.

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Although all of the alternatives analyzed in the EA will reduce impacts to birds over the No Action Alternative, GEAS urges the BLM to select Alternative B. Alternative B is the most protective of the species the NCA was established to benefit. The permanent route closures especially will benefit Golden Eagles and Ferruginous Hawks by reducing human disturbance and will decrease habitat fragmentation for prey species and other wildlife. Alternative B also maximizes the area available for rehabilitation of habitat upon which other sensitive bird species depend.

We appreciate the opportunity to submit these comments.

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Submitter(s)

Submitter 1

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Position: President

(Add me to the project mailing list) - YES

Disclaimer

Before including your address, phone number, e-mail address, or other personal identifying information in your comment, you should be aware that your entire comment - including your personal identifying information - may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

(Withhold my personally identifying information from future publications on this project) - **NO**

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