



June 6, 2016

Bureau of Land Management
Gateway West Project
1387 S. Vinnell Way
Boise, ID 83709

Dear Sirs:

The Raptor Research Foundation (RRF) is the world's largest professional society for raptor researchers and conservationists. Founded in 1966 as a non-profit professional organization, our primary goal is the accumulation and dissemination of scientific information about raptors. We also promote an awareness and appreciation of raptors among the general public. Our 950+ membership spans 50 countries on six continents, forming a global network of raptor experts. The RRF achieves its mission in part by providing expert scientific advice on international raptor conservation issues to governments, wildlife agencies, zoos, and non-profit organizations.

RRF's longstanding interest in conservation activities in the Morley Nelson Snake River Birds of Prey National Conservation Area (NCA) has spanned more than 30 years; including testifying at the hearings for establishing the NCA, serving on various technical review panels, and providing technical advice to the U.S. Bureau of Land Management (BLM) which manages the NCA. Morley Nelson was a long-time member of RRF. He dedicated his life to working with the electric industry to protect raptors and demonstrating that power transmission/distribution and raptor protection could be compatible.

We are aware that the alternatives being evaluated in the Draft Supplemental EIS for Segments 8 and 9 the Gateway West transmission project include routes within the Morley Nelson Snake River Birds of Prey National Conservation Area. We would like to make BLM aware of certain relevant facts about raptors and transmission lines.

1. Research data show that properly designed transmission lines can be compatible with nesting raptors (Steenhof et al. 1993, attached).

2. Transmission lines can enhance raptor populations, when properly routed and when nesting structures are placed appropriately.
3. Electrocution mortality is not an issue for raptors on transmission lines due to wire spacing.
4. Collision with transmission lines does not appear to be an issue for birds of prey, possibly because raptors can see and avoid the larger and/or bundled wires used in transmission lines. Recent studies indicate that migrating raptors alter flight elevation to pass safely above or below wires (Luzenski et al. 2016, attached).
5. Transmission lines that can be constructed and maintained from existing roads are less likely to impact vegetation and the prey populations that support raptors.
6. Raptors and ravens that nest or roost on transmission towers are likely to forage several kilometers from the power line (Engel and Young 1992, attached). This could present a risk for prey species whose status is a concern (e.g., sage grouse).

We are aware that the 1993 legislation that established the NCA defined its purpose to be for the “conservation, protection and enhancement of raptor populations and habitat” while allowing “for diverse appropriate uses of lands in the area to the extent consistent with the maintenance and enhancement of raptor populations and habitats.” It appears that proposed transmission line routes through the NCA are compatible with goals of the legislation. We also are aware that the NCA is in degraded condition due to wildfires and invasive species, and we are optimistic that mitigation and enhancement proposed by the power companies could help to restore the condition of the NCA, while enhancing raptor nesting habitat. We feel this is an opportunity that the BLM should consider strongly.

The research that supported and justified establishment of what is now the Morley Nelson Snake River Birds of Prey NCA continues to be recognized internationally as significant, and designation of the area serves as an outstanding example of a science-based decision by BLM. The NCA is one of few protected areas whose boundaries were based on scientific information on the requirements of species it was designed to conserve. We were pleased to learn that “science plays an important role in how the National Landscape Conservation System (NLCS) lands are managed” by BLM, and we are hopeful that the NLCS will continue to use site-specific scientific data in administering the Morley Nelson NCA and other lands under the NLCS purview.

Yours sincerely,



Miguel D. Saggese
President, Raptor Research Foundation