

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

MANAGEMENT FRAMEWORK PLAN
RECOMMENDATION-ANALYSIS-DECISION

BOOK 1 4 1993
Name (MFP)
Kuna
Activity
Lands
Overlay Reference
Step 4 L-3 Step 3 D-1

L-1.1: Multiple Use Recommendation

Classify or designate public lands for agricultural development. Specific management recommendations are as follows:

- (1) Classify all available public lands (those not withdrawn, classified for another use or otherwise appropriated) that have Class I, II or III soils (per system used for Agricultural EIS) as suitable for agricultural development. The classification should not preclude or segregate from disposal under any other applicable public land laws and as outlined:
 - a. All lands not presently having DLE or Carey Act applications will be closed to applications under these laws.
 - b. No land disposal will take place within the boundary of PLO 5777 until such is legally changed or dropped except:
 - 1) If exchanges will enhance the intent for which 5777 was withdrawn (see W/L-5.2).
 - 2) Disposal may be considered under the R&PP Act or FLPMA for community expansion.
- (2) Disposal should be made in an orderly manner, such as in blocks. We should coordinate with county officials, state agencies, utility suppliers and existing users to determine a proper disposal sequence in order to allow for optimum orderly development with minimum disturbance to existing users. Upon completion and identification of a new block an EIS or EA will be written. The classification system will include the same criteria as used in the Decision Document for Ag EIS areas.

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- (3) Disposal of these lands through sale or exchange under provisions of the Federal Land Policy and Management Act should be made whenever possible. Where these actions are not feasible, continue to process Desert Land and Carey Act applications.
- (4) Coordinate all lands disposal actions with County Commissioners and Highway Department officials to insure that adequate public land is reserved for road construction to provide access to new developments and to other public land which might otherwise become isolated or inaccessible due to the new developments. Coordinate these road needs on agricultural developments at time of classification and prior to allowance.
- (5) Coordinate Ag disposal with Idaho Department of Water Resources for water availability.

Analysis:

- (1) Agricultural development is considered the highest and best use of public land suitable for this purpose if irrigation water can be delivered to these areas on an economical basis. Developing farms on the better soils first will result in the most efficient use of available water. Those agricultural developments that are the least environmentally disruptive, that constitute the higher economic return, and comprise the greatest public benefits should be given allowance priority.
- (2) Development of blocks should relieve local governments from unnecessary burdens in furnishing roads and other services, and will also allow utilities to plan and develop the needed services in an orderly manner.
- (3) Disposal through exchange or public sale is less cumbersome administratively and more economical for the Bureau to process than disposal under the agricultural land laws. High public benefits are often derived, and these lands can also be offered through exchange to acquire private lands having

Note: Attach additional sheets, if needed

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high public values (i.e., Boise Front, Oregon Trail, Birds of Prey Area). Some parcels having high amounts of Class II and III may not prove economically justifiable at 160 or 320 acre units. Then leasing or selling larger blocks (500, 1000, 1500 acres or more) may be profitable because of production in volume.

- (4) Past disposal actions have often resulted in obliteration of access roads a have prevented public use of public lands in many cases. County officials should be consulted to coordinate the proper route to serve local needs and to insure that proper widths are reserved to permit road construction which would meet county standards.

The existing case backlog is enough to keep busy for probably ten years or more.

Depending on how many of the existing applications are allowable, all water in t state may be appropriated before we finish processing the existing cases.

Decision:

This recommendation has been incorporated into Decision L-8.1 and L-8.3 as follows:

L-1.1 Item (1) - refer to L-8.3D(1).

L-1.1 Item (1) - refer to L-8.1D.

L-1.1 Item (1) b. 1) - refer to L-8.1G.

L-1.1 Item (1) b. 2) - refer to L-8.1A.

L-1.1 Item (2) - refer to L-8.3D(2).

L-1.1 Item (3) - refer to L-8.3D(3).

L-1.1 Item (4) and (5) have been deleted as these actions are sufficiently covered by L-8.3D(2).

Additions to these recommendations have been added as L-8.1D (2) (3) & (4) for clarification purposes.

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#2

Objective #2:

Provide for military use of public lands in support of national defense efforts.

Rationale:

The Idaho National Guard has been using public land in the Kuna Planning unit for military maneuvers for nearly 30 years. The ING schedules use of the area by other military units from all over the country. Other maneuver areas, particularly in the east, are becoming more restrictive in use because of population encroachment. The use of this area is increasing annually and will do so at an accelerating rate.

Benefits:

- Positive** - National defense effort is aided.
- Economic boost to local community is provided by non-resident units that come here to train.
- Energy is conserved because of the proximity of the area to the base facility.
- Negative** - Land remains unavailable for disposal (DLE, Carey Act, etc.).
- Impact area is hazardous to public and will get worse as Boise continues to grow.

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L-2.1: Multiple Use Recommendation

- (1) Designate the existing 130,000 acre Idaho National Guard maneuver area in this planning unit for a military use area and allow no incompatible uses.
- (2) Reject all applications for disposal within the National Guard MOU area.
- (3) Further withdraw the Impact Area from Mining Law of 1872 and the mining and mineral leasing laws (see M-1.1, 2.1 and 3.1).

Analysis:

Continued use of this area is essential to the Idaho National Guard's mission. This lends support to the national defense effort. This area has been used since 1953. In 1980 the area was used by 7 different state national guard units and active army units 210 consecutive days and a total of 348 days. The Idaho Guard Annual Payroll is \$8 million alone.

Decision:

- (1) Continue to allow the use of the area outlined in the 1979 MOU for military activities, however, they must be in concert with W/L-5.2.
- (2) Accept as written.
- (3) Withdraw the Impact Area from activities under the 1872 Mining Law. Do not withdraw the area from mineral leasing laws. However, there will be a no occupancy stipulation on any mineral leases issued within the Impact Area (see M-1.1).

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Reason:

The area has been withdrawn from DLE, Carey Act & state selection by PLO #5777 f Snake River Birds of Prey Area. Although there has not been found to be a conflict between these two uses the BOP must be recognized as the primary objective and use. Although mineral leasing (specifically only oil and gas) has not been curtailed - surface occupancy has been restricted on the lease stipulations. Oil and gas production and pumping simply is not compatible with night tank maneuvers or live military weapon firing.

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Objective Number

#3

Objective #3:

Review classifications and restore lands in the planning unit from withdrawal that are not suited or needed for the purpose for which they were originally withdrawn. Open them to operation of the public land laws; where management could be better accomplished under another agency's jurisdiction, initiate transfer through withdrawal procedures.

Rationale:

This is a Bureau-wide lands program activity policy and objective (Sec. 202(d) of FLPMA). Step 4 URA states there may be good opportunities for withdrawal restoration. In some instances, withdrawals and classifications are outdated or no longer needed and prevent full resource utilization on the lands affected. Bureau policy is to reduce the number of existing withdrawals, or the size to absolute minimum acres necessary.

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L-3.1: Multiple Use Recommendation

Conduct a comprehensive review of all withdrawals in the planning unit according to the district's withdrawal review schedule.

Revoke multiple overlapping withdrawals while retaining the one underlying withdrawal that provides protection adequate to meet existing and/or future agency needs.

Rationale:

A comprehensive inventory and review of all withdrawals is mandated in the Federal Land Policy and Management Act of 1976. This review should reveal additional restoration opportunities and result in the elimination of all withdrawals that are not proven absolutely necessary.

Support Needs:

Resource staff input for land reports.

Multiple Use Analysis:

No conflicts associated with review of withdrawals as mandated in FLPMA. Any subsequent restoration actions will be analyzed on a case by case basis.

Support -

M-3.1, 3.2, 4.1 and 5.1 - Support because they recommend mineral development.

Conflict -

CRM-4.1(5) - Involves vulnerable cultural resources whose only protection is withdrawal made for another purpose.

Note: Attach additional sheets, if needed

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Decision Factors -

Where an underlying withdrawal is retained, there is no conflict with cultural resources. Where withdrawals are completely lifted, it is the result of the withdrawal review process mandated by FLPMA and therefore not discretionary. If cultural resources have the dubious stature to be covered by a withdrawal made for another purpose and no longer needed, they should have their own protective designation.

Multiple Use Recommendation:

Accept as written.

Decision:

Accept as written.

Reason:

MFP III decisions should help guide the decisions of which withdrawals should be retained or revoked.

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#4

Objective #4:

Reserve suitable public lands to meet future needs for communication sites, public purpose R/Ws and cross-country utility right-of-ways through the establishment and protection of right-of-way corridors, reservation of lands for identified R/W needs, and the expansion of existing or establishment of potential communication site. Clear the records of any right-of-ways that are no longer needed.

Rationale:

It is a high Bureau priority to process energy related R/W's in an effort to help alleviate the nation's energy shortage. It is also Bureau policy to respond to all other R/W requests in an expeditious manner since they are normally concerned with public purpose needs. The communication media is expanding rapidly and competition for suitable equipment sites is expected to increase. Although no immediate needs were recognized in the PAA, with rapidly changing land ownerships and uses, suitable areas should be identified and reserved to meet future demands for various types of R/W's. The need for cross-country type utility corridors and the reservation and management for potential communication sites was also recognized in Step 4 URA. Removal of R/Ws no longer in existence or used is needed in order to reduce unnecessary land tenure encumbrances.

- * Cross-country utility corridors will help concentrate large utility projects which will reduce unsightly sprawl and environmental degradation. It will also help to eliminate unnecessary title encumbrances on any land that might go into private ownership.

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L-4.1: Multiple Use Recommendation

Confine major new utility R/W's (i.e. 500 KV or larger - 24" pipeline) to existing corridors, as depicted on overlay L-4.

Analysis:

This will minimize the overall environmental effects.

Decision:

Accept with following addition:

Will be subject to reasonable special stipulations necessary to protect other resource uses.

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Objective Number

#5

Objective #5:

Provide lands for exchange within applicable laws and regulations.

Rationale:

Nine exchange applications are currently on the books and some are over 10 years old. These should have some kind of decision, whether positive or negative. The above recommendation is intended to accomplish that.

Benefits:

Positive - Clear up case backlog.
- Improve public relations with applicants.

Negative - Proponents turned down might be upset.

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L-5.1: Multiple Use Recommendation

Classify public land on overlay #L-1 designated "PX" as suitable for exchange except as follows:

- (1) Reject PX application on lands shown on W/L MFP I overlay within long-billed curlew habitat (see W/L-2.6).
- (2) Reject PX application on lands within PLO 5777 unless higher quality raptor habitat within the study boundary is obtained (see W/L-5.2).
- (3) Continue to work on Duane Yamamoto case.
- (4) Complete work to allowance or rejection on any existing exchange proposal which has gone beyond the application stage.
- (5) Develop a comprehensive lands activity plan for exchange of private and state lands on an allotment by allotment basis considering land ownership and manageability within the following areas; from Mountain Home north to Forest Service boundary along Canyon Creek Road then west along Forest Service boundary to Blacks Creek Road then south to I-84 and back to Mountain Home.

The priority and/or criteria for establishing significance shall be:

- (1) Oregon Trail System
- (2) Mule deer crucial winter range
- (3) Mule deer winter range
- (4) Elk range
- (5) Antelope habitat

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Analysis:

These proposals have been on the books too long, some for over 10 years and a decision on whether to pursue them was overdue.

Decision:

Recommendation L-5.1, items 1, 2, 4 & 5 have been incorporated into Decision L-8.1. Item (3) has been incorporated into Decisions L-8.2.

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Objective Number

#6

Objective #6:

Provide lands to meet the public demand by selling isolated tracts.

Rationale:

We occasionally receive requests from people to acquire small isolated tracts of public land. Many of these requests involve legitimate needs and lands that serve no higher and better use.

Benefits:

Positive - Improved public image.
- Satisfy a need.

Negative - Could dispose of other resource values we are unaware of.

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L-6.1: Multiple Use Recommendation

Dispose of isolated tracts of 160 acres or less by sales that are not within the following areas of criteria:

- (1) Within PLO 5777 (see L-1.1 and W/L-5.1).
- (2) Oregon and Kelton Trail corridor (see R-1.1).
- (3) Within mule deer winter habitat (see W/L-3.2).
- (4) Within antelope habitat (see W/L-3.4).
- (5) Within one mile of urban development.
- (6) Adjoining perennial streams, rivers or reservoirs.
- (7) Grand View Duck Ponds (see W/L-5.4).
- (8) Within long-billed curlew area (see W/L-2.6).
- (9) Ferruginous hawk habitat (see W/L-2.3).
- (10) Within pheasant habitat (see W/L-4.2).
- (11) Presently have R&PP applications.
- (12) Presently have applications for permits for sand, gravel or cinders (see M-4.1).

Disposal should be by public sale under provisions of FLPMA but should not preclude consideration of R&PP or exchanges.

Analysis:

- * Scattered, isolated tracts that are expensive to manage and do not have public values for retention should be considered for disposal through sale at fair market value.

Decision:

This recommendation has been incorporated into Decision L-8.1A.

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Objective #7:

Provide opportunities for state and local governments to acquire sufficient lands to meet their needs for urban/suburban expansion, public purposes and communication needs.

Rationale:

Current growth and needs suggest that the above are adequate for meeting the anticipated growth in the near future. However, the BLM should be able to respond to unforeseen circumstances that are not of significant size or import warranting an amendment to the L.U.P. The system should provide the opportunity to respond on a case by case basis within the guidelines of the R&PP and FLMA.

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L-7.1: Multiple Use Recommendation

Public lands within the Kuna Planning Unit will be retained and managed in federal ownership except that public lands not specifically identified for disposal may be considered under the Recreation and Public Purposes Act of FLPMA for unforeseen community expansion needs or other public purposes.

Analysis:

Even though we have no proposals under the above items, we should recognize there could be in the future. The planning system must provide for their consideration on a case-by-case basis.

Decision:

This recommendation has been incorporated into Decision L-8.1.

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#8

Objective #8 (Replaces Objectives #1, 5, 6 & 7)

Determine through the land use planning process what public lands are suitable for retention in federal ownership and those lands which are not needed to meet public land management objectives.

Rationale:

Section 102(a)(1) of the Federal Land Policy and Management Act (FLPMA) of 1976 (Public Law 94-579) declares that it is the policy of the United States that "the public lands be retained in Federal Ownership, unless as a result of the land use planning procedure provided for in this Act, it is determined that disposal of a particular parcel will serve the national interest."

Executive Order #12348 established the Property Review Board which directed all Federal Agencies to review the assets under their jurisdiction and identify those that were excess to Federal needs. In the BLM this program is referred to as the Asset Management Initiative and involves identifying and disposing of public land that is no longer necessary to meet management objectives. Disposal of public land is authorized according to the criteria of Section 203 of FLPMA.

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L-8.1: Decision (Replaces L-1.1, L-5.1(1, 2, 4 & 5), L-6.1, and L-7.1)

- A. The lands within the Kuna Planning Unit are designated for retention in public ownership (Category I on Overlay D-1) except as noted in Multiple Use Decision L-8.2 and 8.3. Category I lands cannot be considered for sale without a plan amendment, except for those isolated tracts of 160 acres or less which are found suitable for disposal through the land report - environmental assessment procedures and which do not conflict with the criteria listed in Multiple Use Recommendation L-6.1(1)-(12). However, Category I lands may be considered under the Recreation and Public Purposes Act of FLPMA for unforeseen community expansion or other public purposes and for exchanges which (1) would benefit management programs of the BLM to a greater extent than would be realized through retention of the publiclands in Federal ownership, (2) instances in which the exchange has been directed by specific legislation, or (3) the exchange will aid in blocking Stateand Federal management units (see Instruction Memo W.O. 83-204). In most cases, public lands comprising important wildlife habitat (mule deer, elk, antelope, long-billed curlew, raptors, waterfowl, fisheries and upland game), the Oregon and Kelton Trail corridor, mineral resources, and similar resource values, will not be considered for exchange unless clearly in the public interest (see W/L-2.3, 2.6, 3.2, 3.4, 4.5, 4.2, 5.1; R-1.1, M-4.1). See Part C below on exchange limitations within the BOP Area, PLO 5777.
- B. As money and manpower become available, and if the priority increases due to public interest, develop a comprehensive lands activity plan for exchange of private and state lands on an allotment by allotment basis considering land ownership and manageability within the following areas; from Mountain Home north to Forest Service boundary along Canyon Creek Road then west along Fore Service boundary to Blacks Creek Road then south to I-84 and back to Mountain Home.

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The priority and/or criteria for establishing significance shall be:

- 1 Oregon Trail System
- 2 Mule deer crucial winter range
- 3 Mule deer winter range
- 4 Elk range
- 5 Antelope habitat

G. There will be no exchanges allowed within the boundary of PLO 5777 (BOP) except those that specifically enhance the BOP management program. W/L-5.2 has identified lands within the BOP area (PLO 5777 boundary) to be retained in federal ownership and managed primarily to protect the raptors/prey base habitat.

D. Agricultural Development in Category I:

Category I land is to be retained in federal ownership and therefore should not be disposed of under the Carey Act and Desert Land Entry laws. Existing and future applications should be processed as follows:

1. No action will be taken on existing applications until actions in the Agricultural EIS area south of the Snake River have been completed. Discourage any new applications on Category I lands in the Kuna Planning Unit.
2. After high priority agricultural lands have been classified (Ag EIS Area) process existing applications as follows:
 - a. First, reject any portions of DLE and Carey Act applications within:
 - (1) Oregon Trail Corridor (see R-1.1).
 - (2) Critical deer winter range (W/L-3.2).
 - (3) Grand View Duck Ponds (W/L-4.5).

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(4) Adjacent to perennial streams and reservoirs with fish or recreation values.

(5) Identified R&PP lands for county, state and cities.

(6) Curlew habitat (W/L-2.6).

b. Second, reject all applications on Category I land within the Cinder Cone Butte Critical Groundwater Area as well as any applications in Category II or III in the Cinder Cone Butte Critical Groundwater Area if there is not a water permit issued by the Idaho Department of Water Resources.

3. Action on applications inside the BOP Area (PLO 5777) will be suspended until either Congress acts or until the Sagebrush Rebellion Inc. vs the Secretary of Interior lawsuit is decided.
4. Applications received after 11/1/82 on Category I lands can be rejected work priorities permit based upon this land use decision.
5. Any future agricultural development of Category I lands will require a plan amendment, land report, EIS or EA, and done in accordance with the criteria listed in L-8.3D.

Reason:

The lands identified for retention are those needed for multiple use management. These lands are generally in block federal ownership and include environmental and/or economic assets of national and/or local significance. Included in Category I lands are WSAs, the Birds of Prey Study Area (PLO 5777), national historic trails, archaeological districts and sites which qualify for the National Register of Historic Places, and crucial wildlife habitat, as well as other multiple use lands. Limited adjustment in land ownership is available through exchanges and the recreation and public purpose act in cases which are beneficial to BLM management programs or which are essential for some unforseeable public purposes.

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A number of exchange proposals are pending in the planning unit and these should be processed according to the above decision.

Most of the isolated tracts in the Category I area have been identified for retention because of known resource values. However, a site specific evaluation of some of these tracts may indicate that they lack important resource values and would be suitable for transfer to Category II and subsequent disposal.

The Idaho Department of Water Resources has outlined Critical Ground Water Areas since this plan was started, and they are also trying state-wide to get a handle on water allocation. Within the Critical Ground Water Area there are water permits already issued which should have priority.

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L-8.2: Decision (Replaces L-5.1(3))

The lands identified as Category II on Overlay D-1 are suitable for disposal. Category III lands (see L-8.3) may become Category II lands and subject to disposal under the Bureau's Asset Management Initiative after further study and public involvement. In all cases, a detailed consideration of each individual tract, including a land report and environmental assessment, must be completed before a tract can be offered for disposal. The selected lands in the Yamamoto exchange proposal have been identified as Category II lands which can be disposed either through exchange or sale.

Reason:

The lands identified for disposal include small isolated tracts with no known public resource values and tracts of land which have been classified suitable for agricultural development and have met the criteria of L-8.3D.

Yamamoto has been leasing tracts IIA on Overlay D-1 for agricultural purposes for the past six years. Although within the BOP area, there are no apparent resource conflicts with disposal of this land either through exchange or sale. The land was being leased for agricultural use prior to PLO 5777 through a Bureau of Reclamation authorized permit. After the Reclamation withdrawal was revoked, the tracts have been leased to Yamamoto by BLM. A non-competitive sale to Yamamoto should be the first priority for disposal of this tract.

After further study, some Category III lands may be transferred to Category II. Site specific analysis of these lands was not possible during the land use planning process and therefore tracts which might contain important wildlife, cultural, mineral and other significant resource values have not yet been identified. Public input will also be considered prior to transferring any land from Category III to Category II for possible disposal.

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L-8.3: Decision (Replaces L-1.1 and L-6.1)

- A. Public lands which require further study in terms of site specific analyses a public involvement, but which appear to be suitable for disposal under the agricultural land laws and/or public sale laws have been identified as Category III lands on Overlay D-1.
- B. After further study, Category III lands which are found to have important wildlife, cultural, historic, recreational, mineral or other public values will be placed in Category I and retained in federal ownership (see L-8.1).
- C. Category III lands must meet the sale criteria of Section 203 of FLPMA and any of the general criteria listed below before placement in Category II for disposal:
- 1) Lands which are proximate to cities, towns, or development areas.
 - 2) Scattered non-urban tracts so located as to make effective and efficient management impractical.
 - 3) Lands designated for agricultural, commercial, or industrial development as the highest value or otherwise most appropriate use.
- D. Category III lands will be classified for agricultural development and placement in Category II as follows:
- 1) Class I, II and III soils will be classified as suitable for agricultural development in accordance with the 1980 Decision Document for the Agricultural Development EIS unless identified for retention according to part B above. Suitable lands with present DLE or CA applications will be processed first. Suitable lands without applications may be available for disposal under the public land sale laws and the Bureau's Asset Management Initiative.

Note: Attach additional sheets, if needed
(Instructions on reverse)

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

MANAGEMENT FRAMEWORK PLAN
RECOMMENDATION-ANALYSIS-DECISION L-8.3

Name (MPP)	
Kuna	
Activity	
Lands	
Overlay Reference	
Step 1 :	Step 3 D-1

- 2) Disposal should be made in an orderly manner, such as in blocks. BLM should coordinate with county officials, state agencies, utility supplies and existing users to determine a proper disposal sequence in order to allow for optimum orderly development with minimum disturbance to existing users. Upon completion and identification of a new block, an EIS or EA will be written. The classification system will include the same criteria as used in the Decision Document for Ag EIS area.
- 3) Disposal of lands through sale or exchange under provisions of the Federal Land Policy and Management Act should be considered a priority, whenever possible, over disposal through Desert Land and Carey Act applications.
- 4) Desert Land or Carey Act applications will be rejected in areas designated as water management areas by the Idaho Department of Water Resources unless the Idaho Department of Water Resources allows a water permit in a reasonable time.

Reason:

See reasons for L-8.1 and L-8.2.

Category III lands require site specific evaluation before determining if they should be retained or offered for disposal.

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

MANAGEMENT FRAMEWORK PLAN - STEP 1
ACTIVITY OBJECTIVES

NOV 16 1981

Name (MFP)

Kuna

Activity

Lands

Objective Number

#1

Objective #1:

Provide public lands having suitable soils to meet the demand for agricultural development.

Rationale:

Idaho's economy is heavily dependent on agriculture. The Bureau's responsibility under FLPMA is to retain and manage the public lands unless it is in the National interest to dispose of them. As agricultural lands go out of production due to urban expansion (occurring at the rate of 3,000,000 acres annually nationwide), other lands will have to be brought into use if output is to remain constant. "The policy of the Idaho Water Resource Board is to seek an orderly growth of agricultural production in the state at a rate sufficient to maintain the state's current share of the national and international market." Improvements in technology might somewhat offset the acreage losses but not by much. The further development of lands for agricultural purposes in Idaho will be limited by water availability and economic feasibility. These two issues are so complex that it is virtually impossible to resolve them at this time. For example, no one knows how much more water can be taken from the Snake River before it starts hurting other irrigators or reduces power generation capability. And if power generation capability is reduced while demand increases because of the added irrigation pumps, what happens to economic feasibility when new and costlier power generation facilities (e.g. coal fired plants) are brought on line. It may be that these issues can only be resolved through the trial and error process.

Benefits

Positive - Assist in maintaining Idaho's national position in agriculture.
- May help stabilize the agricultural economy.
- Should reduce demand for Desert Land Entries.
- Might help satisfy Carey Act commitment.

Negative - Improper timing could cause instability in economy.
- Could precipitate a "land rush".
- Could adversely affect non agriculturally related areas (increased power rates, more farm subsidies, etc.).
- Could reduce land available for grazing.