

APPENDIX K

CONSULTATION AND AGENCY LETTERS RECEIVED ON THE DRAFT PLAN/EIS

This appendix includes copies of letters received as a result of government-to-government consultation with Tribes, consultation with the State Historic Preservation Officer, the U.S. Fish and Wildlife Service, and the Resource Advisory Council, as well as other letters received from state and local governments.



February 28, 2005

Craters of the Moon National Monument Planning Team
Bureau of Land Management
Shoshone Field Office
PO BOX 2-B
400 West F Street
Shoshone, ID 83352-1522

Jim Morris, Superintendent
Craters of the Moon National Monument
PO BOX 29
Arco, ID 83213

RE: CRATERS OF THE MOON RMP

The Shoshone-Bannock Tribes (Tribes) would like to thank the National Park Service (NPS) and the Bureau of Land Management (BLM) for continuing Tribal participation in the development of this Management Plan. The Shoshone-Bannock Tribes staff has met with Planning staff from both the BLM and the NPS, and submits the following comments.

After consideration of the four alternatives, the Alternative C is most protective is the environment, which is the preferred alternative by the Tribes, It may be more restrictive to all including Tribal members, but it does the most to protect the integrity of the ecosystem.

As a part of the ongoing consultation process, the BLM and NPS staff recently came to Fort Hall to review and discuss the DRAFT Management Plan/Environmental Impact Statement for the Craters of the Moon National Monument and Preserve.

Previously, the Tribal staff requested a written response to previous comments submitted; we have received that, and based from that letter and review of the DRAFT EIS, these additional comments are being submitted.

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The Shoshone-Bannock Tribes have both reserved treaty rights to hunting, fishing and gathering off-reservation, and have the tribal traditional values and perspectives to protect, which includes NPS and BLM resources. As clearly stated in the November 15, 2000 Presidential Proclamation 7373, Boundary Enlargement of the Craters of the Moon National Monument, "nothing in this proclamation shall be deemed to enlarge or diminish the rights of any Indian tribe." Please clarify this in the section discussing the reserved rights of the Tribes.

General Comments:

Again, the Tribes request to include in your list of required laws and statutes that the federal agencies must follow, the consultation requirements for government to government consultation between the Tribes and BLM/NPS.

Please conduct a global check for correct spelling for the Shoshone-Bannock Tribes.

Additional signs or interpretative features needs to be developed to inform the public about resource protection.

Specific Comments:

What is the BLM and NPS definition of short and long term?

No mention of Tribal Scoping was made in the section discuss Scoping.

In the listing of Issues and concerns identified, even though the Tribes focused explicitly on the Tribes reserved Treaty rights, no mention was made of this in the Issues and Concerns.

Page 111, Chapter 3, American Indian Rights and Interests. As stated in the November 15, 1999 Presidential Proclamation 7373, Boundary Enlargement of the Craters of the Moon National Monument, Therefore include the this in the list of Planning Criteria.

Page 17, Environmental Justice. Please include the following statement: This area is important to the Shoshone-Bannock Tribes, whose members retain and exercise the right to hunt, fish and gather for subsistence purposes, in accordance with the Fort Bridger Treaty of 1868. Geographically, the physical boundary of the Fort Hall Reservation is not immediately adjacent to Craters of the Moon, but Tribal members do travel to public lands, including Craters and other BLM lands to exercise their rights off reservation. Environmental Justice is not determined by geographical distance; Shoshone-Bannock Tribes reserved rights are applicable to all unoccupied lands of the US.

Page 17, Carrying Capacity. The Tribes support the limited development of the Craters of the Moon area, emphasizing managing to achieve the desired resource conditions, rather than based on resource users.



Page 24, Management Guidance Common to all Alternatives. Include a statement of the Tribes Treaty rights and traditional cultural rights the Tribes retain, and that none of these alternatives will diminish these rights. We would like to have the agencies protect, restore and enhance, when necessary, throughout the alternatives for this plan. It will not be acceptable to have diminishment of any rights the Tribes retain, as a part of any Alternative.

Page 25, Vegetation. Regarding Fire, in all alternatives, the Tribes would like to see BLM/NPS management work to restore the natural fire regime. All of the Alternatives discuss full fire suppression outside of the pristine zone, which is where the majority of impacts will occur. Full fire suppression would allow for long term benefits to ethnographic resources, but can only see short term benefits for traditional use areas and the exercise of treaty rights because habitat would be allowed to reach a late seral stage and plants communities that are early seral stage would be lost; fire is important to the ecosystem.

Page 27, Cultural Resources, Archaeological and Historical Resources. We don't want to limit the meetings with the Shoshone-Bannock Tribal staff and official Tribal government consultation to only those projects that may have an adverse impact. Add in the Management Actions, the following statement: Regular and periodic meetings will take place with the Shoshone-Bannock Tribes to discuss any impacts, both beneficial and adverse, to traditional cultural resources, including archeological resources.

Page 28, American Indian Rights and Interests (Resources, Resource and public land values, Treaty rights). Change this topic heading to read "American Indian Rights and Interests". Delete resources, resource and public land values.

Page 28. American Indian Rights and Interests. Include in the Desired Future Conditions the desire to protect and enhance reserved rights under the 1868 Ft. Bridger Treaty between the Shoshone-Bannock Tribes and the US Government, for specific off reservation rights.

Page 28, American Indian Rights and Interests. Under the 3rd bullet, add the following clause to this sentence, ".....regarding their treatment, or as per official Shoshone-Bannock Tribes request."

Page 28, Land Use and Transportation, Access and Travel. Please include the following statement. The agencies will work cooperatively with Tribal governments to ensure appropriate access to the Monument within the Monument.

Page 29, Lands and Realty. Provide a statement that any proposed Enhancement/Expansion of boundaries will not affect any rights reserved to the Shoshone-Bannock Tribes, nor result in diminishment of rights.

Page 29, Land and Realty. Provide in the Management Actions a statement to ensure Shoshone-Bannock Tribes official government consultation will occur for any land exchange, land disposal and land acquisitions.

Page 31, Visitor Experience, Interpretation/Visitor Understanding. In the Desired Future Conditions, insert a DFC for providing a greater understanding of Tribal perspectives of this area, and the importance Tribal members have had and continue to have for this unique area. Provide in the Management Actions, a bullet to ensure regular communication and cooperation with the Tribes for developing these interpretations.

Page 31, Recreation. Include in the DFCs the desire to provide improved ecosystem management to ensure recreationists are not compromising the natural and cultural resources. Also, the management plans, current and future plans, needs to have appropriate law enforcement by federal agencies.

Page 32, Social and economic conditions. Current and past land uses have impacted traditional and cultural values important to the Shoshone-Bannock Tribes. Traditions and ceremonies have been impacted from non-Indian activities. Tribal economics are impacted as the use of natural resources are important to provide subsistence uses for Tribal members. Shoshone-Bannock Tribes demographics must be included, including the unemployment rate (especially seasonal) to demonstrate the importance of subsistence hunting/fishing/gathering. This also includes the number of tribal members enrolled.

Page 33, Alternative A. Include a statement regarding the Tribes Treaty rights and cultural resources that have not been previously acknowledged as a part of any of the previous plans listed. The No Action Alternative provides little to no management actions for Treaty rights or cultural resources.

Provide equal consideration and evaluation of Tribal concerns for all the Alternatives, as required for all resources.

Page 52, No Hunting within the Monument. Please state the rights the Tribes retain under the Ft. Bridger Treaty for hunting, in this section.

Page 57, Cultural Resources. The Tribes needs to be included with cultural resource management activities, including land-modifying activity, inventories, surveys and any other activities, to ensure the highest standards of protectiveness for the resources.

Page 110, Archaeological and Historical Resources, 2nd paragraph. Revise the following sentence from, "Today it is known that Native Americans used this area much more than was originally believed," to read as follows..."Today it is known that Native Americans used this area much more than was originally believed by archaeologists."



Page 111, American Indian Rights and Interests, Ethnographic Resources. Replace the 2nd sentence with the following paragraph. "Based on Shoshone-Bannock Tribal ethnographic legends and information, Indians have traveled throughout the Salmon River Basin and the Snake River Basin, following subsistence resources based on the seasons. Some bands traveled to the Camas Prairie area to gather plants, others traveled to buffalo country, and other went to the Salmon and Snake rivers for fish. The different bands of Shoshone and Bannock all have their place names for specific areas and locations within this region, which includes the Craters area. Indians have always used the unique features of the Craters area for various uses, and continue to hold this area sacred and important."

Page 111, American Indian Rights and Interests. 2nd paragraph, 3rd sentence. Revise the sentence to read as follows: "Article 4 of the Fort Bridger Treaty reserves the right to continue to hunt, fish, and gather traditional resources off reservation, on unoccupied lands of the United States. It also provides associative rights necessary to effectuate those rights on unoccupied lands. Unclaimed lands have been determined by case law to include Forest Service and BLM-administered lands. Please move this paragraph to the Treaty Rights section."

Page 111, 3rd paragraph. Move this paragraph to the Treaty Rights section.

Page 112, Native American Traditional Use and Treaty Rights. Remove the first sentence. In the next sentence, delete the word "public;" use the word "unoccupied."

Page 112, N/Am Traditional Use and Treaty Rights. 2nd paragraph. Do not include the discussion on IDFG when discussing Treaty rights. Include the following paragraph: The Shoshone-Bannock Tribes Fish & Game Department provides enforcement for Tribal members, under the 1975 Fish and Game Code, which set regulations for Tribal members to hunt and fish on and off reservation.

The whole discussion on hunting, paragraphs 3 and 4 should be deleted or moved to a different section dealing with non-Tribal members hunting. It is not applicable to this section.

Page 116, Livestock Grazing. Ensure that any grazing activities do not adversely impact Traditional native plants important to the Tribes. Regular meetings with the Tribes are necessary to ensure appropriate management is conducted for grazing purposes.

Page 133, Hunting. Do not attempt to quantify the hunting by Tribal members; delete the clause "very small amount of."

Page 139, Social and Economic Conditions, Overview. Demographic information from the Tribes needs to be included in this section.

Page 147, Analysis Assumptions and Guidelines. What assumptions or guidelines were used to address Tribal Treaty rights and consultation obligations?

Page 195, Alternative A- "For the most part, Tribal treaty rights excised on adjacent federal lands outside the Monument would be consistent with those exercised in the expanded Monument and Preserve." Strike out "For the most part."

Page 197, Alternative B- "Tribal treaty rights exercised on adjacent federal lands outside the Monument would be mostly consistent with those exercised in the expanded Monument and Preserve." Strike out "mostly".

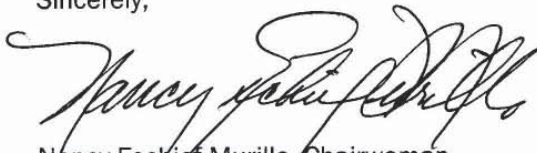
Page 198, Alternative C- Change the sentence as per previous comment.

Page 199, Alternative D- First sentence, "...resources from Alternative C..."; should be Alternative D.

Page 249, Consultation with Native American Tribes. Formal government to government consultation has been initiated with the Tribes, and will be completed between the appropriate Tribal decision-makers when the Plan is Final.

The Tribes look forward to continuing to work with your staff to develop these Management Plans for the Craters of the Moon National Monument and Preserve. If you have any further technical questions, please call Claude Broncho at 238-239-4563 or email him at cbroncho@shoshonebannocktribes.com or Yvette Tuell at 208-239-4552 or email her at ytuell@shoshonebannocktribes.com.

Sincerely,



Nancy Eschier Murillo, Chairwoman
Fort Hall Business Council
Shoshone-Bannock Tribes

CC: Chad Colter, Shoshone-Bannock Tribes
Claude Broncho, Shoshone-Bannock Tribes
Yvette Tuell, Shoshone-Bannock Tribes
Carolyn Smith, Shoshone-Bannock Tribes
Land Use Policy Commission (3)
File



January 20, 2005

Rick Vandervoet, Monument Manager, (BLM)
James A. Morris, Superintendent CRMO, (NPS)

Dear Rick and Jim,

Re-Twin Falls District BLM-RAC comments on Craters of the Moon National Monument.

We're a new RAC; however, some of our members have transferred from the USRD RAC and have followed and participated in the planning process from the beginning. Our new members offer a fresh perspective, thus we offer some observations.

We believe the Management Plan represents a reasonable compromise. We are pleased the process that produced the plan encouraged public involvement, and preferences expressed by the public were not ignored. We recall that many Idahoans reacted negatively to the Presidential Proclamation of November 2000. Providing citizens with the opportunity to shape "The Monument" has begun to restore the public's trust. An unexpected bonus is co-management by NPS and BLM. For two agencies with different goals and direction to come together and jointly plan and combine their respective expertise is remarkable and commendable.

A member of our sub-group participated in the "Choosing by Advantage" process in selecting the Preferred Alternative. While we recognize no alternative will please everyone and perhaps no one is pleased with every aspect of any plan, we believe the plan is responsive to the Proclamation and to the needs of those citizens most likely to suffer economic hardship due to new rules.

As we studied the Draft Management Plan/EIS, some RAC members noted how complex and sometimes overlapping existing environmental regulations have become. For example, the information submitted by the U.S. Environmental Protection Agency was detailed and specific. It was observed by some RAC members that current land use law allows federal land use managers little latitude in decision making.

In reviewing comments from the public, we noted respondents proximity to the area seemed to influence their response; with those living closer desiring more flexibility and those living farther away more concerned with preservation. We hope the plan and its implementation can accomplish the best of both.

In summary, we believe the plan was developed using sound methodology and procedure. It reflects citizen input within the spirit of the Proclamation. Continued citizen involvement is desirable and necessary over the life of the plan.

Sincerely,



Kelly Adams, Chairman
Twin Falls District BLM-RAC



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United States Department of the Interior

FISH AND WILDLIFE SERVICE

EASTERN IDAHO FIELD OFFICE - ES

440 BURLEY DR., SUITE A

CHUBBUCK, IDAHO 83202

Telephone (208) 237-6975

Fax Number (208) 233-8213



JAN 10 2005

Memorandum

To: Craters of the Moon National Monument Manager, Bureau of Land Management.
Shoshone Field Office, Shoshone, Idaho

From: Supervisor, Fish and Wildlife Service, Eastern Idaho Field Office, Chubbuck,
Idaho

Subject: Endangered Species Act Section 7 Consultation for the Craters of the Moon Land
Use Plan – Concurrence File # 1035.0150 OALS # 1-05-I-0088

This letter transmits the Fish and Wildlife Service's (Service) concurrence on determinations for listed species as documented in the Biological Assessment of the Effects of the Craters of the Moon National Monument and Preserve Land Use Plan (Assessment). In a letter dated December 17, 2004, and received by the Service on December 29, 2004, the Bureau of Land Management (Bureau) requested concurrence with effects determinations under section 7 of the Endangered Species Act (Act) of 1973, as amended, that the proposed Craters of the Moon National Monument (Craters Monument) Land Use Plan (LUP) may affect, but is not likely to adversely affect gray wolves (*Canis lupus*).

In 1994 the Service published a Notice of Availability in the Federal Register concerning the reintroduction of gray wolves into Idaho, Montana, and Wyoming. In 1995 and 1996 wolves designated as nonessential experimental populations were reintroduced into central Idaho and the Greater Yellowstone Area. Within the central Idaho area, the nonessential experimental population areas are those portions of Idaho south of Interstate Highway 90 and west of Interstate Highway 15. The portion of the gray wolf Yellowstone Management Area in Idaho (that portion in Idaho east of Interstate Highway 15) also is designated as a nonessential experimental population area. However, Section 10j of the Act requires that any nonessential experimental population located within a National Park System or National Wildlife Refuge System unit is treated as a threatened species (whereby standard consultations are conducted). Because portions of the Craters Monument are managed by the National Park Service (NPS), standard consultation procedures for the Craters Monument LUP are being conducted for gray wolves.



The proposed action is to implement a LUP (combined Bureau Resource Management Plan and NPS General Management Plan). The LUP would include: 1) rehabilitation of up to 80,000 acres of degraded sagebrush-steppe habitat; 2) identification of use intensity areas or management zones to guide long-term management goals; 3) the designation of roads; 4) the utilization of rangeland health standards and guidelines to achieve a healthy range ecosystem; and 5) the general protection of resource qualities for which the Monument was designated.

Based on the information provided in the Assessment, the Craters LUP meeting I attended on September 23, 2004, and several conversations I had with Paul McLain of your office, we concur that the proposed Craters Monument LUP may affect, but is not likely to adversely affect gray wolves.

This concludes informal consultation on the Craters Monument LUP under section 7 of the Act. If the proposal addressed in this letter is modified, environmental conditions change, or additional information becomes available regarding potential effects to listed species, you should verify that your conclusions are still valid.

Thank you for your continued interest in the conservation of threatened and endangered species. If you have any questions regarding the above Service comments, please contact Sandi Arena of this office at 208-237-6975 x 34.

cc: NPS, Arco (Morris)



Our mission: to educate through the identification, preservation, and interpretation of Idaho's cultural heritage.

Dirk Kempthorne
Governor of Idaho

Steve Guerber
Executive Director

Administration
1109 Main Street, Suite 250
Boise, Idaho 83702-5642
Office: (208) 334-2682
Fax: (208) 334-2774

Archaeological Survey
210 Main Street
Boise, Idaho 83702-7264
Office: (208) 334-3847
Fax: (208) 334-2775

Capitol Education Center
Statehouse/P.O. Box 83720
Boise, Idaho 83720-0001
Office: (208) 334-5174

Historical Museum and Education Programs
610 North Julia Davis Drive
Boise, Idaho 83702-7695
Office: (208) 334-2120
Fax: (208) 334-4059

Historic Preservation Office
210 Main Street
Boise, Idaho 83702-7264
Office: (208) 334-3861
Fax: (208) 334-2775

Historic Sites Office
2445 Old Penitentiary Road
Boise, Idaho 83712-8254
Office: (208) 334-2844
Fax: (208) 334-3225

Library/Historical and Genealogical Collection
450 North Fourth Street
Boise, Idaho 83702-6027
Office: (208) 334-3356
Fax: (208) 334-3198

Oral History
450 North Fourth Street
Boise, Idaho 83702-6027
Office: (208) 334-3863
Fax: (208) 334-3198

Memberships and Outreach and Development
1109 Main Street, Suite 250
Boise, Idaho 83702-5642
Office: (208) 334-3986
Fax: (208) 334-2774

Publications
450 North Fourth Street
Boise, Idaho 83702-6027
Office: (208) 334-3428
Fax: (208) 334-3198

State Archives/Manuscripts
2205 Old Penitentiary Road
Boise, Idaho 83712-8250
Office: (208) 334-2620
Fax: (208) 334-2626

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May 17, 2004

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Mr. James A. Morris
National Park Service
Park Headquarters
P.O. Box 29
Arco, Idaho 83213

Mr. Rick Vander Voet
Bureau of Land Management
Shoshone Field Office
400 West F Street
Shoshone, Idaho 83352

RE: Craters of the Moon National Monument and Preserve (Monument) Draft Environmental Impact Statement (EIS) and Management Plan (Plan) for Craters

Thank you for requesting our views on the Draft EIS and Management Plan for Craters of the Moon National Monument. Our comments on the document are provided below:

1. Page 110, Prehistoric and Historic Sites: The first sentence in this section states that there are 346 known, recorded cultural resources in the Monument. According to our records, 1149 archaeological sites have been recorded within the Monument.
2. pp. 193-194: While we are not opposed to Alternative #4, we question the statement at the bottom of p. 193 and top of p. 194 that begins with: "Because there would be no major adverse impacts on a resource or value whose conservation is..." We wonder how the NPS and BLM can make this statement when so little is known about the number and nature of sites within the monument (only 5% of the Monument has been surveyed), and the effects of increased visitor use. This, coupled with insufficient professional staff to monitor effects and identify historic properties, leaves much to be learned about the fate of Monument's cultural resources.
3. Outfitters and guides should receive some training in cultural resource laws and ethics.



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Comments from the Idaho SHPO

May 17, 2004

page 2

4. Finally, we are pleased to learn that, under Alternative 4, the National Park Service (NPS) and Bureau of Land Management (BLM) plan to support a Section 110 program at the Monument that will include on-going Section 110 survey, public education, interpretation, monitoring, and the preparation of a Cultural Resource Management Plan. As you know, however, the BLM has two archaeologists for the entire Shoshone, Idaho Falls, and Pocatello districts; the National Park Service has no archaeologists in southern Idaho. With such limited staff and so many acres, we question how your agencies can fulfill the cultural resource commitments of Alternative 4 without additional professional staff. We urge you to include as part of this GMP and EIS a parallel commitment to hire the professional staff needed to implement this program and fulfill the obligations outlined in this document.

We appreciate your cooperation. 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: Lisa Cresswell, BLM
John Apel, NPS
Stephanie Toothman, NPS
Stan McDonald, BLM
Dick Hill, BLM



United States Department of the Interior

FISH AND WILDLIFE SERVICE
EASTERN IDAHO FIELD OFFICE - ES
4425 BURLEY DR., SUITE A
CHUBBUCK, IDAHO 83202
Telephone (208) 237-6975 Fax Number (208) 237-8213

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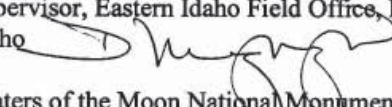
SHOSHONE F.O.

TAKE PRIDE
IN AMERICA

August 31, 2004

Memorandum

To: Craters of the Moon National Monument Planning Team (Attn: Barbara Bassler),
Shoshone Field Office, Bureau of Land Management, 400 West F Street,
Shoshone, Idaho 83352

From: Supervisor, Eastern Idaho Field Office, Fish and Wildlife Service, Chubbuck,
Idaho 

Subject: Craters of the Moon National Monument and Preserve Draft Management Plan
and Environmental Impact Statement.
File #1035.0150 FWS #1-4-04-0183

The U.S. Fish and Wildlife Service (Service) has reviewed the Bureau of Land Management (BLM) and National Park Service's (NPS) Craters of the Moon National Monument and Preserve (Monument) Draft Management Plan and Environmental Impact Statement (DEIS). The following comments are offered for your use and consideration:

General Comments

With regard to the alternatives presently under consideration in the DEIS, the Service supports selection of Alternative C as the preferred alternative. The Service believes that Alternative C, as it reads presently, meets the goals of the Monument more closely than does the stated preferred alternative, Alternative D.

Restoration of native plant communities, protection of soils, and protection and restoration of sage grouse habitat have all been identified as objectives in this DEIS. Even though livestock grazing and its associated activities (road development, introduction of invasive species, plantings of non-native forage, habitat fragmentation due to fencing) have been consistently identified as impacts in the DEIS, no alternative provides BLM the tools to reduce the numbers and/or change the timing and movement of livestock within the Monument in order to meet the goals presented in this document. On page 52, the DEIS states that elimination of livestock was



not considered in any of the alternatives because a “no grazing” alternative would not be consistent with the language in Proclamation 7373 (Federal Register, v.65 pp 69221). Nonetheless, the proclamation states that livestock grazing will continue to be managed in a way that is consistent with BLM regulations and policy. BLM policy and regulations certainly allow for removal and/or reduction of livestock to meet management objectives.

The Service is specifically identifying grazing as a concern because a number of allotments within the Monument are not meeting standards at this time. The Service is not necessarily endorsing an alternative that proposes the elimination of livestock grazing, we are merely stating that as a document of disclosure and public review, the range of alternatives should include possible modifications to a land use (grazing) that can have profound impacts on the very resources the BLM and NPS have identified as priorities. We strongly recommend that an alternative be developed and considered that would provide the BLM with the tool of modifying livestock numbers and distribution, as necessary, to meet management objectives.

We believe that implementation of Alternative C will result in more acreage of restored sagebrush steppe community than is reported, and perhaps as much as Alternative D. The removal of trails and roads, and other limitations on disturbance in the pristine areas should result in passive restoration of those areas. The Service recommends that the final document estimate the number of acres that will be improved in all alternatives due to natural recovery.

Alternative D’s proposed maintenance and reclassification of roads, and the planting of non-native forage could retard recovery of native plant communities needed by sage grouse and other sage-obligate species. The DEIS has identified improved roads and the establishment and spread of non-native plant species as impacts to the system and yet has chosen an alternative that facilitates these actions more than other alternative(s). The maintenance of roads for the purposes of administrative and fire suppression will only facilitate the use of these roads by the public. This is a reoccurring process throughout the west that has shown to expedite the spread of noxious weeds and increase the frequency of man-made fires.

The Service recommends that pygmy rabbit populations and their potential habitat within the Monument be identified and each alternative be assessed for its potential impact on pygmy rabbit populations. This sagebrush obligate species is identified by the BLM as a sensitive species and by the Idaho Fish and Game as a game species of special concern. Many public lands activities could have negative impacts on pygmy rabbits and their habitat, including off highway travel, hunting, fire (both prescribed and wildfire), livestock grazing, and pesticide use. In particular, we suggest that proposed fire projects be scrutinized carefully with regard to the potential for impacts to this species. Pygmy rabbits are reluctant dispersers and do not do well over large

fragmented habitats. The timing, shape, size and juxtaposition of a fire footprint on the landscape are important considerations when managing for pygmy rabbits.

The Service recommends that the final document identify where the areas to be restored are located in relation to areas of sage grouse habitat, cattle allotments that are or are not meeting standards, healthy seed source areas for sagebrush and associated native vegetation, pygmy rabbit habitat, and habitat for neo-tropical migrant birds that are obligate to certain stand densities (often different from sage grouse needs) such as sage sparrow, Brewer's sparrow, and sage thrasher. This is necessary information to disclose in order for the public and interested agencies to assess the impacts the different alternatives may have on "public trust" resources.

It is unclear why some of the goals identified under Alternative D are not common to all alternatives. These include control of public access to caves and other geological features that are experiencing recreation-related damage, promotion of off-site partnerships for Monument education and interpretation, encouraging commercial outfitters/guides to offer varying experiences, emphasizing safety and protection at access points, and expanding education at off-site locations. We see no reason why these should not be goals common to all alternatives.

The Service recommends that the preferred alternative include the designation of Laidlaw Park as an Area of Critical Environmental Concern (ACEC). ACECs include public lands where special management attention and direction is needed to protect and prevent irreparable damage to important historic, cultural, and scenic values, fish, or wildlife resources or other natural systems or processes; or to protect human life and safety from natural hazards. ACEC designation indicates that the management agency recognizes the significant values of the area and intends to implement management to protect and enhance the resource values. We understand that all ACEC's are considered land use authorization avoidance areas as they are known to contain resource values that will pose special constraints for and possibly denial of applications for land uses that can not be designed to be compatible with the management objectives and prescriptions for the ACEC.

If the preferred alternative does include designation of Laidlaw Park as an ACEC, then the Service recommends the final document include management objectives and prescriptions to implement a resource management regime for Laidlaw Park's unique vegetative features.

Specific Comments

Page 45 - Alternative C; Access and Travel; Management Actions: It would be useful if the document identifies the roads that would be converted for this and the other alternatives. This is important for assessing road impacts to sensitive species such as pygmy rabbits and sage grouse, as well as other species of interest.

Page 46 - Alternative C; We suggest that "no new livestock developments in the proposed Laidlaw Park ACEC" may be too restrictive. If this alternative were chosen and the BLM subsequently finds that moving livestock facilities to a new location within the proposed ACEC



would be beneficial to wildlife and native plant communities, they would be unable proceed because of this restriction. If the absolute number of developments in the proposed ACEC is the issue, we recommend that the statement read “no net increase of livestock developments or the acreage they impact and no new developments unless it results in a net benefit to those resources identified as needing improvement or protection.” This would allow moving fence and water developments to new locations if it resulted in a net gain in overall plant community health in Laidlaw Park.

Page 49 - Alternative D; Vegetation; Management Actions, 2nd bullet: It is unclear how active restoration/rehabilitation of 80,000 acres of annual grassland and low elevation sagebrush steppe will impact use of livestock allotments in those areas being treated. Livestock allotted to areas being treated by fire and other mechanisms (mechanical, chemical) will need to go elsewhere in many cases. The Service recommends that the final document disclose the destination of displaced livestock, what success criteria will need to be met before they can be placed back on the treated allotment, whether or not other BLM allotments will be used to support the displaced livestock, or what contingency plans will be in place if the treated areas do not meet success criteria within the predicted time frame. These nuances are very important when assessing the utility of an action or an alternative that calls for a particular prescription.

Page 49 - Alternative D, Vegetation; Management Actions, 6th bullet: The statement suggests that there are objectives that would conflict with wildland fire other than life and property protection and that these objectives are known and prioritized. We recommend these be identified and their priority justified in the final document. The reader cannot judge the applicability or utility of a management action without this knowledge.

Page 50 - Alternative D; Access and Travel; Management Actions: bullets 1, 3, and 5: These actions will facilitate habitat degradation, fire frequency, noxious weed infestation, vandalism and theft of cultural and geological resources by allowing better and more frequent motorized access to these areas. Proclamation 7373 specifically sets aside these lands “for the purpose of protecting the objects identified above (lava flows, kipukas, natural landscapes).” The Service believes that access should not take precedence over the integrity and health of lands identified in the proclamation. We suggest that Class C and D roads and temporary roads could accommodate the management activities proposed in all alternatives.

Page 55 - Environmentally Preferred Alternative: The Service has concerns with the statement that Alternative D best meets the definition of the Environmentally Preferred Alternative. The proposed reclassification and maintenance of roads conflicts with Section 101 of the National Environmental Policy Act (NEPA) which burdens the federal government to “Preserve important

historical, cultural and natural aspects of our natural heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choice.”

Several allotments, including the proposed ACEC in Laidlaw Park, are not meeting rangeland health standards. All of the alternatives, including Alternative D, do not provide the tool of reducing or eliminating livestock grazing, whether temporary or permanent, in areas not attaining standards.

The document states (on Page 55, first column, second paragraph) that Alternative D does not expand or upgrade routes within the Monument. This conflicts with statements made on pages 43, 49, 50, 61, 68, 69, and 70. Overall number of roads and miles of roads do not change markedly between Alternative C and D, but the classifications of the zones within which these roads are located change dramatically between these two alternatives. Alternative D appears to have a lower number of road-miles in Primitive Zones, but that is because the size of these zones is reduced in this alternative. The Pristine Zone of Alternative D has 100,000 fewer acres than that of Alternative C and the Passage Zone in Alternative D is 3 times the size of the Passage Zone in Alternative C.

It is our opinion that the alternative identified to best meet national environmental goals would be the one that maintains and protects the integrity of the largest section of landscape. As currently written, Alternative C provides this best. However, we see the opportunity to modify either Alternative C or D to incorporate the best actions under both alternatives.

Page 59 - Natural Resources; Alternative B, C, and D: The rationale for different target acreages between alternatives is unclear. In addition, it is unclear what the differences are between Alternative C and D in the last row of the table.

Page 67 - Table 8; Summary of Impacts; Geological Resources: The Service believes that the maintenance and improvement of roads, along with the reduction of acres in the Pristine Zone, would result in an increase of damage from visitors and would compromise restoration efforts, contrary to the statement made herein.

Page 68 - Table 8; Summary of Impacts; Vegetation and Fire Management: Although less active restoration (in acres) would be realized in Alternative C, more passive restoration would be realized by the reduction of access and motorized activities. The rate of restoration may be slower in some areas but higher in others because of the lack of disturbances such as mechanized activities, planting of non-native forage species, and reduced probability of human-induced fire. This would result in a larger area of restored ecosystem, even if it takes a longer period of time. There would be less opportunity for noxious weed management in Alternative C, but there should be less need for it as well. Many of the restoration activities outlined in Alternative D will need to be applied repeatedly because of ongoing activities that facilitate weed introduction



and spread, poor soil conditions, unnatural plant community composition, and continued degradation of resources by continued and/or increased public access to sensitive areas.

Page 70 - Land Use and Transportation; Travel And Access: Alternative C identifies “minor adverse impacts on travel from visitors using lower standard roads.” Alternative D carries this same potential yet it is not identified there.

Page 70 - Land Use and Transportation; Livestock Grazing: It states that Alternative D would involve the largest acreage identified for restoration. This may not be true if the acreage passively restored by Pristine Zone designation is considered in Alternative C.

Page 71 - Special Designation Areas: Under Alternatives C and D, it is stated that livestock impacts “could be moderate in some local areas where livestock concentrate”. This statement is inaccurate. The DEIS identifies Laidlaw Park as being an area where grazing standards are not being met (DEIS Page 120). This conveys more than a “moderate impact” and if monitoring is being done correctly, the failure to meet standards is indicative of the whole allotment and not just “where livestock concentrate”.

Page 73 - Visitor Experience; Recreation and Public Safety; All Alternatives: It is unclear how ongoing livestock operations can result in “long-term negligible to minor beneficial effects”. The document does not describe how livestock grazing can be beneficial to recreation and public safety, it merely states it. We recommend the final document provide the information to support this statement.

Page 120 - Affected environment; Livestock Grazing: It is stated that grazing preference is not expected to change because most allotments are attaining or making progress toward uniform achievement. Table 16 indicates otherwise. Standards and guidelines have been applied to 14 of the 23 allotments. Table 16 indicates that standards were not met for 5 out of 13 allotments or, one out of three allotments is not meeting standards. In addition, the allotments that are not meeting standards (376,000 acres) contain 40,000 more acres than those meeting standards (336,000 acres). The Service recommends that the final document address whether the allotments not meeting standards were in areas important for sage grouse, pygmy rabbits, and neo-tropical migrants. We also recommend that, if grazing preference is not expected to change, the rationale for this decision be described.

Page 167 - Affected Environment; Impacts from Alternative C: It is stated that a decrease in access would occur under this alternative. We do not believe that this is entirely accurate. There would be a decrease in *motorized access*, but access from foot or pack animal would remain the same. Legal access to a given area is not being altered, only the means by which an area can be accessed.

Page 249 – Consultation with the U.S. Fish and Wildlife Service. We recommend that the last sentence of the paragraph be changed to read: “Informal consultation with USFWS...” Informal consultation is an optional process that includes all discussions, etc., between the agencies to assist the Federal action agency in determining whether formal consultation is required.

Page 337 - Appendix G Proposed Laidlaw Park ACEC: The document states that ACEC designation may not be necessary because “current management, regulation, and law provide sufficient protection for the values identified.” Given that Laidlaw Park is unique and valuable because of its plant community, the Service recommends it be provided the protection given by ACEC designation and the prioritization of resource conservation it affords.

Summary

In summary, the Service believes that Alternative C meets the goals of the Monument more than the Preferred Alternative (D). This may be due, in part, to the abstract nature in which the restoration and road management goals for Alternative C and D were presented. Clarification of where, how, and to what extent restoration will be conducted, which roads are to be reclassified, how access would be controlled on roads intended only for administrative use, how restoration activities will be mitigated in terms of vegetative disturbance, road maintenance, invasive weed management, and displaced livestock distribution, may lead us to re-evaluate the utility of Alternative D as the Preferred Alternative.

The Service recommends that Laidlaw Park be designated as an ACEC. We also recommend that the preferred alternative provide BLM the tools that would allow for a change in livestock management, if necessary, to retain the qualities of Laidlaw Park that make it worthy of protection.

Finally, we recommend that a more thorough analysis of the impacts to sage grouse and pygmy rabbits be conducted in order to more accurately reflect potential impacts to these species.

Thank you for the opportunity to provide comments on this DEIS. If we can be of further assistance or if you have any questions, please feel free to contact Debbie Mignogno of the Service’s Eastern Idaho Field Office, 4425 Burley Drive, Suite A, Chubbuck, Idaho 83202 (208 237-6975x31).

cc: Craters of the Moon NP (Attn: J. Apel)
FWS, Boise, ID (Attn: M. Robertson)
IDFG, Jerome, ID
EPA, Boise





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

July 29, 2004

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AUG 02 2004
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Reply To
Attn Of: ECO-088

Ref: 02-030-NPS

Rick VanderVoet, Monument Manager
Craters of the Moon National Monument Planning Team
BLM Shoshone Field Office
400 West F Street
Shoshone, ID 83352

James Morris, CRMO Superintendent
National Park Service
PO Box 29
Arco, ID 83213

Dear Mr. VanderVoet and Mr. Morris:

The U.S. Environmental Protection Agency (EPA) has completed its review of the draft Environmental Impact Statement (DEIS) for the **Craters of the Moon National Monument and Preserve Draft Management Plan** (CEQ No. 040188) in accordance with our authorities and responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

The DEIS evaluates four (4) alternatives regarding the co-management of the national monument for the next 15 to 20 years by both the Bureau of Land Management (BLM) and the National Park Service (NPS). The monument includes areas for recreational opportunities, visitor information, natural and cultural resources, and grazing. The alternatives evaluated are Alternative A is the no action alternative; Alternative B emphasizes on a broad array of visitor experiences; Alternative C emphasizes the monument's primitive character, and Alternative D emphasizes protection and restoration of physical and biological resources and processes. The DEIS identifies Alternative D as the agencies' Preferred Alternative.

EPA supports the revision of current management to encourage desired conditions in the monument and better collaboration among agencies and partnerships outside the monument in order to facilitate education for visitors. Consequently, EPA has rated the Preferred Alternative LO – Lack of Objections. This rating and a summary of our comments will be published in the *Federal Register*. A summary of the rating system we used in our evaluation of the draft EIS is enclosed.

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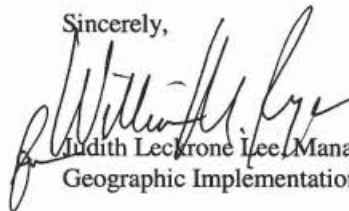
The document provides sufficient information regarding issues of concern brought up during scoping and clear figures related to each alternative. However, EPA recommends including additional information in the EIS regarding cultural resources and water resources impacts.

The EIS discusses cultural resources and the consultation that occurred and that long term cultural resource impacts would not occur. EPA recommends further discussing specific issues that were identified by tribes in the consultation process and how any issues would be addressed. This will assist the public in understanding how the consultation process affects management decisions for not only Section 106 of the National Historic Preservation Act identified resources, but also tribal resources related to traditional sites, sacred sites, travel routes, and traditional hunting.

The monument area is inherently dry and the limited supply of water and water quality are a critical element for sustainability of wildlife and other natural resources, which is a component of the carrying capacity (a character used by the NPS for ensuring no excessive damage to the environment) of the area as discussed in the EIS. The EIS discusses that Alternative D "could accommodate more livestock water developments" and that if these are developed than water quality in playas could be impacted. EPA supports long term water quality and protection of playas and all other water resources in the area. EPA recommends further discussing what measures will be taken to ensure that grazing will not adversely impact water resources, how this will be monitored, and how management direction will be adapted.

If you would like to discuss these issues, please contact me at (206) 553-6911 or Lynne McWhorter of my staff at (206) 553-0205. Thank you for the opportunity to provide comments.

Sincerely,


Judith Leckrone, Manager
Geographic Implementation Unit

cc: [illegible]
b: [illegible]

Enclosure



U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action*

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Environmental Impact of the Action

LO - - Lack of Objections

The Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC - - Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO - - Environmental Objections

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU - - Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 - - Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 - - Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 - - Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.



United States Department of the Interior

U.S. GEOLOGICAL SURVEY
Reston, Virginia 20192

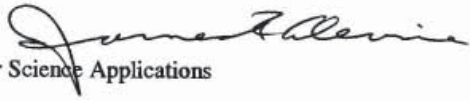
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Reply Refer To:
Mail Stop 423

JUN 3 2004

MEMORANDUM

To: Craters of the Moon National Monument Planning Team
Bureau of Land Management
Shoshone, Idaho

From: James F. Devine 
Senior Advisor for Science Applications

Subject: Review of Draft Management Plan Environmental Impact Statement for
the Craters of the Moon National Monument and Preserve

As requested by your correspondence of May 11, 2004, the U.S. Geological Survey (USGS) has reviewed the subject Draft Environmental Impact Statement (DEIS) and offers the following comments.

SPECIFIC COMMENTS:

Page 172, Chapter 4 Environmental Consequences, Section Water Resources, Section Impacts from Alternative A, Section Analysis, second column, second full paragraph, second sentence:

This document states that because of the short seasonal periods during which standing water is present in playas, the impacts of livestock use -- contamination with fecal coliform and nutrients from manure deposits -- are negated by the eventual disappearance of surface water. Disappearance of water does not negate the problem, because although the water may not be present year-round, nutrient sources (deposited feces) could remain until the following wet season allows them to remobilize. The USGS recommends the statement be modified to remove the word "negated."

Thank you for the opportunity to review and comment on this DEIS.

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JUN 08 2004
SHOSHONE F.O.



JOHN A. "BERT" STEVENSON
DISTRICT 26-A
MINIDOKA & JEROME COUNTIES

HOME ADDRESS
1099 NORTH 400 WEST
RUPERT, IDAHO 83350
HOME (208) 532-4524
BUSINESS (208) 532-4105
EMAIL: berts@safelink.net



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COMMITTEES

CHAIRMAN
RESOURCES & CONSERVATION

AGRICULTURAL AFFAIRS

STATE AFFAIRS

House of Representatives State of Idaho

May 21, 2004

Craters of the Moon Planning Team
Shoshone BLM Field Office
400 West "F" St.
Shoshone, Idaho 83352

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MAY 24 2004
SHOSHONE F.O.

Gentlemen:

When Secretary of the Interior Babbitt held hearings in Rupert he assured us that the Arco-Minidoka route would be a component of the Monument/Preserve.

After reviewing your draft plan, it would appear to be important that the Alternative (D) should include parts of options in Alternative (B).

The entire Arco-Minidoka road as a "passage" route and Carey-Kimama as a "passage" route are important to the people wanting to go through the Monument/Preserve and to have that as an alternative to reaching the National Park Service Visitor Center.

I farm next to the Carey-Kimama road, and I am amazed at the number of vehicles using the road for recreation, hunting and maintaining grazing allotments. It is not unusual to help people retrieve their vehicles from this road.

The public policy has been made that this would be a Monument/Preserve to be used by the public. In order for this to be accomplished, it is imperative that people have adequately maintained roads. People's expectations are that they can use this public land and that requires maintained roads.

I appreciate your consideration of these important issues as you continue to develop the Management Plan.

Thank You.

Sincerely,

John A. Stevenson
Rep. John A. "Bert" Stevenson



DIRK KEMPTHORNE
governor

Dean Sangrey
interim director

IDAHO PARK AND
RECREATION BOARD

Steve Klatt
region one

Randal F. Rice
region two

Ernest J. Lombard
region three

Latham Williams
region four

Jean S. McDevitt
region five

Douglas A. Hancey
region six

IDAHO DEPARTMENT OF
PARKS AND RECREATION

p.o. box 83720
boise, idaho 83720-0065

(208) 334-4199

fax (208) 334-3741

tdd 1-800-377-3529

street address
5657 Warm Springs Avenue

July 26, 2004

Craters of the Moon National Monument Planning Team
Shoshone Field Office, BLM
400 West F Street
Shoshone, ID 83352-1522

RE: Craters Draft Management Plan/EIS

Dear Mr. Morris and Mr. Vander Voet:

We reviewed the Craters of the Moon National Monument and Preserve Draft Management Plan and Environmental Impact Statement. The Idaho Department of Parks and Recreation has participated throughout the planning process and we look forward to working with both agencies on implementation of applicable portions of the plan.

The draft plan identifies Alternative D as the preferred alternative. This alternative would emphasize aggressive restoration of the sagebrush steppe community, including noxious weed control and fire management. It also emphasizes commercial service and off-site visitor opportunities.

The Monument is a relatively unknown place for many Idaho citizens and visitors. With Idaho's rapidly growing population and growing participation rates in outdoor recreation, it will only be a matter of time before the Monument becomes more well known. Any action alternative needs to be responsive to visitor's needs and demands. We believe that Alternative D can be responsive to those needs and demands.

We had the opportunity to review the internal draft this past winter. We greatly appreciate the opportunity and would like to say that the planning team did an excellent job of addressing our concerns and comments.

We offer the following comments to improve the final management plan and environmental impact statement.

In the Introduction on Page 3, the plan states that Craters of the Moon National Monument was the first **national park site** in Idaho. According to BLM Land Status records approximately 37,130 acres of Yellowstone National Park is in Idaho. We recommend that the sentence be rewritten to "Craters of the Moon National Monument, the first **national monument** in Idaho, was established on May 2, 1924."

We were pleased to see in Chapter 2, Page 31; one of the Management Actions utilizes the Idaho State Comprehensive Outdoor Recreation and Tourism Plan and the Idaho Outdoor Recreation Demand Assessment. We are in the process of updating the plan and expect to have a final copy available by December 2005.

In Chapter 2, Page 32, another Management Action states that an intergovernmental coordinating group would be considered to ensure consistency



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of this plan with other state and local plans. Section 202 (f) and Section 309 (e) of the Federal Lands Policy Management Act (FLPMA) provides that Federal, State, and local governments and the public be given adequate public notice and opportunity to comment on the formulation of standards and criteria for, and to participate in, the preparation and execution of plans and programs for the management of public lands. The establishment of such a group would help with this requirement.

In Alternative E, in Chapter 2, Page 30, one of the management actions states, "Selected Class D roads in the Primitive and Pristine zones could be converted to trails or closed for resource protection." Table 5 identifies that 167 miles of these roads are within primitive and pristine zones. The pristine zone concept is inconsistent with roads in these areas, so 9 miles of roads within the pristine zone can be either closed or converted to non-motorized trails.

The public should clearly understand the inconsistency between pristine areas and roads in the final plan. If a primitive road in pristine area needs to remain on the system because of management access or public access, then the area surrounding the road should be reclassified to primitive status to resolve the inconsistency.

In Chapter 4, Page 151 the draft covers the Lost River Off-Highway Vehicle Management Demonstration Project. The draft states "IDPR is seeking exemptions from licensing and insurance requirements for off-highway vehicle (OHV) travel on county roads and for crossing US 93." We are not seeking an exemption from insurance requirements under this proposal. Idaho Code 49-426 allows counties and highway district to exempt certain roads from the license plate requirements. It does not allow those counties to exempt roads from insurance requirements. The sentence needs to be reworded to read "IDPR is seeking an exemption from licensing requirements for off-highway (OHV) travel on county roads and for crossing US 93."

In conclusion, we believe that the planning team addressed our concerns with the previous internal draft. The team has done a great job in providing a reading draft document. We look forward to working with the BLM and NPS on implementation of this plan in the future. If you have any questions about our comments, contact Jeff Cook, Outdoor Recreation Analyst at (208) 334-4180 ext. 230.

Sincerely,



Rick Just, Coordinator
Outdoor Recreation Data Center



STATE OF IDAHO

DEPARTMENT OF AGRICULTURE DIVISION OF ANIMAL INDUSTRIES

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AUG 02 2004

SHOSHONE F.O. July 30, 2004

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DIRK KEMPTHORNE
Governor
PATRICK A. TAKASUGI
Director

2270 Old Penitentiary Rd.
P.O. Box 7249
Boise, Idaho 83707
(208) 332-8540

Craters of the Moon National Monument Planning Team
Rick Vanderdoet
BLM Shoshone Field Office
400 West F Street
Shoshone, Idaho 83352-1522

Dear Mr. Vanderdoet:

The Idaho Department of Agriculture (ISDA) appreciates the opportunity to review and comment on the Craters of the Moon National Monument and Preserve, Draft Management Plan/Environmental Impact Statement (Draft EIS/plan). The planning team (the team) has obviously put much time and effort into developing a plan that will comply with the intent of the Presidential Proclamation to preserve the wonders of the monument area, while providing for continued use and enjoyment of the resources. The majority of the comments provided on the Draft EIS are directed at the preferred alternative (Alternative D). While this alternative is a compromise between the recreation and the preservation emphasis alternatives, we would like to point out a few items that may strengthen the overall content of the plan.

First, ISDA would like to commend the planning team on the efforts made to continue resource protection, while providing for continued livestock use throughout the majority of the area. As stated in the proclamation, "The establishment of this monument is subject to valid existing rights." and that, "Laws, regulations, and policies followed by the Bureau of Land Management in issuing and administering grazing permits or leases on all lands under its jurisdiction shall continue to apply with regard to the lands in the monument administered by the Bureau of Land Management." The number of grazing permits and active AUMs has remained in tact in the area managed by the Bureau of Land Management (BLM). While this is critical to the continued viability of the livestock operations that depend on these areas for a portion of the yearlong forage requirements, it is just as critical that the permittees be able to access these areas for administrative purposes. Areas key to the success of rangeland grazing operations include water sources, salt and mineral distribution sites, and other facilities used throughout the grazing season. Access to these areas must be included as an administrative term of the grazing permit.

ISDA appreciates the planning teams recognition of the importance of noxious weed management. Noxious weeds are one of the most devastating forces occurring on our rangelands today. The aggressive stance the team is taking on noxious weed control will pay dividends well into the future. Invasive annual plants are also a very destructive force found in this area. The planning team has also done a good job at recognizing the need to focus efforts to control the spread of these species throughout the monument. We encourage the team and subsequent managers to maintain a full spectrum of treatment options including prescriptive grazing as a part of the ongoing fight against these invaders.

Constant monitoring is key to determining the success of any of our efforts. When planning monitoring activities, managers need to ensure that goals and objectives are clearly defined. The team needs to look at those desired future conditions identified throughout the Draft EIS and establish specific conditions that are required to assess the "vital signs" of ecosystem health (pg. 24). The team must ensure the most appropriate scientifically sound methods are designated for use in the Monument.

"Serving consumers and agriculture by safeguarding the public, plants, animals and the environment through education and regulation"



July 30, 2004

The Draft EIS emphasizes the need to maintain soil protection to prevent "accelerated and unnatural erosion". While native species are important for a number of ecological reasons, including soil protection, many non-native perennial species are just as effective and much easier to establish in the face of annual grass competition in xeric soil types. ISDA strongly suggests that the team place a heavier emphasis on utilizing those plants that will afford the most soil stability and place less emphasis on whether the plants are native or non-native.

The aggressive restoration goals identified in the vegetation portion of Alternative D (pg 49) are very good goals, but these restoration activities should be closely coordinated with the affected permittees. One of the most environmentally sensitive methods of vegetation manipulation is the use of closely controlled prescriptive grazing. ISDA strongly suggests the team reword restrictive language in the document and maintain prescriptive grazing as a tool to achieve desired future conditions.

While livestock may impact resources, the impacts portrayed in the "Unavoidable Adverse Impacts" section (pg239) unnecessarily concentrate on those associated with livestock. The "damage, theft, vandalism, foot-traffic, and other caused disturbances" associated with geologic resources also impact many other facets of the monument that are currently only attributed to livestock. Cultural resources are a prime example of finite resources damaged more extensively by direct human activity (theft or vandalism) than by livestock. ISDA strongly suggests that the team make a complete assessment of current and potential impacts to these resources by direct human activity in addition to those caused by livestock.

While it is true that removal of exposed lava flows will not appreciably reduce the available forage base for grazing permits, care should be taken to ensure that only those lands of truly exposed lava are removed from the grazing permits. ISDA supports the recommended adjustments to the boundary and jurisdictional changes purposed within Appendix C.

The nominated Laidlaw Park ACEC, as shown in Appendix G, is not appropriate. The BLM has Standards for Rangeland Health and Guidelines for Livestock Management that provide for the attainment of rangeland health while still providing for utilization to benefit the operations of local ranchers. The designation of this area calls for additional protection that is not necessary and would limit the availability of many management tools currently used by resource managers and users.

ISDA thanks you for the opportunity to comment on this important draft environmental impact statement. By working together we can make this a better plan for the direction of our natural resources and the administration of the National Monument.

Sincerely,



John Chatburn
Deputy Administrator
Division of Animal Industries
ISDA