



**BACKCOUNTRY
HUNTERS & ANGLERS**
IDAHO

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RE: South Fork Willow Creek and Rocky Canyon Parcel acquisitions (DOI-BLM-ID-B010-2023-0024-EA)

Backcountry Hunters & Anglers (BHA) is the voice for our wild public lands, waters and wildlife. We seek to ensure North America's outdoor heritage of hunting and fishing in a natural setting through education and work on behalf of fish, wildlife and wild places. With chapters in 48 states, Washington D.C., two Canadian provinces and one Canadian territory, as well as nearly 2,000 dues paying members in Idaho, BHA attracts sportsmen and women, as well as other public land users, from across the continent.

Thank you for the opportunity to comment on the proposed acquisition of the 320 acre South Fork Willow Creek and the 30-acre Ricky Canyon parcels in the Boise Foothills. We strongly support the acquisition of both these parcels utilizing Land and Water Conservation Funds (LWCF). The rapid growth rate of the Treasure Valley continues to expand residential development into critical big game winter range in the Boise Foothills. Other incremental impacts associated with this growth, including fire, invasive species, increased recreational uses and wildlife- vehicle collisions, are contributing to a long-term decline in mule deer populations. According to spatial data collected by the Idaho department of Fish and Game (IDFG), the Boise River mule deer herd migrates an average of 45 miles to their winter range in the Boise Foothills, with some deer travelling almost 100 miles. The deer and elk that utilize this winter range would benefit from the reduced threat of development that would result from this transaction.

Secretarial order 3362 directs the BLM to work with state agencies to enhance and improve the quality of big game winter range. Both parcels lie within the Smokey-Boise complex identified by IDFG as one of five priority areas in the state for implementing the order. The threats identified for this area in the Idaho State Action Plan include:

- Winter range degradation due to wildfire and invasive weeds.
- Urban, residential, infrastructure, and energy development, and land-use changes within winter range and migration habitat.
- Fencing designs that disrupt big game movements.
- Wildlife-vehicle conflicts within winter range and migration habitat.

As you analyze resource objectives and potential alternatives for the acquisition of these properties, we ask that you prioritize wildlife security and habitat conservation over increased recreation infrastructure. As the Treasure Valley and adjacent areas continue to grow,



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conservation of winter range with minimal disturbance to wildlife becomes increasingly important. Thank you again for the opportunity to comment, and we encourage you to move forward with the proposed acquisitions utilizing LWCF Funds.

Sincerely,

The Idaho Chapter of Backcountry Hunters & Anglers



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