

PUBLIC COMMENTS AND RESPONSES

Letters of comment received as a result of the public review of the Draft EA are included in this appendix. All of the letters received are listed below. Copies of these letters follow, along with the responses.

Comment Letter	Page
1—Billy Thompson, Minidoka Irrigation District, Burley, Idaho	C-2
2—Steve Bouffard, U.S. Fish and Wildlife Service, Rupert, Idaho	C-3
3—David Parrish, Idaho Department of Fish and Game, Jerome, Idaho	C-5
4—Susan Pengilly Neitzel, State Historic Preservation Office, Boise, Idaho	C-7



United States Department of the Interior

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10 May 2004

Carolyn Coiner
 PN-3902
 Bureau of Reclamation
 1150 N. Curtis Road, Suite 100
 Boise, ID 83706-1234

Dear Ms Coiner,

This letter is in regards to the Draft EA on the Minidoka North Side Resource Management Plan. My response is focused on matters affecting Minidoka National Wildlife Refuge and on minor corrections to the "Affected Environment" chapter. It will not address other matters relating to the U. S. Fish and Wildlife Service, such as compliance with laws and regulations, things which are not under the direct purview of this Office.

- 2-1 | Minidoka NWR supports the preferred alternative, alternative B.
 There are some corrections that should be made in the affected environment.
- 2-2 | Page 3-25 Minidoka NWR has a newer version of its Bird List (copy enclosed) that better describes the local avifauna.
- 2-3 | Page 3-26 Add Western Chorus Frog (*Pseudacris triseriata*); correct spelling of *Ambystoma*
- Page 3-27 Table 3.5-1
Columbia Sharp-tailed Grouse. There has been a lek on the Refuge just east of the RMP study area since 1998.
Black Tern. Has not nested on the refuge for a couple decades. Is not common on the refuge except for a brief period in September during fall migration.
- 2-4 | Amphibians. I have never seen a Western Toad in Southern Idaho. I suspect that they have been extirpated. Northern Leopard Frogs are fairly common around Lake Walcott. I suggest you contact Dr. Charles Peterson of Idaho State University for better status of reptiles and amphibians in the RMP study area.
Reptiles. I have seen small numbers of Short Horned Lizards on Minidoka NWR, both north and south of the river.

2—Steve Bouffard, U.S. Fish and Wildlife Service, Rupert, Idaho

- 2-1 Comment noted.
- 2-2 The Wildlife Affected Environment text, Section 3.5.1, has been updated to better reflect the abundance of birds at the Minidoka NWR.
- 2-3 The Western chorus frog was added to the Wildlife Affected Environment text, Section 3.5.1., and *Ambystoma* spelling was corrected.
- 2-4 The species listed in this comment were updated appropriately in Table 3.5-1.

2-5

Page 3.39 Utah Valvata Snail. I do not know if it occurs below Minidoka Dam in the RMP study area. However, it is probably incorrect to assume that it does not occur because “it requires cool, free-flowing water”. The snail occurs throughout Lake Walcott, which certainly cannot be characterized as “cool, free-flowing water”. BOR and the Boise Ecological Services Office of the FWS may have more recent surveys.

2-6

Page 3-45 Table 3.8-1

925-4-W This parcel is almost entirely within the refuge; no camping is allowed on the refuge. A portion of the parcel extends to Bishop’s Hole around the area where the big tree once stood. There may be some ad hoc camping occurring in this area. Because of the potential for litter and other problems I would suggest that the area outside the refuge be designated day use only.

825-16-A This parcel is entirely within the refuge; no camping is allowed on the refuge.

925-5-A This parcel abuts the Refuge boundary and is part of the Bishop’s Hole access road. There is probably not much, if any camping on this parcel. Because of the potential for litter and other problems I would suggest that this area be designated day use only.

925-1-W This parcel includes Lake Walcott State Park. Of the 4 tracts listed here, and in table 3.8-1 where camping occurs, this is the only parcel with organized and designated camping areas.

Thank You for the opportunity to comment on this draft.

Sincerely,



Stephen H. Bouffard
Manager, Minidoka National Wildlife Refuge.

2-5 The text in Section 3.7.1.2, *Fish and Other Aquatic Species*, has been updated to reflect the comment.

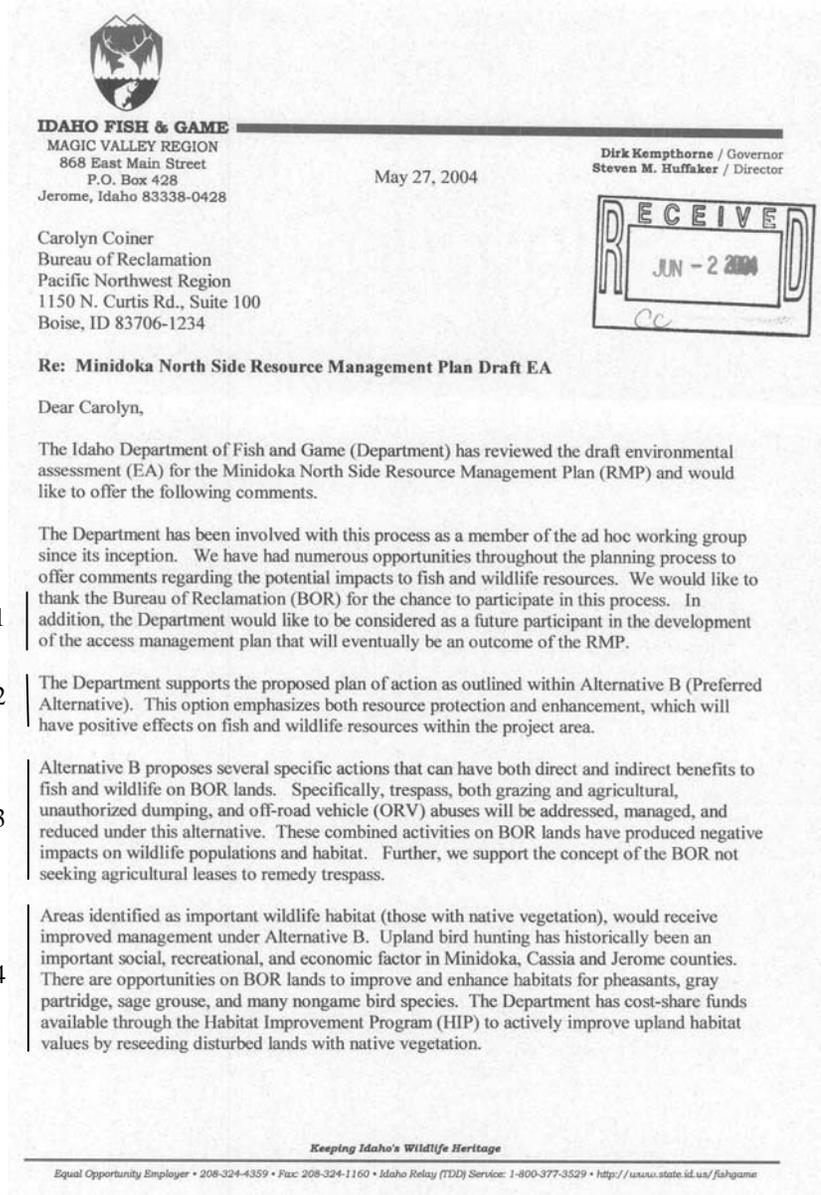
2-6 Table 3.8-1 describes the affected environment (existing conditions) on each of the parcels. It does not designate what areas would be opened or closed in the future; that is part of the alternatives.

925-4-W: A footnote has been added to the table to explain that camping is not allowed on the Minidoka NWR portion of the parcel, but that ad hoc camping does occur in the area of Bishop's Hole. Alternative B, the Preferred Alternative, states that no camping would be allowed at Bishop's Hole. This is explained in the Environmental Consequences section in Recreation (Section 3.8.2.2).

825-16-A: The camping mark has been removed from this parcel on the table since camping is currently not allowed there.

925-5-A: Reclamation has observed camping at this area, so it will remain as such in this table. However, this parcel would be included in the camping closure (day use only designation) at Bishop's Hole, parcel 925-4-W.

925-1-W: A footnote has been added to the table to indicate that this is the only designated camping area, and all others are informal camping uses.



3—David Parrish, Idaho Department of Fish and Game, Jerome, Idaho

- 3-1 As a management partner for wildlife tracts, IDFG will be included as a partner in the development of the Access Management Plan. Reclamation will include all appropriate agencies and the irrigation districts in development of this plan.
- 3-2 Comment noted.
- 3-3 Comment noted.
- 3-4 Alternative B, the Preferred Alternative, states that Reclamation will, "undertake proactive management to improve/rehabilitate habitat." Part of this includes re-seeding and working with other agencies to leverage existing dollars.

3-5 The Department suggests that any new grazing leases be thoroughly analyzed under any adopted alternatives for potential impacts to wildlife. The understory component in sagebrush ecosystems is extremely important to wildlife, and grazing for fuels reduction may not be a practice compatible with wildlife resources.

The Department and the BOR have historically cooperated in wildlife habitat management on numerous tracts in the North Side project area. A number of tracts and the accompanying management agreements need to be reviewed and reassessed for priority management. According to the EA, the Fish and Wildlife Service studied 73 of 113 withdrawn parcels for wildlife and wildlife habitats.

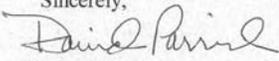
3-6 Over the years it is probable that many activities have changed the face of the landscape and some tracts no longer provide habitat or are beneficial to wildlife. Small, isolated tracts may now be totally surrounded by agricultural development or have disappeared entirely. Trespass, dumping, fires, weed invasions, and ORV abuses may have severely depleted whatever resource values were present in 1989.

As the RMP draft EA points out, "*The highest wildlife habitat values are generally associated with the largest parcels supporting native vegetation.*" (p. 3-24). Consideration should be given to placing a higher priority on these parcels for wildlife habitat improvement and enhancement. Alternative B supports this plan of action. In addition, existing wildlife parcels and those contracts between the Department and the BOR would have to be restudied to determine the most effective course of future management.

3-7 The Department supports Alternative B for its continuance of drain water wetlands and proposals to implement actions that will improve and/or enhance wetlands habitat values. Under the HIP, funds are also available for waterfowl habitat development projects.

3-8 Access to the Snake River system for fishing and boating has become more and more difficult for the general public over the years. The Department encourages the BOR to maintain those tracts of land that allow public access to the Snake River.

Thank you for the opportunity to comment on the draft EA for the proposed Minidoka North Side RMP. If you have any questions or comments, please contact Mike Todd, Wildlife Habitat Biologist, at this office.

Sincerely,

David Parrish
Magic Valley Regional Supervisor

Cc: IDFG/NRPB
ECc: IDFG (R4 staff)

3-5 Comment noted.

3-6 Alternative B, the Preferred Alternative, states that Reclamation will, "cancel contracts and renegotiate a possible new contract or agreement with IDFG." This negotiation will entail looking at all appropriate parcels, not just those under existing contracts. Like IDFG, Reclamation is interested in pursuing the most effective management course for habitat improvement.

3-7 Comment noted.

3-8 Public access is not a consideration in parcel retention/relinquishment and/or disposal decisions. These decisions are based on project need to meet project purposes.



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Governor of Idaho

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Executive Director

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Ms. Carolyn Coiner
PN-3902
Bureau of Reclamation
1150 North Curtis Road, Ste. 100
Boise, Idaho 83706-1234

RE: Draft Environmental Assessment for the Minidoka North Side Resource Management Plan, Minidoka Project, Idaho

Dear Ms. Coiner:

Thank you for requesting our views on the draft Environmental Assessment for the Minidoka North Side Resource Management Plan. We support Alternative B as the preferred alternative and applaud the Bureau of Reclamation's plans to conduct Section 110 surveys within the planning area. Following are a few suggestions for revision:

Page 1-8, Cultural Resources: A bullet should be added to the beginning of this section stating that Reclamation will meet its responsibilities under Sections 106 and 110 of the National Historic Preservation Act of 1966, as amended. The National Historic Preservation Act sets broad preservation policy for Federal agencies and should lead any discussion on identifying, evaluating, and protecting cultural resources.

Page 2-2, Similarities Among Alternatives: The sixth bullet in this section should state that Reclamation will follow Section 106 and 110 of the National Historic Preservation Act, including the process set forth in 36CFR800.

Page 2-9, Table 2.1-1, Recreation and Access: We are pleased that Reclamation plans to work with Idaho Department of Parks and Recreation to develop a Historic Preservation Plan for Lake Walcott State Park. Reclamation should also work with U.S. Fish and Wildlife Service (FWS) to develop such a plan for the FWS Wildlife Refuge lands that are owned by Reclamation, as identified on the map labeled Figure 2.2-1.

Page 2.4-1, Cultural Resources Alternative B: We support Reclamation's commitment to carefully review proposed agricultural leases and recreation uses for effects on cultural resources. It has been our experience that agriculture, recreation, and cultural resources can be managed cooperatively with good planning.



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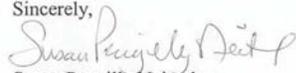
4—Susan Pengilly Neitzel, State Historic Preservation Office, Boise, Idaho

- 4-1 Comment noted.
- 4-2 This bullet statement has been added as requested.
- 4-3 The text was changed as requested.
- 4-4 The Historic Preservation and Maintenance Plan has been expanded to include consultation with the FWS and the refuge lands as requested. The language in the EA was amended accordingly.
- 4-5 Comment noted.

Carolyn Coiner
April 27, 2004
page 2

- 4-6 | **Page 3-51, Section 3.8.2.2, paragraph 4:** The end of the second sentence should refer to protecting and preserving “cultural resources” rather than “natural resources.”
- 4-7 | **Page 3-73, Cultural Resources:** This section is well written, thorough, and accurate.
- 4-8 | **Page 3-77, Section 3.13.2.2, Alternative B:** This section should restate that Section 106 and 36CFR800 will be followed for undertakings within the study area.
- 4-9 | **Page 5-4, Section 5.1.7 Cultural Resource Site Protection:** Item number one under this section explains that “If necessary, Reclamation will prepare a Cultural Resources Management Plan (CRMP) to define long-term management and protection goals and processes.” What does “If necessary” mean? It should be explained in this paragraph, at least briefly, under what conditions or circumstances Reclamation would consider the development of a CRMP necessary.

We appreciate your cooperation and look forward to working with Reclamation through this planning process. If you have any questions, please feel free to contact me at 208-334-3847.

Sincerely,

Susan Pengilly Neitzel
Deputy SHPO and
Compliance Coordinator

cc: Dr. Ray Leicht, Reclamation, Boise

- 4-6 The text was changed as requested.
- 4-7 Comment noted.
- 4-8 The text was changed as requested.
- 4-9 The conditions under which Reclamation would consider developing a CRMP are now described in the EA. Such conditions include considering the nature of impacts happening to a particular cultural site or sites, the magnitude of such impacts, and the National Register quality of the site or sites being impacted.