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Steve Guerber
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Fax: (208) 334-2626

June 14, 2002

Mr. John Apel
Craters of the Moon National Monument
P.O. Box 29
Arco, Idaho 83213

RE: Craters of the Moon National Monument Management Plan

Dear Mr. Apel:

Thank you for notifying us of the National Park Service's proposed development of a comprehensive management plan for Craters of the Moon National Monument. We look forward to working with you through this process.

We are pleased to see that one of the desire future conditions is to educate the public about the Monument's diverse history and prehistory and its important cultural resources. This will be a good opportunity to expand on the Monument's existing and excellent interpretation about human adaptation over time to Craters' unique landscape. To meet this goal, we encourage NPS to step up efforts to complete a record search of known historic properties within the Monument and to conduct reconnaissance surveys to identify historic properties not yet recorded. This information will also be necessary to determine what protection should be offered for cultural resource sites.

We appreciate your stewardship of our State's important historic places. 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

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June 8, 2002

Dirk Kempthorne/Governor
Steven M. Huffaker/Director

Craters of the Moon National Monument
Planning Team
Bureau of Land Management
P.O. Box 2-B
400 West F Street
Shoshone, Idaho 83352-1522

Re: Draft Goals and Issues for Management Planning – Craters of the Moon National Monument

Rick Vander Voet and Jim Morris,

We have reviewed the information provided at the June 6, 2002 public information meeting and presented in your scoping document (Spring/Summer newsletter) for the Management Plan being developed for the Craters of the Moon National Monument. In general, we concur with your broad statements presented in the "Purpose and Significance," "Goals," and "Issues and Concerns" sections. To assist you in further defining issues relevant to fish and wildlife management and recreational use of the area, please consider the following comments:

- The Idaho Department of Fish and Game has management authority over fish and wildlife within the Monument boundary. Although specific information on wildlife populations within the Monument is limited, we do have broad management plans for the game management units encompassing the Craters of the Moon. We request consideration be given to our species management plans and goals for the management units found within the Monument boundaries. These include hunt units 49, 50, 52A, and 68. Species management plans covering this area are available for Mule Deer, Elk, Pronghorn, and Sage Grouse. They can be found on the Idaho Department of Fish and Game website or can be provided by the Magic Valley Regional Office in Jerome.

- Given the lack of site specific wildlife information and its importance in management planning and decision making, we recommend the plan identify wildlife information and monitoring needs within the Monument. We readily offer our expertise and assistance in identifying data gaps and monitoring needed to assess wildlife species abundance, distributions, and trends; particularly in relation to Monument management goals.

- Hunting and trapping and sportsmen access should be considered in management planning as a traditional use of the land. As you are aware, federal legislation is currently being proposed to restore these traditional uses, which were excluded under the Presidential Proclamation expanding the Monument. We fully expect these traditional

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activities will again be allowed and request management direction allow for this recreational use of the land.

- The land included in the Monument expansion is currently a mix of native shrub-steppe habitats and areas altered by post fire rehabilitation efforts. We would like to see a goal included in your management plan that addresses future vegetation management in the Monument. Specifically, we would like to see a commitment by BLM and the National Parks Service to utilize only native plant materials in treatment activities. Additionally, we request management consideration and priority be given to the restoration of areas currently dominated by exotic plants. Fire response priorities should also be designated for the Monument with native shrub communities given the highest level of protection.

- Past grasshopper and cricket infestations have resulted in the use of pesticides on federally owned land within the area covered by the expanded Monument. We recommend management guidelines for insect control are included in your planning document. Specifically, we recommend pesticide use guidelines consider the impact on sagebrush obligate wildlife, such as sage grouse, and the importance of insects in chick and migratory songbird survival.

Thank you for this opportunity to participate in planning for future management at the Craters of the Moon National Monument. We will contact you after the scoping meetings have concluded to discuss information the Department can contribute to the management planning process. Please contact Mike McDonald, Environmental Staff Biologist, in this office if you have any questions or need additional information.

Sincerely,

David Parrish

David Parrish
Magic Valley Regional Supervisor

Cc: IDFG-NRBP
IDFG-D. Pitman
IDFG-B. Saban

IDAHO DEPARTMENT OF LANDS

SOUTH CENTRAL IDAHO AREA OFFICE
329 Washington Street
P.O. Box 149
Gooding, ID 83330
Phone (208) 934-5606 Fax (208) 934-5362

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June 17, 2002

Craters of the Moon Planning Team
Bureau of Land Management
P.O. Box 2-B
400 West F Street
Shoshone, ID 83352-1522

Re: State of Idaho Endowment lands within the Boundary of the Expanded Craters of the Moon National Monument

Planning Team:

Please add the Idaho Department of Lands, P.O. Box 149, Gooding, Idaho 83330 to your mailing list. We did not receive any notice of your current planning activity so we must not be on your list at this time.

You should note that there are seventeen (17) parcels of Idaho Endowment land within the expanded boundary. There is no mention of these lands in Newsletter 1. There are an additional five (5) parcels that border on the boundary of the monument.

Most of the Endowment lands are currently leased for grazing and we encourage the continuance of grazing on these lands. Grazing leases provide income and impact vegetation to reduce wildfire severity and control of weeds.

Existing roads to Endowment lands need to remain open so that the State and its lessees, or successors in interest can access these lands for administration. Additionally, endowment lands are open to the public for hunting. Existing roads will provide the public access to our lands for hunting.

Since management of the Monument likely will not meet the objectives of this department to maximize revenue from Endowment lands, these Endowment lands should be acquired by the federal government through land exchange. There is no mention in your newsletter that you will work towards acquiring all non-federal lands within the monument boundary.

If land exchange cannot be completed then we would seek improved access to Endowment lands so that we might lease them to Outfitters and Guides for use such as a base camp, or similar uses, in order to generate additional income for our beneficiaries.

It is important that the federal government work diligently to acquire the Endowment lands within the Monument boundary to avoid conflicts with the Department of Lands Mission and the Monuments need to manage for public purposes. Department staff are willing to meet with your planning team to develop a land exchange proposal.

Sincerely,

Bryce Taylor

BRYCE TAYLOR
Area Supervisor

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street address
5657 warm springs avenue

September 23, 2002

Rick Vander Voet, Monument Manager
Shoshone Field Office, BLM
P.O. Box 2-B
Shoshone, ID 83352

RE: Craters of the Moon National Monument Management Plan

Dear Rick:

The Idaho Department of Parks and Recreation obtained a copy of the Craters of the Moon National Monument Management Plan Preliminary Planning Criteria. We obtained this copy by checking your website and fortunately checked it before the comment deadline closed. We would like to receive all planning documents by mail or e-mail well before the comment period closes.

National Monument designation creates more restrictive planning criteria than a normal resource management plan. The enabling proclamation in itself, presents constraints on plan development.

What surprised us the most about the preliminary planning criteria was the lack of BLM information to guide recreation planning. We believe the monument plan should incorporate the principles and guidance laid out by the BLM's National OHV Strategic Action Plan and the draft National Mountain Bicycling Strategic Action Plan.

A key component of this plan will be the development of a transportation management component. Monument designation and an increasing local population will likely increase visitation to the area. A transportation management component should minimize visitor ecological impacts and still provide for adequate visitor access (motorized and non-motorized).

The travel analysis in the plan needs to distinguish between different forms of off-highway vehicle (OHV) recreation. Off-highway motorcycles, ATV's, and passenger four-wheel drives have different impacts to the environment. The most obvious difference is the trail that they can travel on. An off-highway motorcycle can travel on a trail with a tread width as narrow as 12 inches with no adverse effects to the trail tread, while an ATV requires at least a 48 inch tread width to avoid adverse impacts to the trail tread.

The plan will also have to provide adequate access for both motorized and non-motorized recreation. Travel planning can be a difficult issue. The broad variety of recreation uses competing for the same amount of ground can lead to conflict. The monument should also try to create more non-motorized opportunities without closing current motorized opportunities.

This can be as simple as creating different zones for travel. The lava flows limit mechanized travel. They provide for wilderness or a wilderness like experience. Other areas, such as Little Park are more open and prone to route proliferation. The key to reducing route proliferation is properly identifying and signing routes combined with visitor education and enforcement. Another key is to provide adequate recreation access.

The Idaho Department of Parks and Recreation appreciates the opportunity to comment on the planning criteria. We look forward to working with the BLM and the NPS in the planning process. If you have any questions about our comments, contact Jeff Cook, Trails Program Coordinator at (208) 334-4180 ext. 230.

Sincerely,

Rick Collignon, Director
Idaho Parks and Recreation

JC g:\wp\nepa\craters.doc

DIRK KEMPTHORNE
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director

Rick Cummins, Administrator
division of management services

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March 7, 2003

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Craters of the Moon National Monument Planning Team
Shoshone Field Office, BLM
P.O. Box 2-B
Shoshone, ID 83352-1522

RE: Monument Plan Preliminary Alternatives

Dear Rick and Jim:

The Idaho Department of Parks and Recreation attended the Craters Monument Plan workshop on February 22, 2003 in Rupert. The Craters of the Moon National Monument is an unknown treasure to many Idahoans, and potential visitors. In the future, as the population grows, the monument will likely become better known. The management plan should focus on managing visitor opportunities and traditional ranching opportunities as well as protecting physical resources.

The preliminary alternatives cover a wide range of activities and actions. Much of the public sentiment has been to manage the area as it is currently being managed. We believe that all alternatives should give monument managers enough flexibility to manage the monument resources and opportunities effectively.

One component of Alternative B would resource inventory and monitor target areas most vulnerable to vandalism, theft, or indirect impact from increased levels of recreation use. National Monument designation requires the NPS and BLM to protect areas from vandalism, theft, or indirect recreation use impacts. We encourage the planners to incorporate this component into the entire range of action alternatives.

Draft alternative C increases the amount and extent of biological weed treatments and reduces chemical treatments compared to the existing situation. Generally, biological treatments are most successful in controlling the spread of noxious weeds while chemical treatments are more successful in eliminating noxious weeds. The EIS should examine the effectiveness of biological verses chemical treatments across the range of alternatives.

Draft alternative C also increases the amount of land located in the pristine zone over the other alternatives. While attending the meeting, we learned that some areas proposed for the pristine zone, might not be suitable to being listed as pristine. These areas have numerous range improvements, power line corridor and roads. Draft alternative C might need to have some of the pristine zone unit boundaries relocated.

A key component of draft alternative D is to promote partnerships at existing facilities such as Idaho visitor centers, state parks and Chamber of Commerce visitor centers. Partnerships will be key to the implementation of any selected alternative. We encourage the planning staff to put this component in the entire range of selected alternatives.

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. Both your agencies have done a good job of providing the public an opportunity to comment on the formulation of this management plan. The Lower Snake River District implemented an intergovernmental coordinating group for the development of the Bruneau and Snake River Birds Of Prey Resource Management Plans. The planning staff should consider the formulation of a similar group to insure consistency of this plan with other state and local plans. If such a group is formed, the Idaho Department of Parks and Recreation would like to participate.

We recently completed the 2002 State Comprehensive Outdoor Recreation and Tourism Plan (SCORTP). We encourage you to review it in your planning process. As a component of the SCORTP plan, the Idaho Outdoor Recreation Demand Assessment provides good information on Idahoans' ranking of important outdoor recreation issues and participation in outdoor recreation activities. The 2002 SCORP can be downloaded online at http://www.idahoparks.org/SCORTP/.

We appreciate the opportunity to attend the draft alternative meeting, and provide comment on these draft alternatives. We look forward to working with the BLM and NPS on the development, and possibly implementation of this plan. Please let us know if we can help in any way. If you have any questions about our comments, contact Jeff Cook, Outdoor Recreation Analyst at (208) 334-4180 ext. 230.

Sincerely,

Rick Collignon, Director
Idaho Department of Parks and Recreation

THE BOARD OF BLAINE COUNTY COMMISSIONERS

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Dennis Wright, Chairman * Sarah Michael, Vice Chair * Mary Ann Mix, Commissioner

March 13,2003

Craters of the Moon National Monument
Planning Team
BLM, Shoshone Field Office
P O Box 2-B
Shoshone, ID 83352

RE: County Government Comment on Alternative Concepts

Our first comments refer to your Purpose statements, which were well crafted, and we hope are utilized as standards to decide where you go from this point forward. In our view, it is very important to not forget to 'maintain the wilderness character of the Craters, protect the kipukas, and continue the historic and traditional human relationships that have existed for generations'! We believe the traditional relationships like hunting and grazing can be accommodated within managed parameters. Most probably the biggest threat to kipukas would come from vehicles and grazing, both of which could be mitigated by management constraints. By definition, any historical and traditional connection to a proposed use ought to be measured by a time factor. Certainly a use established two or three years ago wouldn't fit these standards.

Secondly, the Draft Goals, if utilized by the team in balancing your efforts, should always focus on the compatibility of competing uses. It isn't sensible to build conflict into the plan at any stage. In addition, team members hopefully will not lose sight of the second goal, which mentions the 'remarkable opportunities for solitude'. If certain noisy uses are allowed, they should be in segregated areas so as not to violate this goal.

While all of the alternatives pose their unique problems, our Board would at this time, support the approximate ideas represented by A and C. We have no problems with accessing the King's Bowl area on the south but would prefer to have it an in-and-out experience, as opposed to the circular pattern in Draft D and we definitely oppose the improved road connection from Arco to Minidoka that is proposed through Blaine County by alternative B. We realize there is pressure from the two

counties to our south to enhance their economies through major travel from Arco to Rupert. However, we think this idea is misguided and wouldn't amount to near the economic benefit that the proponents do. Arco especially, has experience from visitors going through their town and hasn't realized measurable improvements to their area from the approximately 195,000 annual visitors to the present visitor center. Without a doubt, an improved road would bring more traffic, demand more maintenance dollars, and put many more people at peril who may chose to leave the road and not understand the harsh environment they are dealing with. Blaine County does not care to accept any more maintenance responsibilities in that area and may consider abandoning the 4 miles we presently maintain on the Arco-Minidoka road. Road issues on the Carey-Kamama Rd. will have to be addressed also from a maintenance viewpoint. Once again, increased traffic will necessitate increased grading and dust control. These increases to our marginal costs will have to be borne by someone other than Blaine County.

The increased passage zone north of Highway 93 near the visitor's center in Alternative A in an improvement we could support. It would tend to keep visitors near the best road and out of trouble in other areas.

Overall, we urge the planning team to not forget the real purpose behind every Monument creation. That is to protect the area's natural features and vitality from degradation and to preserve it as a legacy to pass on to future generations. Certainly you want to encourage visitors and enjoyment from the general public while at the same time, minimizing the effect of that visitation on the fragile features of the area. Recreational pursuits by certain types of ORV's do not, in our opinion, fit the purpose statements outlined earlier. It should be recognized that there are thousands of acres of BLM lands contiguous to the monument boundaries that are already accessible to these uses. The monument itself should not necessarily accommodate the exact same uses as other desert lands under BLM jurisdiction. Otherwise one needs to ask the question: Why was it set apart as a monument in the first place? Please don't forget, this doesn't prevent people from visiting; it only limits the mode of transportation.

This Board looks forward to more input as your team continues to refine the management plan. We also recognize the enormity of your task and wish you much success as you strive to reach your ultimate objective. Thank you for the opportunity to respond at this time.

Sincerely,

Dennis Wright
Chairman

Sarah Michael
Vice-Chair

Mary Ann Mix
Commissioner

CITY OF CAREY, IDAHO
PO Box 6, Carey, Idaho 83320
208-823-4045

Mayor-Richard Baird: Council President-Robert Simpson: Council- Daniel Parke, Randy Patterson, Craig Adamson

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March 24, 2003

Mr. Jim Morris, Superintendent
Craters of the Moon National Monument

Mr. Rick Vander Voet
Bureau of Land Management

Dear Jim and Rick,

I want to first let you know how much I appreciate the role that both of you have related to planning for the future of the Craters of the Moon National Monument. The right people at the right time certainly comes to mind. Thank you again for taking the time to give the presentation to the City Council.

In the last regular City Council meeting, the presentation was briefly discussed again. The Council unanimously feels that now is the appropriate time for individual comment and that it would not be appropriate for them to try and develop a City opinion without a significant public process. They therefore instructed me to thank both of you for the presentation and let you know that we want to be a full partner completely through this process and that a more appropriate time will present itself for City comment in the future.

Thank you again and if you have questions, please contact me at 208-788-9003.

Richard Baird, Mayor

CITY OF CAREY, IDAHO
PO Box 6, Carey, Idaho 83320
208-823-4045

Mayor-Richard Baird: Council President-Robert Simpson: Council- Daniel Parke, Randy Patterson, Craig Adamson

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June 25, 2002

Craters of the Moon National Monument Planning Team
Bureau of Land Management – Shoshone Field Office
P.O. Box 2B
Shoshone, ID 83352

To Whom It May Concern:

On behalf of the Carey City Council, I have been authorized to provide the following comments.

The residents of the City of Carey were not part of the decision making process to expand the Monument. It was a decision that was made primarily at the national level. The Monument will certainly impact the Carey Valley sometime in the future. The extent of impact cannot be determined or even forecasted because appropriate plans and studies related to the monument have not been completed. The City Council, therefore, will insist that local residents not shoulder impact to this community or to the Carey Valley alone. Federal funds should be made available on a timely basis to mitigate impacts that are a direct or indirect result of the new Monument Management Plan. In fact, mitigation measures should be a part of the plan itself.

Carey Valley residents are concerned that the future will bring access restrictions. The area should remain accessible to as many people, by as many different methods as possible. The plan should recognize statistics relating to the baby boomer generation and ensure that our most vulnerable and experienced can enjoy the monument as they could before the expansion.

The area should remain multi-use. Grazing, hunting, four wheeling and as many other activities as possible, should be addressed and made a part of the plan. The BLM was able to manage the area for years and ensure that it essentially remained unchanged. The BLM was continuously under pressure from many permittees to grant more grazing rights, but their management was working. It can remain multi-use and remain unchanged.

The community believes that development inside the Monument is not appropriate. Facilities like campgrounds and other services should be provided outside of the Monument and should not be allowed to change what the expansion designation sought to protect. Roads should be maintained, not improved.

In this era of electronic marvels, the form letter comment sheet or idea has been perfected. Please insure that appropriate weight is placed on particular comments. Organized groups have the ability to overwhelm the comment process with comments that mean nothing more than the push of a button.

The City of Carey desires to work with the BLM and National Park Service to ensure that the Plan not only protects, but also provides as much opportunity to as many as possible. We are also proud to be considered the western gate/entry to the Monument.

Please place the City of Carey on the mailing list. We would like ten hard copies of the Draft Management Plan/Environmental Impact Statement.

Thank you for the opportunity to comment and to participate in the process.

Sincerely,

Richard R. Baird
Mayor, City of Carey

RESOLUTION
Craters of the Moon National Monument and Preserve

Bureau of Land Management
Upper Snake River District Resource Advisory Council
September 11, 2003

The Upper Snake River District Resource Advisory Council has been involved in the process of developing management strategies for the recent expansion of the Craters of the Moon National Monument and Preserve. Since the Executive Proclamation #7373 was announced, the Upper Snake River RAC has received briefings and updates on the expansion process and the development of new management plans. The USRDRAC set up a subcommittee to offer help to the Bureau of Land Management and the National Park Service as they planned for the future of the monument. The subcommittee sent representatives to attend various interdisciplinary team meetings of the agencies involved. RAC members also attended public scoping meetings, open houses and alternative concepts workshops. The Upper Snake River RAC was represented at the Choosing By Advantage workshop where the various alternatives were evaluated and voted upon.

BE IT RESOLVED the Upper Snake River Resource Advisory Council supports the efforts of the Bureau of Land Management and the National Park Service thus far in the management planning process of Craters of the Moon. It was observed that the agencies use a well thought-out process to sort through natural resource information and public comment. The process seemed to be a logical method to gather public comment and create management alternatives. The selection of a preferred alternative was done in a thoughtful and reasonable way.

The USRDRAC lends its support to the preferred alternative, Alternative D, and encourages the agencies to continue developing management strategies that enhance the landscape from the perspective of Alternative D.

The RAC appreciates the opportunity to provide input, and is committed to continue to help at any stage of development and implementation of management plans.

Signed: