The SHOSHONE-BANNOCK TRIBES

FORT HALL INDIAN RESERVATION
PHONE (208) 478-3700
FAX # (208) 237-0797

FORT HALL BUSINESS COUNCIL
P.O. BOX 306
FORT HALL, IDAHO 83203

SHOSHONE OFFICE
OCT 20 2003
RECEIVED

October 16, 2003

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: SHOSHONE-BANNOCK TRIBES COMMENTS TO THE CRATERS OF THE MOON NATIONAL MOMUMENT & PRESERVE – RESOURCE MANAGEMENT PLAN

The Shoshone-Bannock Tribes would like to thank the National Park Service and the Bureau of Land Management for seeking Tribal participation in the development of this Management Plan. The Shoshone-Bannock Tribes (Tribes) technical staff has reviewed the available information and submits the following comments.

The BLM and NPS staff came to Fort Hall to meet on August 27, 2003 with the Fort Hall Business Council, and that may be considered as a part of the consultation process, as an information meeting. Prior to that, the BLM and NPS staff coordinated with the Tribal resource staff, and the Tribes urge the agencies to continue to coordinate with the staff, throughout the planning process.

The Craters of the Moon area is of particular importance to the Tribes, as it has important historical usage and continues to retain cultural values, as legends and other Tribal histories have included the Craters area. Any potentially adverse impacts that this management plan would have upon those traditional values needs to be prevented.

Out of the four alternatives presented, the technical staff supports the DRAFT Alternative C, which emphasizes retention and enhancement of the Monuments primitive character with minimal visitor facilities or services and less management action to influence resource conditions,

with minor changes. These suggestions are to ensure adequate roads, (two tracks) to allow Tribal member access for exercise of treaty rights.

The Tribes request to be actively involved and participate in the development of the implementation plan for individual projects that will result from this management plan.

General Comments: The Shoshone-Bannock Tribes are not members of the general public; the Tribes are a sovereign nation, with its own governing system and cannot be equated with local state, municipalities or county governments. The 1868 Fort Bridger Treaty reserves the right to continue traditional activities on all unoccupied federal lands.

Understanding that the BLM is under a Multi-use Mandate, the Tribes remind and emphasize that the BLM first has a federal trust responsibility to the Tribes to manage lands under their jurisdiction in a manner to preserve and protect those trust resources, on behalf of the Tribes.

Please include in your list of required laws and statutes the federal agencies must follow, the 1868 Fort Bridger Treaty, as well as the official government-to-government consultation requirements to the Shoshone-Bannock Tribes. Also include in the document, a statement stating the federal agencies federal trust responsibility to the Tribes to manage and protect Indian Trust Assets/Treaty Resources, and that these federal agencies will work to ensure all proposed projects will be developed and analyzed with this responsibility paramount.

Specific Comments: Please analyze the impacts that this proposed management plan would have upon the Tribes reserved treaty rights. Please review and revise this NEPA document to address the concerns raised in these comments. Again, the Tribes need to be involved to review and ensure that the EIS adequately addresses the Tribal comments.

Specific treaty resources include the following resources, cultural resources, wildlife, plants and vegetation, water resources and the traditional cultural activities.

The Tribal staff agrees with the overall recommendation and goal to retain the character and preserve the unique qualities of this area, but another goal/objective would be to ensure that Tribal interests and rights are protected, enhanced and managed to the benefit of the Tribes.

Tribal hunting and gathering rights needs to be addressed to ensure access for Tribal members on public lands. To exercise treaty rights reserved by the 1868 Treaty, no state regulations or permits are necessary by Tribal members. The Tribes Fish & Game Department regulate and enforce the 1975 Tribal Fish & Game Code, for all off reservation hunting and fishing activities. Please expressly state that the federal agencies recognize that the Tribes regulate their own Tribal members for hunting, and do not require Tribal members to secure state hunting permits to hunting within the National Preserve lands or within the jurisdiction of the BLM.

Big game wildlife that is important for Tribal hunting include elk, deer, antelope and an occasional moose. Small game includes the sharp tailed grouse, sage hens, rabbits, rockchucks, squirrels, partridges, and other associated small game. Access to hunting areas is also vital to the Tribal members to allow them exercise their treaty rights, but also without opening up additional roads to tourists.

Due to the additional concerns to protect the delicate and fragile environment, it is the recommendation of the Tribal staff to discourage the development of new roads.

The federal agencies are requesting specific site information to help identify constraints in specific locations of resources important to the Tribes, etc., however, it is the Tribes position that the *entire area* contains cultural significance to the Tribes. Site-specific recommendations are difficult to make without extensive visits to these areas by our Tribal members and Tribal resource staff. If the BLM can offer financial assistance, via Assistance Agreements, to provide the funding to the Tribes, then more detailed participation can be possible from the Tribes side. The Tribes expect the agencies to manage to protect, and when possible enhance *all* of these resources.

Additional information and educational signs and displays to educate the public about the historical use of this area by the Tribes are necessary. Please develop these informational displays in conjunction with the Tribes. The documented archeological sites are very important to the Tribes, with expectation that they will be respected, preserved, protected from excessive public recreational use.

Additionally, as a part of the management plan, please encourage Tribal member permanent and temporary employment, such as for fire management activities, seasonal employment and summer youth employment.

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 Yvette Tuell at 208-238-3290 or email her at ytuell@shoshonebannocktribes.com.

Sincerely,

Fred Auck

Fred Auck, Chairman
Fort Hall Business Council
Shoshone-Bannock Tribes

CC: Chad Colter, Shoshone-Bannock Tribes
Louise Dixey, Shoshone-Bannock Tribes
Yvette Tuell, Shoshone-Bannock Tribes
LaRae Buckskin, Shoshone-Bannock Tribes
Land Use Policy Commission (3)
File

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

SHOSHONE OFFICE
MAY 2 8 2002
RECEIVED

May 24, 2002

James A. Morris
Superintendent,
Craters of the Moon National Monument
National Park Service
P.O. Box 29
Arco, Idaho 83213

Rick Vander Voet
Monument Manager,
Craters of the Moon National Monument
Bureau Of Land Management
P.O. Box 2-B
Shoshone, Idaho 83352

Subject: Craters of the Moon National Monument Land Use Management Plan and Environmental Impact Statement Scoping Document
File # 1035.0150 FWS # 1-4-02-SP-0126

Dear Mr. Morris and Mr. Vander Voet:

The U.S. Fish and Wildlife Service (Service) is providing you with a list of endangered, threatened, proposed, and/or candidate species which may be present in the area of Craters of the Moon National Monument (Monument) located in Blaine, Butte, Lincoln, Minidoka, and Power Counties, Idaho. The list fulfills requirements for a Species List under Section 7(c) of the Endangered Species Act of 1973 (Act), as amended. If the project decision is not made within 180 days of this letter, regulations require that you request an updated list. Please refer to the FWS number above in all correspondence and reports.

Section 7 of the Act requires Federal agencies to assure that their actions are not likely to jeopardize the continued existence of endangered or threatened species. Federal funding, permitting, or land use management decisions are considered to be Federal actions subject to Section 7. If the proposed action may affect a listed species, consultation with the Service is required. Formal consultation must be initiated for any project that is likely to adversely affect a threatened or endangered species. If a project involves a major construction activity and may affect listed species, Federal agencies are required to prepare a Biological Assessment (BA). If a proposed species is likely to be jeopardized by a Federal action, regulations require a conference between the Federal agency and the Service.

The Service understands that the National Park Service and Bureau of Land Management has proposed to develop a Management Plan for the Monument. This plan is intended to (1) provide general direction and basic management philosophy; (2) identify resource, management, and visitor use strategies and actions; (3) identify Monument infrastructure requirements, functions, and locations; (4) satisfy statutory and policy requirements; and (5) identify funding and staffing requirements.

Threatened and Endangered Species

Threatened and endangered species that may occur in the proposed project area (enclosure) include: Canada lynx (*Lynx canadensis*), gray wolf (*Canis lupus*), bald eagle (*Haliaeetus leucocephalus*), Ute ladies'- tresses (*Spiranthes diluvialis*), bull trout (*Salvelinus confluentus*), Bliss Rapids snail (*Taylorconcha serpenticola*), Utah valvata snail (*Valvata utahensis*), and Snake River physa snail (*Physa natricina*). However, for your information, we also have provided you with a list of Species of Special Concern and ask that you consider them, and their habitats, during project planning and review; although they do not have legal status under the Act.

Based on our knowledge of the Monument area, sufficient habitat for Canada lynx or bull trout is not available. The proposed project area does not occur in lynx habitat (i.e., not in a Lynx Analysis Unit) and there are no linkage areas in the project area. Furthermore, there is not adequate surface water present in the Monument area for bull trout survival. However, any available information documenting Canada lynx or bull trout presence in the project area should be noted in the project BA.

The gray wolf is listed as nonessential experimental within the central Idaho area. However, if gray wolf denning sites or rendevous areas are found near or within the project area, the Service asks that project activities be planned to minimize disturbance to wolf activities.

A bald eagle breeding territory is located approximately 15 air miles east of Monument at Carey Lake. The project BA should document the most recent bald eagle survey information regarding the above breeding territory and address effects of proposed project activities on these and any newly established breeding territories that may occur in the project area. The Guidelines for Management of Breeding Areas (Bald Eagle Management Plan for Greater Yellowstone, 1996 Final Draft) should guide the timing of any project activities with regard to potential disturbance of Nest Site Management Zones (NSMZ) from human activity, and to bald eagle foraging habitat outside NSMZs. It also should be noted that transient, wintering bald eagles may occur anywhere throughout Blaine, Butte, Minidoka, and Power counties, including the project area.

Ute ladies'-tresses have the potential to occur in wetland and riparian areas including springs, wet meadows, and river meanders. The plant is known to occur at sites ranging from 1,500 to 7,000 feet in elevation. This species generally flowers from mid-July through September, and can be identified definitively only at that time. The orchid can remain dormant for several years; therefore, we suggest surveys for the orchid be scheduled for sequential years. The species may

be adversely affected by modification of riparian and wetland habitats associated with livestock grazing, vegetation removal, excavation, construction for residential or commercial purposes, stream channelization, hydroelectric development and operation, and actions that alter hydrology.

The Bliss Rapids snail, Utah valvata snail, and Snake River physa snail are part of the native mollusc fauna of the middle Snake River which characteristically require cold, fastwater or lotic habitats. The Bliss Rapids snail occurs on stable, cobble-boulder substratum only in flowing waters in unimpounded stream reaches. This species does not burrow in sediments and normally avoids surfaces with attached plants. Populations (or colonies) of the Bliss Rapids snail occur in areas associated with spring influences or rapids edge environments and tend to flank shorelines. They are found at varying depths if dissolved oxygen and temperature requirements persist. The Utah valvata snail lives in deep pools adjacent to rapids or in perennial flowing waters associated with large spring complexes. This species avoids areas with heavy currents or rapids, and prefers well-oxygenated areas of non-reducing calcareous mud or mud-sand substrate among beds of submergent aquatic vegetation. The Snake River physa snail occurs on the undersides of gravel to boulder substratum in swift current. Living specimens have been found on boulders in the deepest accessible part of Snake River at the margins of rapids. Currently, the occurrence of snails at the Monument is unknown; therefore the project BA should document any available survey information addressing the presence or absence of snails or snail habitat in or near the project area. If survey information is not available, we recommend surveys be conducted prior to submission of the BA.

Our office would welcome the opportunity to assist in developing a consultation agreement and to work as part of your planning team. If you need any further information, please contact Sandi Arena of this office at (208) 237-6975 x 34. Thank you for your continued interest in endangered species conservation.

Sincerely,

Deb Mignogno
Supervisor, Eastern Idaho Sub-Office

Enclosure

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Southeast Idaho Refuge Complex
4425 Burley Drive, Suite A
Chubbuck, Idaho 83202
Telephone: 208/237-6615 Fax: 208/237-8213

12 March 2003

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

Dear Planning Team,

We appreciate the opportunity to comment on the National Monument alternatives. We do not wish to endorse any particular alternative, but would like to voice a couple of concerns.

If you are considering land trades to even up boundaries or to take care of inholdings The U. S. Fish and Wildlife Service would be interested in partnering in those transactions. There are three parcels of State lands on the north shore of Lake Walcott that Minidoka National Wildlife Refuge would like to acquire to give the refuge control of the entire north shore. This would allow better wildlife management and opportunities to improve recreational access in the Gifford Springs Area. Since we do not have excess lands to trade we will require the assistance of other Federal agencies. The Department of Lands has expressed interest in disposing of these three tracts to consolidate their holding elsewhere.

Secondly, if the decision is made to add a visitor center at the south end of the National Monument, the U. S. Fish and Wildlife Service would like to investigate the possibility of joint location for visitor and education facilities as well as an office complex in the vicinity of Lake Walcott State Park. The Idaho Department of Parks and Recreation would also likely be interested in collocation.

Our final concern is with weed invasion. Since weed control is a major effort at Minidoka NWR we are sensitive to the potential problems that may occur on the National Monument. We suggest that potential for weed introductions be considered before opening access routes, either by foot of by vehicle into new areas, particulary in Kipukas with pristine natural vegetation.

Sincerely,

Richard Munoz, Project Leader
Southeast Idaho National Wildlife Refuge Complex

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

Reply To
Attn Of: ECO-088

JUL 19 2002

02-030-NPS

Rick VanderVoet, Monument Manager
Bureau of Land Management,(BLM)
Shoshone Field Office
PO Box 2-B
Shoshone, ID 83352

SHOSHONE OFFICE
JUL 29 2002
RECEIVED

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

Dear Mr. VanderVoet and Mr. Morris:

The U.S. Environmental Protection Agency (EPA) has reviewed the Federal Register Notice of Intent (NOI) to prepare an environmental impact statement (EIS) for the proposed **Craters of the Moon National Monument (CRMO), Land Use Plan**. Our review of the NOI was conducted in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

Section 309 specifically directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions. Although our Section 309 and NEPA reviews are independent, we conduct both at the same time. Our review considers not only the impact to the environment, but also the adequacy of the document to meet the requirements of NEPA. To avoid major revisions after the draft EIS is issued, we offer these comments early in the NEPA process to help improve the proposed project and ensure that a good NEPA document is developed. A good EIS should adequately address purpose and need for the proposed activity, set forth the environmental impacts of the proposed project and all its alternatives, and discuss significant issues. Please refer to the attached information, *EPA's Section 309 Review: The Clean Air Act and NEPA,* for further explanation on our EIS review responsibility.

Through the Presidential Proclamation 7373, the CRMO was greatly expanded "to assure protection of the entire Great Rift volcanic zone and associated lava features." The CRMO's basaltic volcanism features are nationally significant. In addition, the CRMO contains undisturbed sage-brush steppe communities within isolated vegetation islands surrounded by lava. These relic vegetation stands, called kipukas, form essential habitat for sensitive species that is often found lacking within the surrounding Snake River Plain.

Bureau of Land Management and the National Park Service are in a unique situation, as co-managers, to manage and protect this national treasure. Our major concerns related to the proposed CRMO, Land Use Plan are:

- The direct, indirect, and cumulative impacts to streams and riparian areas – For example, the proposed project has the potential to alter stream discharge, and degrade riparian areas and water quality.
- Impacts to soil quality – The proposed project has the potential to impact long-term soil productivity (soil quality) through disturbances and changes in organic matter levels.
- Threatened or endangered species – The proposed project may impact federally listed or candidate species and including their habitats.
- Wildlife habitat and habitat connectivity – The proposed project should disclose if or how wildlife habitat or migration corridors might be impacted.
- Recreation and accessibility – The DEIS should disclose management of recreational and accessibility opportunities in the project area.
- Prescribed wildfires – The proposed management plan should disclose potential impacts from prescribed fires in the project area.
- Air Quality – The DEIS should disclose the elements of a smoke management plan for the project area.
- Livestock grazing – Since grazing will continue within the CRMO, the DEIS should elements of sustainable rangeland management and disclose impacts associated with existing and proposed livestock grazing activities within project areas.
- Invasive and noxious weeds – Proposed project should disclose efforts towards restoration of native habitat disrupted by the colonization and establishment of noxious weeds within project area.
- Hunting activities – Since hunting privileges will continue in the Monument, the DEIS should disclose long-term management of target species and their habitat.
- Historic resources, treaty rights, and privileges – Proposed project development may affect historical or traditional cultural places of importance to the area's tribal community.
- Effective public participation – The DEIS should disclose what efforts were initiated to ensure effective public participation.

We appreciate the opportunity to participate early in the scoping process. We are available to discuss issues or answer questions that arise while you develop the draft EIS. Should you have any questions regarding our comments, please contact me at (206) 553-4423 or at connor.tom@epa.gov.

Sincerely,

Tom Connor

Tom Connor, Environmental Specialist

ADDITIONAL ENVIRONMENTAL PROTECTION AGENCY (EPA) DETAILED SCOPING COMMENTS ON THE FIRE, FUELS, AND VEGETATION MANAGEMENT PLAN

Purpose and Need

We suggest writing a short, yet direct, Purpose and Need statement that clearly states what the driving factor is for the project. The Council on Environmental Quality (CEQ), through its regulation (§ 1502.13), provides assistance in proposing that the Purpose and Need statement should disclose the underlying purpose of this management plan (MP). Make it about one to two sentences long. Then follow it with more in-depth discussion. Avoid putting in the Purpose and Need Statement other objectives you want to accomplish. Instead, discuss these other objectives later in the Purpose and Need section. For example, the Purpose and Need for this cooperative project between BLM and NPS may be to manage and restore public lands within the Craters of the Moon National Monument (CRMO). If both federal project leads intend to also improve livestock forage and habitat, improve recreational opportunities, and preserve relic sage-brush steppe habitat in the CRMO, then it would be more accurate to characterize these as other proposed activities and not include them in the Purpose and Need statement.

Description of Impacts

We strongly encourage that the Draft Environmental Impact Statement (DEIS) quantify values where possible when predicting impacts to the environment and discuss the significance of those values in terms of how the environment will be affected. Describing impacts as low, medium, or high, for example, is not very meaningful. Ideally impacts should be quantified and compared against a standard or threshold. For example, water quality of an affected stream could be compared to the water quality standards.

Water Quality

<u>303(d) Listed Waters</u>

One of EPA's primary concerns is to prevent the degradation of water quality. Section 303(d) of the Clean Water Act (CWA) requires the state of Idaho identify those waterbodies which are not meeting or not likely to meet State water quality standards. The EIS must disclose which waterbodies may be impacted by the project, the nature of the potential impacts, and the specific pollutants likely to impact those waters. It should also report those water bodies potentially affected by the project that are listed on the State's current 303(d) list and whether Idaho Department of Environmental Quality (DEQ) has developed a TMDL for the waterbodies and the pollutants of concern. If a water restoration plan (Total Maximum Daily Load) has not been established which applies to a stream on the 303(d) list, then in the interim until one is established, it must be demonstrated that there will be

no net degradation of water quality. This should be demonstrated by doing a watershed analysis. Also, the DEIS must identify other waterbodies [not just those that are listed under Section 303(d)] likely to be impacted by the project, the nature of the potential impacts, and the specific pollutants likely to impact those waters.

Best Management Practices (BMPs)

Predicting water quality impacts from nonpoint source activities and the efficacy of BMPs in preventing those impacts is an imprecise science. Challenges include predicting water quality degradation from a proposed activity, designing appropriate BMPs, and making the BMPs work in the field. Therefore, the effectiveness of the BMP should be verified. One way is to use monitoring information on BMPs employed elsewhere under similar circumstances. Finally, water quality should be monitored to determine the adequacy of BMPs and for future remediation work if BMPs are found later to be inadequate.

Source Water Assessment and Protection (SWAP)

Public drinking water supplies and/or their source areas are often found on lands under federal management. Activities such as timber harvesting, road building, weed/insect control, grazing, and recreation may impact the water quality of waters that serve as the sources of drinking water for downstream communities. The SWAP provisions of the 1996 amendments to the Safe Drinking Water Act (SDWA) impose certain obligations on federal land management agencies. Under the SWAP requirements, federal land management agencies that manage land that serves as source water areas will need to participate with the states and local communities in the delineation of the source water area, the inventory of all potential sources of contamination, and in the protection of these source water areas.

If you should discover that there are public drinking water supplies in the project area, then you should disclose this information and how you intend to protect those source waters under each alternative. In any case, you should discuss the SWAP provisions of the SDWA as outlined above, what you are doing to meet your obligations under SWAP, and whether there are any issues with SWAP from this project.

Vegetation Management

Unfortunately, noxious weeds have established themselves nationally across thousands of acres of BLM land. Currently, BLM is participating with state and local governments in establishing Cooperative Weed Management Areas. These Areas will utilize local, state and federal resources to inventory and treat weed infestations on public and private lands. While the briefing package for the proposed project does mention mechanical and chemical methods towards weed management, EPA strongly encourages that the DEIS incorporates proven strategies of an integrated weed management program.

EPA endorses the concept of an integrated weed management program for several reasons. Important among these reasons are:

1) Uncertainties. Despite the substantial amount of scientific information that EPA reviews prior to registering a pesticide, it is virtually impossible to identify all conceivable risks and to address all the uncertainties of pesticide use. Therefore, pesticide use should be approached cautiously.

2) Overuse of pesticide can cause problems. Aside from the potential for toxic effects to people, overuse of pesticides may cause problems such as: a) lethal effects to beneficial organisms; b) resurgence of pest populations, and c) contamination of the environment.

3) Economics. An integrated weed management program can result in lower costs than conventional pest management. Some of these poorly accounted for costs are: potential long term health effects, effects of pesticides on non-target animals and plants, and the health effects to someone who may be particularly sensitive to a pesticide or pesticides, and any other effects that are not now understood, but will be uncovered over time. Even though these costs are not traditionally considered in economics, they are costs, and should not be ignored.

We recommend that the DEIS disclose if BLM is pursuing management strategies beyond chemical and mechanical; and if they are, then what these strategies might be. We also recommend that the approach of an integrated weed management program be adaptive. This means that as new information becomes available, it can be incorporated into corrective decisions to revise vegetation management plans.

Herbicides

Herbicide use affects ecosystem processes and, specifically, biological processes. Unintended environmental impacts do occur. The EIS should address the sublethal effects of herbicides, surfactant and emulsifiers on ESA-listed species. The EIS should explore the impacts from non-specific or broad-based herbicides that kill many species of plants and can devastate ecological chains, adversely affecting both terrestrial and aquatic species directly (plant) and indirectly (animal). While the focus is generally on water pathways and drift during chemical application, wind erosion of soils can transport herbicides offsite and have unintended effects, especially on dry, highly erosive BLM lands in the West. In Idaho, a recent application of the herbicide OUST® on BLM lands was unintentionally carried via windblown sediment to nearby agricultural lands, and ended up damaging literally tens of millions of dollars worth of crops. Similarly, the EIS should consider that dust can also be deposited in streams, lakes, and wetlands.

Livestock Management

The EIS should evaluate and disclose historic rangeland conditions on a broad, landscape scale and identify avenues to incorporate flexibility in grazing plans and allotments that permit both BLM managers and public-lands ranchers to account for special circumstances such as drought and reduce grazing use when necessary.

> 43 CFR 4110.3-3, "When the authorized officer determines that the soil, vegetation, or other resources on the public lands require immediate protection because of conditions such as drought, fire, flood, insect infestation, or when continued grazing use poses an imminent likelihood of significant resource damage, after consultation with, or a reasonable attempt to consult with, affected permittees or lessees, the interested public, and the State having lands or responsible for managing resources within the area, the authorized officer shall close allotments or portions of allotments to grazing by any kind of livestock or modify authorized grazing use."

The EIS should evaluate whether riparian protection, habitat conservation for ESA-listed species and habitat management plans for sensitive species are being implemented as committed to in the MP and other planning and/or decision documents. More specifically, the EIS should evaluate ecological restoration needs and develop strategies to achieve restoration goals. It should also consider including roadless and wilderness designations as part of the overall restoration strategy.

The DEIS should examine the tradeoffs associated with various management options for livestock grazing regarding wildlife habitat. This information should be considered when developing the MP or other NEPA decisions. It should include information and guidance which informs BLM managers and other stakeholders about the effects of livestock forage removal and competition with native wildlife. The DEIS should evaluate the extent and risks associated with continued grazing on listed, threatened, endangered or sensitive species and on rare and sensitive species and ecosystems found on BLM lands.

The DEIS should consider an appropriate range of alternatives to achieve multiple-use goals for lands that are desired for other economic and human uses. For example, the EIS should consider a No Grazing Alternative on allotments to evaluate the social, economic, and environmental impacts that may occur if grazing ceases on a given allotment or other land holdings that are desirable for other uses or that are seriously degraded.

The DEIS should consider all impacts in the decision criteria, including land health, riparian protection, wildlife habitat and recreation, with equal consideration to grazing. The decision criteria should be based on sound science and economics rather than solely on sustaining a single-use objective.

Noxious weeds

The short and long-term impact of noxious weeds on public lands is affecting both the quality of native habitat and the breadth of management activities. Due to the growth of noxious weeds' impacts, the DEIS needs to disclose if and how the Integrated Vegetation Management program will control and manage noxious weed infestations due to a variety of vectors (i.e., livestock grazing, off-road vehicle activities, and road construction and maintenance) within the Planning Area. For example, studies have shown that livestock contribute to noxious weed invasion (Belsky et al., 1999; and Belsky and Gelgard, 2000) by a variety of avenues.

Accessibility and Recreation

Roads

Roads are the major source of sediment to streams and interrupt the subsurface flow of water, particularly where roads cut into steep slopes. In addition, roads and their use contribute to other environmental problems such as habitat fragmentation, wildlife disturbance, the introduction or exacerbation of noxious weeds, and increased fire danger from recreational activities. Please describe the road and culvert situation in the project area in terms of impacts on resources.

Off Road Vehicles (ORV)

Unauthorized ORV use is becoming a concern to many BLM areas since unregulated and unsanctioned ORV disturbance is inconsistent with two Executive Orders (11644 and 11989). Even the CEQ has written a report (1979) stating the environmental damage that ORV's have caused on stream reaches across numerous ecosystems throughout the Unites States. In general, unregulated and unsanctioned motorized vehicle use on public lands is incompatible with soil and aquatic resource management. Therefore within the Planning Area, how will the BLM prevent both short and long-term access of unauthorized motorized traffic, especially by 4-wheel drive vehicles (or ATVs), prevent unrestrained access across fragile rangelands and and other sensitive areas, and effectively enforce access to restricted areas?

Biodiversity

A significant issue in the Pacific Northwest is decreasing biodiversity. To preserve native faunal numbers and abundance, and in recognition of the importance of viable habitat, the Affected Environment section of the DEIS should rate the current quality and potential capacity of habitat, its use by wildlife on and near the project area, and identify known wildlife corridors, migration routes, and areas of seasonal wildlife congregation. The Environmental Consequences sections should evaluate effects on wildlife from habitat removal and alteration; habitat fragmentation caused by roads, land use, and management activities; and increased human access. As a proactive

management plan, maintenance of biodiversity can minimize the need for listing species as threatened or endangered under the Endangered Species Act.

Furthermore, the importance of maintaining project area's biodiversity extends equally to native plant species. Therefore, efforts of disclosure within the DEIS should proceed at the same level of detail as for wildlife habitat. Preservation of floral biodiversity includes active and long-term preservation of the native genetic stock throughout the project area. Preservation of the number and abundance of the indigenous floristic community should extend from the herbaceous layer and shrub species to the tree species.

Prescribed Wildfires and Regional Haze Regulations

Pursuant to the Clean Air Act for the protection of public health and welfare and to preserve, protect, and enhance air quality, we recommend that the DEIS describe the Interim Air Quality Policy on Wildland and Prescribed Fires in relation to the alternatives. The DEIS needs to disclose the smoke management program to be used for this propose project with pertinent discussion on visibility and haze management. In addition, we recommend that the project leaders work closely with the Western Regional Air Partnership.

The State of Idaho has a smoke management plan (or program) (SMP) that is applicable in Idaho. Federal agencies are required to abide by applicable State rules and as such this project should likewise comply with the provisions of the Idaho SMP. In addition, the State is developing a SIP revision addressing the requirements of the Regional Haze Rule (64 FR 35714, July 1, 1999) in a cooperative effort with the WRAP of which the National Park Service (DOI) and Department of Agriculture are members. We recommend that impacts from any prescribed fire be considered in light of potential provisions of an Enhanced Smoke Management Plan as developed by the WRAP.

Having two federal agencies (the Bureau of Land Management and the National Park Service) acting as co-managers, Craters of the Moon National Monument (CRMO) is in a unusual position nationally for both cooperating agencies to manage and preserve public resources. While the BLM will be implementing livestock grazing within the monument, the NPS will be working to preserve the nationally significant basaltic volcanism features and native vegetation communities located within the monument's unique kipuka habitats. To help preserve CRMO's significant basaltic volcanism features, the NPS created a portion of the CRMO as the Craters of the Moon Wilderness Area, designating it as a mandatory federal Class I Area according to the Clean Air Act.. Furthermore, as stated within the NOI, fire and fuel management will continue within CRMO). Thus site management will be an active concern. Even when following a designed smoke management program (SMP), there is the potential for unwanted air quality impacts and these should be described. SMPs rely on the vagaries of the weather. Smoke generated from human activities, like prescribed fires, may not disperse as intended resulting in adverse impacts to nearby designated airsheds or communities. Contingencies for these situations should be considered, including a short-term air quality action level. Nonexceedance of the 24-hour particulate matter

(PM) under national air quality standards does not preclude the need to plan ahead given the potential adverse health impacts to individuals exposed to PM at high concentrations for shorter time periods.

Direct, Indirect, and Cumulative Effects

Please include the indirect and cumulative effects of the project in your analysis. We are as concerned with cumulative effects as we are with direct impacts posed by the individual project. To examine the impact of this project in isolation from other past, present, and reasonably foreseeable future projects in the vicinity would be to ignore what is really happening to the environment in the project area. Resources that could be examined for cumulative effects with this project are water quality, air quality (see previous discussion on Prescribed Fires), mines, old unmaintained or abandoned roads, noxious weeds, biodiversity, and visual (aesthetics) resources.

Agency guidance and information is now available. The handbook, *Considering Cumulative Effects under the National Environmental Policy Act*, issued by the Council on Environmental Quality in January 1997. In summary, the guidance states that in order to address cumulative effects, the EIS should:

- Identify resources that are being cumulatively impacted. If there are none then you need to state this.
- Determine the appropriate geographic (natural ecological boundaries) area and the time period over which the effects will occur
- Look at all past, present, and reasonably foreseeable future actions that contribute to cumulative effects on the resource of concern.
- Describe a benchmark or baseline.
- Include scientifically defensible threshold levels.

Related Regional Planning Actions

We recommend that the DEIS disclose and coordinate with other agency planning efforts that are proposing federal actions within the project area of the recently expanded CRMO. For example, the Natural Resources Conservation Service is currently proposing a project in Blaine County through the issuance of a Notice of Intent for the Little Wood River Irrigation District, Gravity Pressurized Irrigation Delivery System. Of interest, the Irrigation District is proposing returning water to the Little Wood River which could alter seasonal flows within the system. Then at a larger scale, BLM has issued an intent to prepare a Fire, Fuels, and Vegetation Management Plan within the Upper Snake River District of Idaho that includes the lands comprising CRMO.

SHOSHONE OFFICE
JUL 2 6 2002
RECEIVED

Monitoring

The DEIS should establish environmental monitoring protocols that are appropriate and essential, and these same protocols should actively incorporate adaptive management principles. For example, the DEIS should identify additional mechanisms to enforce performance standards based on monitoring data when adverse impacts to rangelands from overstocking results in poor forage quality and ecological damage to fish and wildlife habitat, riparian areas, and fragile upland soils.

Regarding Tribal Consultation and Coordination

The DEIS should include ethnographic research and discuss any inter-governmental coordination on proposed activities within and adjacent to the proposed project area related to rights or historical utilization by the affected Tribe. The project co-leaders should work with the Tribe in a government-to-government relationship whereby the Tribe can work with BLM/NPS as co-managers of the natural resources. Below, we highlight specific concerns.

1) The DEIS should disclose how the lead federal agencies consulted and coordinated with the Tribe in development of the EIS as required by the Executive Order 13175.

Paraphrasing EPA Region 10's Tribal Consultation Process, "Consultation" means the process of seeking, discussing, and considering the views of federally recognized tribal governments at the earliest time in the decision-making process. Consultation generally means more than simply providing information about what the agency is planning to do and allowing comment. Rather, consultation means two-way communication that works toward a consensus reflecting the concerns of the affected federally recognized tribe(s).

2) The DEIS should disclose whether the Tribe considers lands within the project area to be "sacred sites" and provide a prescriptive accommodation plan to resolve concerns, yet not publically disclose actual site locations.

According to Executive Order 13007, federal land managers are to "accommodate access to and ceremonial use of Indian sacred sites." The SDEIS has not disclosed if the MNF has consulted with the Burns Paiute Tribe on this issue.

IDAHO STATE HISTORICAL SOCIETY
PRESERVING OUR HERITAGE
FOUNDED IN 1881

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

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

The Idaho State Historical Society is an Equal Opportunity Employer.

IDAHO FISH & GAME
MAGIC VALLEY REGION
868 East Main Street
P.O. Box 428
Jerome, Idaho 83338-0428

SHOSHONE OFFICE
JUN 1 0 2002
RECEIVED

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

Keeping Idaho's Wildlife Heritage

Equal Opportunity Employer • 208-324-4359 • Fax: 208-324-1160 • Idaho Relay (TDD) Service: 1-800-377-3529 • http://www.state.id.us/fishgame

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

WINSTON WIGGINS - DIRECTOR

SHOSHONE OFFICE
JUN 18 2002
RECEIVED

BOARD OF LAND COMMISSIONERS

DIRK KEMPTHORNE
Governor

PETE T. CENARRUSA
Secretary of State

ALAN G. LANCE
Attorney General

J.D. WILLIAMS
State Controller

MARILYN HOWARD
Sup't of Public Instruction

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

KEEP IDAHO GREEN
PREVENT WILDFIRE

EQUAL OPPORTUNITY EMPLOYER

DIRK KEMPTHORNE
governor

Richard J. Collignon
director

Rick Cummins, Administrator
division of management services

Dean Sangrey, Administrator
division of operations

IDAHO PARK AND RECREATION BOARD

Robert M. Haskenson
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

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
governor

Richard J. Collignon
director

Rick Cummins, Administrator
division of management services

Dean Sangrey, Administrator
division of operations

IDAHO PARK AND RECREATION BOARD

Robert M. Haakenson
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

www.idahoparks.org

March 7, 2003

SHOSHONE OFFICE
MAR 14 2003
RECEIVED

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

206 FIRST AVENUE SOUTH, SUITE 300
HAILEY, IDAHO 83333
PHONE: (208) 788-5500 * FAX: (208) 788-5576
www.co.blaine.id.us

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

SHOSHONE OFFICE
MAR 2 6 2003
RECEIVED

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

JUN 2 5 2002
RECEIVED

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: