

# Chapter 5

## Consultation and Coordination with Others



**Previous page, clockwise, from top left**  
**Blazing star**  
**Devil's Orchard blocks**  
**Blocky a'a**  
**Crater**  
**Big Cinder Butte**

# CHAPTER 5 CONSULTATION AND COORDINATION WITH OTHERS

Public involvement, consultation, and coordination have been integral parts of the planning process leading to this Proposed Plan/Final EIS. A public participation plan and schedule were prepared and implemented during the preparation of the Plan. Methods to inform and involve the public included Federal Register notices, news releases, public meetings and workshops, invited presentations at special interest group meetings, individual meetings with interested publics, newsletter mailings, and website postings.

## **BUREAU OF LAND MANAGEMENT-NATIONAL PARK SERVICE COLLABORATION**

Proclamation 7373, which enlarged the boundaries of the Monument, directed that the “National Park Service and the Bureau of Land Management manage the Monument cooperatively and shall prepare an agreement to share, consistent with applicable laws, whatever resources are necessary to properly manage the Monument.” Further direction from the Secretary of the Interior tasked both agencies to complete a single, combined RMP/GMP and EIS that would meet the legal, regulatory, and policy requirements of both agencies.

In the spirit of this collaboration, a planning team was formed to complete the Management Plan for the enlarged Monument. Staffed by specialists from both the BLM and NPS, this team has worked cooperatively to compile and release the Draft Plan/EIS, analyze public comments, and prepare this Proposed Plan/FEIS.

### **Planning Consistency**

NEPA regulations require the NPS and BLM to try to achieve consistency between management plans and the following:

- a. The officially approved or adopted resource-related plans, policies, and programs of Native American tribes, other federal agencies, state and local governments.
- b. In the absence of officially approved or adopted resource-related plans of Native American tribes, other federal agencies, state and local governments, then the officially approved and adopted resource-related policies and programs of Native American tribes, other federal agencies, state and local governments, and, so long as the guidance and resource management plans are consistent with the policies, programs, and provisions of federal laws and regulations applicable to public lands.

Many other plans were reviewed and considered in the development of the Draft Plan/EIS. This document was made available to Native American tribes, the Governor of Idaho, other federal agencies, state and local governments for comment. The resulting comments were addressed in the Proposed Plan/FEIS. A formal 60-day consistency review by the Governor occurs after the Proposed Plan is published (USDI.BLM.2000).

## **AGENCY CONSULTATION AND COORDINATION**

Title II, Section 202, of the Federal Land Policy and Management Act, provides guidance for coordinating planning efforts with Native American tribes, other federal departments and agencies of the state and local governments. The following sections document the consultation and coordination efforts undertaken by BLM and NPS during the planning process. Appendix I contains copies of letters exchanged during the agency consultation process leading up to preparation of the Draft Plan/EIS. Appendix K contains copies of consultation letters received following release of the Draft Plan/EIS.

In May 2002, the Secretary of the Interior contacted

the Idaho Governor's Office about the planning process for the Craters of the Moon National Monument. In addition, a letter to the Governor, signed by the Director of the BLM and the BLM Idaho State Director, invited the State to become a full cooperating agency in this and other planning efforts scheduled for completion no later than 2007. Letters were also sent to tribal, county, city and local governments with an invitation to partner with the BLM and NPS in a cooperating agency relationship. Although these governments declined to formalize a legal Cooperating Agency (CA) position with the federal government, they were contacted and consulted extensively throughout the planning process.

### **CONSULTATION WITH NATIVE AMERICAN TRIBES**

Formal government to government consultation has been initiated with the Shoshone-Bannock tribes, has been on-going through out the planning process and will be completed when the Plan is final (see Shoshone-Bannock tribal letters in Appendices I and K). In addition to formal consultation, staff to staff meetings have been held through out the planning process to solicit and incorporate the suggestions of tribal staff.

Formal government to government consultation through the Wings and Roots process with the Shoshone-Paiute was initiated late in 2004 pursuant to the creation of the new Twin Falls District within the BLM. Shoshone-Paiute comments and suggestions resulting from the Wings and Roots process have been incorporated into this Proposed Plan/FEIS.

### **CONSULTATION WITH THE STATE HISTORIC PRESERVATION OFFICER AND THE ADVISORY COUNCIL ON HISTORIC PRESERVATION**

The State Historic Preservation Officer (SHPO) must be consulted concerning any resource management proposals that might affect a cultural property listed on or eligible for the National Register of Historic Places. Consultation with SHPO has been ongoing

throughout the planning process. Letters received from SHPO are included in Appendices I and K.

### **CONSULTATION WITH THE U.S. FISH AND WILDLIFE SERVICE**

The Endangered Species Act of 1973 (ESA), as amended, directs every federal agency to ensure that any action it authorizes, funds, or carries out is not likely to jeopardize the existence of any federally-listed species or destroy or adversely modify critical habitat (50 CFR 400). The ESA authorizes federal agencies to enter into early consultation with the U.S. Fish and Wildlife Service (USFWS) to make those determinations. A USFWS biologist is a consultant on the planning team. Informal consultation with USFWS under Section 7b of the ESA was initiated on April 25, 2002. In August 2004, members of the planning team met with USFWS biologists to discuss their comments on the Draft Plan/EIS.

In December 2004, the USFWS concurred that the proposed Craters of the Moon National Monument Land Use Plan may affect, but is not likely to adversely affect gray wolves (*Canis lupus*), a listed species. This determination is documented in the Biological Assessment (BA) of the Effects of the Craters of the Moon National Monument and Preserve Land Use Plan. The BA is available for review in the administrative record at the BLM Shoshone Field Office, Shoshone, Idaho. The USFWS concurrence letter is included in Appendix K of this document.

### **COORDINATION WITH OTHER AGENCIES, ORGANIZATIONS, AND GROUPS**

The FLPMA, Title II, Section 202, provides guidance for coordinating planning efforts with Native American tribes, other federal departments, and agencies of the state and local governments. All tribal governments and local governments, and federal and state agencies with resource management responsibilities or interests in the planning area were informed of the planning effort and



encouraged to participate. Representatives from the U.S. Geologic Survey, USFWS, and the Idaho Department of Fish and Game served as consultants on the planning team. Throughout the planning process, tribal, federal, state and local agencies and other organizations were updated with newsletter mailings and briefings to keep them informed of the status of the planning effort.

Congressional officials were kept updated throughout the planning process at regularly scheduled quarterly meetings. The open houses of June 2002 and alternative workshops held in February 2003 were attended by local Congressional staffers.

### **BLM RESOURCE ADVISORY COUNCIL**

The Idaho Upper Snake River District Resource Advisory Council (RAC) received regular updates on the planning process as the two agencies began working on a joint Management Plan. A subgroup of the RAC was authorized to follow Craters of the Moon issues and bring recommendations back to the full RAC. Members of the subgroup attended public meetings and also participated in meetings of the ID Team. A RAC member participated in the Choosing by Advantages process to recommend a preferred alternative for the Draft Plan/EIS. With the realigning of Idaho BLM Districts in October 2004, a new RAC was created for the Twin Falls District which has carried forward the Craters of the Moon subgroup. The Twin Falls RAC is now receiving briefings on the release of the Proposed Plan/FEIS. A letter of support from the Twin Falls RAC is included in Appendix K.

### **HISTORY OF PUBLIC INVOLVEMENT**

Scoping is the early and open process for determining the scope of issues to be addressed during the planning process. The Notice of Intent (NOI) to jointly prepare a land use plan and the associated EIS for the Craters of the Moon National Monument was published in the Federal Register on April 24, 2002. The NOI initiated the public scoping process

by inviting participation in identifying planning issues and developing planning criteria.

Information about the Monument planning process and opportunities for involvement were posted on websites for the National Park Service ([www.nps.gov/crmo](http://www.nps.gov/crmo)) and the Bureau of Land Management ([www.id.blm.gov/planning/index.htm](http://www.id.blm.gov/planning/index.htm)). Comments were accepted by mail and via e-mail submitted to the project Inbox: [IDCraters\\_Plan@blm.gov](mailto:IDCraters_Plan@blm.gov).

Local and regional newspapers and radio stations throughout the planning area were used to disseminate information on the Management Plan process. Press releases, announcing scoping meetings and inviting the public to provide input, were prepared and distributed on April 24, 2002, to print and broadcast media.

The first of a series of three newsletters was developed to inform the public about the planning process and to solicit input. Approximately 1,500 copies of Newsletter No.1 were distributed in April 2002, with an insert identifying the schedule and locations for six public meetings in Idaho communities during the 60-day scoping period.

Open houses were held in June, 2002, at Arco, Carey, Shoshone, American Falls, Rupert, Fort Hall, Hailey, and Boise. More than 166 people attended the meetings. The following list shows the dates and the number of registered attendees at the open houses:

<b>Scoping Open Houses, June 2002</b>	
<i>Location - Date</i>	<i>Attendance</i>
Arco – 6/04/02	25
Carey – 6/05/02	15
Shoshone – 6/06/02	16
American Falls – 6/11/02	18
Rupert – 6/27/02	27
Fort Hall – 6/13/02	31
Hailey – 6/18/02	22
Boise – 6/19/02	12
<b>TOTAL</b>	<b>166</b>

During the 60-day public scoping period, 169 letters were received with 536 comments. Letters were received from 29 states, with more than 40 percent

coming from Idaho. Of the 169 letters received, 148 came from individuals; 9 from federal, state, and local agencies; and 12 from interest groups. Comments were received from 26 different communities in Idaho, with the majority originating in Boise.

Issues identified through the scoping process were considered in the development and analysis of the planning alternatives. Comments were grouped into the following six categories:

- General (56 comments)
- Development (52 comments)
- Transportation and Access (139 comments)
- Visitor Use and Public Safety (77 comments)
- Authorized Uses (80 comments)
- Natural and Cultural Resources (132 comments)

Newsletter No. 2 was sent out in August 2002 to approximately 850 individuals and organizations on the mailing list. Copies were also made available at BLM and NPS offices and in gateway communities adjacent to the planning area. This newsletter summarized the comments received at the open houses and in writing throughout the scoping period. It also identified the next steps in the planning process.

Throughout the autumn of 2002, the planning team met and analyzed the comments received. The team developed four conceptual alternatives representing different management strategies that could be considered in planning the future of the Monument. These preliminary alternatives were explained in Newsletter No. 3, which was mailed out and made available in January 2003. A postage-paid card was included in the newsletter, with a request that comments be returned by March 14, 2003. The newsletter also gave the dates and locations of three public workshops to be held in February 2003 for people to come and work with the planning team to provide input and assistance on the conceptual alternatives. A total of 86 people attended the three workshops held in Arco, Carey, and Rupert, on February 8, 15 and 22.

More than 160 letters or comment cards were received. The planning team also received a response developed as a Wilderness Society Alert from more than 2,500 individuals. These comments were again compiled into categories and analyzed by the planning team. Team members used information in the comments as they finalized the four alternatives presented in the Draft Plan/EIS.

### **Public Comment on the Draft Plan/EIS**

The Draft Plan/EIS was filed with the U.S. Environmental Protection Agency (EPA) in April 2004. The EPA announced the availability of the Draft Plan/EIS for public review and comment in the Federal Register on April 30, 2004 (Federal Register, Vol. 69, No. 84, Friday, April 30, pp. 23809-23811). This announcement began a 90-day comment period, which ended on July 29, 2004.

The Draft Plan/EIS was sent to agencies, organizations and people who had participated in the planning process and requested a copy. Copies of the Draft Plan/EIS were also available for review online at the website for the NPS ([www.nps.gov/crmo](http://www.nps.gov/crmo)) and the BLM ([www.id.blm.gov/planning/index.htm](http://www.id.blm.gov/planning/index.htm)). Copies of the Draft Plan/EIS were placed in the following Idaho libraries:

- American Falls
- Arco
- Burley
- Carey
- Hailey
- Idaho Falls
- Rupert
- Shoshone
- Twin Falls

Copies of the Draft Plan/EIS could also be requested in either a printed copy or on a compact disc (CD) by contacting the agencies through e-mail, phone, or fax.

Government agencies and the public were invited to submit comments by regular mail, through the



project website, electronic mail (e-mail), facsimile transmission (fax), at public meetings held at four locations in May 2004, or hand delivered to the agency offices. The public comment meetings took place in an “open house” format to provide members of the public an opportunity to interact with resource specialists from the NPS and BLM. Four public comment meetings were held in May 2004:

Public Meetings, May 2004	
<i>Location - Date</i>	<i>Attendance</i>
Arco – 5/4/04	7
American Falls – 5/6/04	9
Rupert – 5/13/04	51
Carey – 5/18/04	8
TOTAL	75

All meetings were open to the public and held in large, single rooms. NPS and BLM resource specialists were present to answer any questions that attendees had on the Draft Plan/EIS or to clarify issues on a particular resource. Poster-sized maps depicting the resources as they would be managed within the different alternatives were arranged around the room to illustrate the management options being considered. Hard copy comments were collected from participants during the public comment meetings, and additional comments on the Draft Plan/EIS were received via mail, fax, or e-mail.

During the 90-day comment period (from April 30 to July 29, 2004), 153 letters were received which contained 570 substantive comments. Substantive comments are those which challenge the accuracy of the analysis, dispute the accuracy of information presented, suggest different viable alternatives, or provide new information that makes a change in the proposal. In other words, they raise, debate, or question a point of fact or policy. Comments in favor or against the proposed action or alternatives or comments that only agree or disagree with policy, while valuable, are not considered substantive.

In addition, 975 form letters were received by e-mail, in response to three alerts, one from The Wilderness Society (611 total), one from the Idaho

Conservation League (354 total) and one from Western Watersheds (10 total).

Letters came from:

1. Twenty-five federal, state, city and county organizations
2. Twelve groups:
  - Gem State Grotto
  - Republicans for Environmental Protection
  - Power County Historical Society
  - Western Watersheds Project
  - Wilderness River Outfitters
  - Great Old Broads for Wilderness
  - Idaho Conservation League
  - The Wilderness Society
  - Idaho Wool Growers
  - Northern Rockies Chapter Sierra Club
  - Lava Lake Land and Livestock
  - Blue Ribbon Coalition
3. 116 individuals

Thirty late form letters were also received, plus one late letter from the National Trust for Historic Preservation.

All correspondence, including representative examples of each form letter and letters received late, were read in their entirety by all members of the ID Team. Both substantive comments and non-substantive comments were reviewed and noted by the ID Team and were considered in developing the Proposed Plan/FEIS. All correspondence is retained in the administrative record.

## COMMENT ANALYSIS

This section presents a synopsis of the comments received on the Draft Plan/EIS. Comments in response to the Draft Plan/EIS were organized and summarized to allow decision-makers and agency specialists to understand the principal issues of concern. The purpose of this analysis

was to objectively identify and display the nature and extent of the public input received on the Draft Plan/EIS. All comments were reviewed. Comments were categorized based on resource areas.

Substantive comments were identified for response, as required by NEPA (40 CFR 1503.4), the BLM NEPA Handbook (H-1790-1), and the NPS Director's Order 12 guidance. Substantive comments are those which challenge the accuracy of the analysis, dispute the accuracy of information presented, suggest different viable alternatives, or provide new information that makes a change in the proposal. In other words, they raise, debate, or question a point of fact or policy.

As mentioned above, 570 substantive comments were received. Each substantive comment was entered into a database. Because of the large number of submittals (letters, e-mails, faxes, comment forms) received during the public comment period, NPS and BLM elected to extract and categorize comments and, as appropriate, group the same or similar comments for response. This approach enabled the agencies to more efficiently consider, individually and collectively, all comments received and to respond to those comments. Substantive comments received are presented in Appendix L, along with specific responses.

The following list highlights key aspects of the approach used for capturing, tracking, and responding to public comments on the Draft Plan/EIS:

- The ID Team read all comment documents and their attachments to identify and extract comments. After comment identification, individual substantive comments were grouped by categories and each was assigned to a specialist in the appropriate discipline to prepare a response. The ID Team reviewed each response to ensure technical and scientific accuracy, clarity, and consistency, and to ensure that the response fully answered the comment. The specialists referred to the original letters, as necessary, to better understand the context surrounding the comments.

- Frequently, more than one commenter submitted identical or similar substantive comments. In such cases, the comments were grouped and a single summary response was prepared for each group. Summarization of comments enabled the BLM and NPS to appropriately respond to the large number of comments received. To the extent practicable, substantive comments were grouped by topic
- BLM and NPS made every effort to be fully responsive to every substantive comment on the Draft Plan/EIS. When the meaning of a comment was not clear, a reasonable attempt was made to interpret the comment and respond based on that interpretation. In such cases, a statement of the interpretation of the comment precedes the response.

## KEY TOPICS

This section provides short summaries of questions raised by those commenting during the public comment period following release of the Draft Plan/EIS. It also provides agency responses to those questions. BLM and NPS identified the topics as “key” based on factors such as:

- The prevalence of a particular topic in the comments received on the DEIS.
- The extent to which a topic concerned fundamental aspects of the Preferred Alternative.
- The extent to which the agencies changed the Proposed Plan/FEIS in response to the question.

### **Topic: Cultural Resources**

***Comments questioned the agencies' plans to inventory only 10% of the Monument under Section 110 of NHPA, if roads are to be upgraded in some alternatives.***

The plan proposes Section 110 inventory on 10% of the Monument (Draft Plan/EIS p. 186). Section 110 of the National Historic Preservation Act refers to non-project related inventory. Section 106 of the National Historic Preservation Act refers to project related inventory, and would always be completed



for federal actions, such as road construction or improvement.

*Several comments questioned how the agencies would fulfill Cultural Resource commitments of Alternative D with such limited staff.*

A discussion of staffing is outside the scope of the Draft Plan/EIS. The draft plan seeks to set the future management direction and goals for the Monument. Once this direction is in place, it will support future managers' requests for additional funding and staff to accomplish these goals.

**Topic: Water Resources**

*Comments stated concerns about grazing effects on water resources, such as playas.*

BLM does not identify playas as riparian areas according to the riparian area definition in the Bureau of Land Management Technical References TR 1737-9 and 11. BLM presently has no data or standards to evaluate playas. Therefore, BLM will use their professional judgment to determine if the standards for rangeland health are being met or we are moving towards meeting them, so that the health of the playas will also be met. The plan does not directly alter grazing management, so the impacts of grazing on water quality are substantially the same for all alternatives.

*Comments requested that the adopted plan include provisions to restore damaged playas.*

Playas would be considered for restoration on a case-by-case basis. The Draft Plan/EIS (p. 29, Management Actions Common to All Alternatives: Livestock Grazing) states, "BLM may remove developments if they are no longer serving a useful purpose or resource objectives warrant their removal. Sites would be restored." In addition, no additional playas would be modified or developed (Draft Plan/EIS p. 26, Management Actions Common to All Alternatives: Water Resources). Language regarding the restoration of playas has been added to the Proposed Plan/FEIS (See Chapter 2 of the Proposed Plan/FEIS, Management Actions Common to All Alternatives: Water Resources).

**Topic: Geological Resources**

*Several comments voiced concerns over the fear of Monument degradation from use and maintenance of roads and from livestock trampling and associated transport of dust and weed seed, which can obscure surfaces of lava formations and alter surface lava features.*

Dust can coat geologic formations until a precipitation event removes it. Dust can also infiltrate into cinders and be deposited in or fill cracks providing more growth medium for plants. In comparison to the aftermath of fire where huge volumes of dust/soil are liberated (eroded and re-deposited elsewhere), these impacts would fall within the range of normal variability and are, therefore, considered to have a negligible impact on geological processes and features. Short of keeping people out entirely, it is not possible to eliminate all anthropogenic-induced degradation.

**Topic: Soils**

*Many comments expressed concern over the effects of disturbed soils transporting herbicide particles.*

Impacts of the proposed alternatives on soil resources are analyzed in Draft Plan/EIS Ch. 4. Effects of herbicides being transported via soil particles would be analyzed in the Integrated Weed Management Plan and project-level vegetation treatment environmental assessments. The Proposed Plan expands the Pristine Zone (as compared to the Draft Alternative D), which will result in reduced access for recreation and livestock developments in certain areas containing sensitive vegetation.

*Some comments indicated the assessment of soils is narrowly constrained, as it assesses no alternative that alters livestock soil disturbance.*

The ID Team felt the level of detail and accuracy of impacts analysis, on the topic of soils, was adequate to make informed decisions at the RMP/GMP level of analysis. The plan does not directly alter grazing management, so the impacts of grazing on soils are substantially the same for all alternatives. Additional information found in the NRCS Soil Survey

will be used for implementation and project-level planning.

***Comments were concerned about adequate data to afford protection of soils and especially biological soils crusts.***

More detailed data on soils found in the NRCS Soil Survey will be used for implementation level planning. Impacts to biological crusts have been analyzed in Chapter 4 and will be further analyzed in site-specific analyses.

**Topic: Vegetation**

***A number of comments emphasized using native species in vegetation restoration and an assessment of the potential impact from future noxious weed infestation.***

BLM and NPS are currently funded and have applied for additional funding to increase native seed specifically for plants found within the Monument. BLM is working with the USFS Rocky Mountain Research Station and private growers to collect and increase native plant seed to be used in large-scaled restoration and post-wildland fire rehabilitation projects; NPS is working with the NRCS to increase native plants specific to the Monument and Preserve. Every effort is being made to utilize the best available science and plant materials in restoration and rehabilitation projects.

In Management Common to All Alternatives, integrated Weed Management principles would be used to detect and eradicate all new infestations of noxious weeds, control existing infestations, and prevent the establishment and spread of weeds within and adjacent to the planning area.

***Concerns were expressed over the limited data provided in the vegetation map and the lack of inventory performed.***

The vegetation map included in the Draft Plan/EIS was produced from satellite imagery and is intended to give a general idea of vegetation distribution within the Monument. Refer to Draft Plan/EIS, p. 86, third paragraph in the right-hand column (Data

from various vegetation studies...) for a discussion of the limitations of the vegetation map. Site-specific, project-level inventories and assessments of impacts to vegetation will be done as needed for individual projects conducted in the future.

***Several comments indicated the acres of lands to be treated under all alternatives appear to be completely arbitrary, and could be changed under any alternative.***

A vegetation inventory and assessment for Laidlaw Park, Little Park, and Paddelford Flat was performed by the BLM in cooperation with The Nature Conservancy in 2002/2003 (Jurs and Sands 2004). A map showing the general areas proposed for various levels of restoration treatment based on this assessment is included in the Proposed Plan. These are rounded estimates based on proposed restoration acreages in the Monument. Field condition assessment and vegetation inventories are included for other parts of the Monument.

***Numerous comments voiced concern over the need to protect and restore sage-steppe habitats and the effects on grazing on these habitats.***

All alternatives contain specific management guidance for wildlife protection, particularly sagebrush steppe obligates. Measures are in place to protect the sagebrush steppe in the Monument (Draft Plan/EIS pp. 25-26, Management Guidance Common to All Alternatives: Vegetation, Including Special Status Species, and Fire Management; and Wildlife, Including Special Status Species). In addition, all allotments must meet or be progressing towards meeting Idaho Standards and Guidelines, including Standard 4 (Native Plant Communities) and Standard 8 (Special Status Species) (Draft Plan/EIS p. 29, Management Guidance Common to All Alternatives: Livestock Grazing). All restoration methods, including passive methods, will be considered for future projects. If monitoring shows that grazing is impacting the restoration process, temporary removal of livestock is a legitimate response. See Draft Plan/EIS p. 25, Management Guidance Common to All Alternatives for



Vegetation, regarding protection and restoration of sagebrush steppe habitats.

***Commenters were concerned that a Fire Management Plan should be part of the comprehensive planning process, which would identify a goal of restoration and maintenance of native vegetation on all lands altered by fire or other disturbance.***

A Fire Management Plan (FMP) would be prepared as part of the implementation of the RMP/GMP (Draft Plan/EIS p. 12, Future Planning Needs, Fire Management Plan). Currently the Monument operates under two FMPs: the 2004 South Central Idaho FMP covers BLM-administered lands and the Preserve; and the 2000 NPS Wildland FMP covers the original Monument. The updated FMP would guide suppression efforts as well as pro-active fuels reduction and restoration treatments, and would detail goals and constraints in specific fire management areas based on resource objectives outlined in the RMP/GMP. In addition, post-fire rehabilitation on BLM-administered lands within the Monument is guided currently by the Shoshone and Burley Field Office Normal Fire Rehabilitation Plans (scheduled for decision Spring of 2005). In all cases, the use of native plants is emphasized and only native species would be used on projects in the Pristine Zone.

**Topic: Access and Transportation**

***Several comments expressed concern that the document did not adequately address transportation planning issues.***

See Chapter One, Future Planning Needs, Transportation Planning. In the Proposed Plan, we describe desired future conditions and management actions for the type of roads and access that is appropriate within each of four management zones. The plan also classifies and inventories the type of roads and trails currently in existence within the Monument. Specific decisions on access and transportation beyond those already defined in the management zone descriptions will be made in the upcoming implementation-level Comprehensive Travel Management Plan. This implementation plan will include a detailed map including all designations for

travel and access within the Monument, including road travel restrictions and road closures to meet resource management objectives, such as protection of special status species habitat, defined in the Proposed Plan.

***Several comments requested more discussion on impacts of road enhancements and building for delivery of administrative and fire services, and expressed concerns about the effects of roads, including fragmentation, access to sensitive areas, and weed dispersal.***

The existing roads support a variety of administrative activities, such as weed control and fire fighting, and have since before the new Monument was designated. These administrative uses may increase for short periods of time, such as during restoration activity, but the long-term impacts of that administrative use are expected to increase only slightly.

The impact assessment is described separately and somewhat differently for different resources. For example, under Geologic Resources, it is recognized that road improvements could have potentially major long-term adverse impacts on resources such as caves due to increased numbers of visitors. However, in selecting the Proposed Plan, the agencies have taken into consideration the expected impacts on resources and the agencies' future management capabilities to deal with such impacts. See Chapter One, Future Planning Needs, Transportation Planning.

***Comments were received regarding increasing/decreasing the Passage Zone in the Monument.***

In response to these comments, the agencies modified the areas contained in the Passage Zone in Alternative D as presented in the Proposed Plan. See Chapter 2, Alternative D Description and Map. In the Proposed Plan, the Passage Zone was reduced in response to public comment and agency review. Creating Passage Zone corridors does not mandate an increase in the number or current standard of roads. See Chapter 2, Description of Management Zones.

***Several comments supported including the entire Arco-Minidoka Road as a “passage” route with improvements.***

While not specifically proposing any improvement to the Arco-Minidoka Road, the agencies, in the Proposed Plan, allow for accommodating improvement to the section of the road within the Monument if, at a future time, the local authorities decide to improve the section of the Arco-Minidoka Road to the north of the Monument boundary.

***Comments expressed concern over the spread of noxious weeds as a result of increased human activity in the Monument related to increased access.***

The Draft Plan/EIS acknowledges that roads, vehicles, humans, and animals are known vectors to the spread of noxious weeds (Draft Plan/EIS p. 92 Ch. 3, Discussion on Noxious and Exotic Species). A full Integrated Weed Management Program addressed a broad range of prevention, education, and control activities to combat noxious weeds (Draft Plan/EIS p. 25, Management Guidelines Common to All Alternatives: Vegetation, Including Special Status Species, and Fire Management).

***Several comments expressed concern over how the document defined roads, indicating that unauthorized or unplanned roads should not be considered “roads” and upgrading would result in increased impacts and OHV use.***

See Draft Plan/EIS p. 112 Chapter 3, Land Use, Transportation/Travel and Access. In response to public comment concerning a lack of clarity in road definitions in the Draft Plan/EIS, road and trail definitions have been refined (See Proposed Plan/FEIS, Chapter 3, Land Use and Transportation/Travel and Access, Road and Trail Definitions). These definitions apply to a road and trail inventory based on best available data at the time of this draft which includes 1:24000 USGS topographic maps, BLM 1:100,000 topographic maps and a 2002 survey of roads, ways and trails in and around existing wilderness study areas.

### **Topic: Recreation**

***Comments requested a monitoring plan to ensure primitive camping and recreation does not damage Monument resources.***

On pp. 12-13 of the Draft Plan/EIS, future planning needs are discussed. Many of the implementation plans described, such as the Wilderness/Wilderness Study Area Plan, the Cave Management Plan, and the Cultural Resources Management Plan, would provide for periodic monitoring and protection of resources from adverse impacts associated with primitive camping and recreation.

**Topic: Special Designations/Management Zones**  
***Many comments suggested designation of North Laidlaw Park as an Area of Critical Environmental Concern.***

The comments did not provide any new information or studies updating the analysis of relevance and importance criteria that would result in a determination that ACEC status is warranted. Management direction to protect the high-quality vegetation resources in North Laidlaw Park, similar to that proposed for the nominated ACEC, was included in Alternative D (See Draft Plan/EIS p. 49, Vegetation, Including Special Status Species, and Fire Management for Alternative D; and p. 340, Appendix G). Analysis of the relevance and importance criteria for establishment of North Laidlaw Park as an ACEC did not indicate that ACEC status is required for protection of the area. The Preferred Alternative was modified to increase the acreage of Pristine Zone and decrease the acreage of Passage Zone in North Laidlaw Park. Management direction under Alternative D (p. 49 of the DEIS) states that the high ecological condition of North Laidlaw Park would be maintained and no new livestock water developments would be allowed.

### **Topic: Wilderness**

***Comments indicated the management plan for the Monument should identify a process by which WSAs not currently recommended for wilderness designation are reevaluated for their wilderness characteristics and suitability for wilderness designation.***



The agencies previously inventoried lands within the current monument boundaries to determine areas with wilderness qualities. These inventories began in the 1960s and continued through the 1980s. These studies resulted in designation of the “43,243” acre Craters of the Moon Wilderness in 1970, and 469,009 acres of WSAs (of which 408,110 acres have been recommended to the U.S. Congress for designation). Existing law and agency policy require management of WSAs to protect the wilderness qualities until Congress determines whether or not to designate the lands as wilderness. The agencies do not believe the land use situation within or adjacent to the Monument warrants re-inventory of lands for wilderness suitability.

***Comments suggested the Wilderness Management actions should include removal of livestock projects that may be impairing wilderness values.***

Under the Proposed Plan/FEIS, managers would continue to have the authority to remove livestock or livestock facilities for resource benefit, if needed. Livestock projects within WSAs are managed according to BLM’s Interim Management Policies for Lands under Wilderness Review, Handbook H8550-1, to prevent impairment of wilderness values.

**Topic: Grazing**

***Comments indicated concern over the role of livestock grazing in loss of sagebrush steppe, and lack of analysis in the Draft Plan/EIS.***

Monument-wide management actions and cumulative impacts of livestock facilities on Monument resources were analyzed and characterized at an appropriate level of intensity for the Draft Plan/EIS (See Draft Plan/EIS Chapter 4, pp. 158-162). Specific, project-level analysis of cumulative impacts will be provided in individual range improvement project Environmental Assessments. Impacts of livestock facilities and developments on natural resources were specifically and cumulatively analyzed at the Monument level.

***Comments requested terminating grazing from certain areas of the Monument and looking at temporary removal of livestock as a management tool to avoid negative impacts to the restoration process.***

If monitoring shows that grazing is impacting the restoration process, temporary removal of livestock is a legitimate response to correct the problem. According to policy requirements, restoration projects always include removal of livestock for a minimum of two growing seasons following treatment to allow for vegetation recovery and establishment of seeded species. Idaho Standards and Guidelines for Rangeland Health guide adjustments in livestock grazing regimes (numbers, seasons of use) in response to problems identified through evaluation and monitoring. The historical impacts of livestock grazing on the sagebrush steppe were discussed in the Draft Plan/EIS (p. 86, Affected Environment: Vegetation, including Special Status Species, and Fire Management).

**Topic: Wildlife**

***Several comments indicated concern that the Monument Management Plan failed to take the actions necessary to protect sagebrush and Sage-grouse ecosystems.***

The Proposed Plan does call for an increase in rehabilitation of areas to functional sagebrush systems as well as the protection of existing healthy and functional habitats. In response to this and similar comments, additional and updated protections for sage-grouse have been incorporated into the Proposed Plan. These can be found in the Wildlife section and Management Actions section of the Proposed Plan/FEIS.

**Topic: Socioeconomics**

***Comments requested further analysis regarding how the Proposed Plan will contribute to the health of local economies as well as positive and negative socioeconomic impacts.***

The NPS and BLM proactively involved local county and community officials in scoping of the

Draft Management Plan and development of the management alternatives analyzed. Through this process, several economic issues were identified and included in the alternatives. These include provisions for locating Monument facilities outside the Monument; opportunities for surrounding “gateway” communities to provide services and facilities to visitors; and opportunities for outfitter, guide operations and concession activities within the Monument, among others. A more thorough analysis of the potential economic and social impacts of the management alternatives has been included in the Proposed Plan/FEIS.

**Topic: General**

***Comments supported the City of Arco as the “Gateway to the Craters of Moon” city.***

The support of communities adjacent to the Craters of the Moon National Monument and Preserve is an important link for visitors to the area. We expect this relationship to become stronger. The agencies do not designate one particular community as the official “Gateway” to the Monument. Ideally, several communities strategically located near the Monument associate in a positive way with the Monument. The agencies intend to work closely with all communities surrounding the Monument.

**Responses to Comments**

As stated earlier, over 570 substantive comments were received during the 90-day public comment period. In order to reduce the cost and volume of this document, only Tribal, agency and other government letters have been reprinted in their entirety. All other substantive comments received have been summarized or have been synthesized into a representative comment capturing the main points of several similar comments. The administrative record contains all original letters received.

Public comments received have been documented, analyzed and considered in decision-making and incorporated into the Proposed Plan/FEIS as appropriate. Comments that presented new data or addressed the adequacy of the document, the alternatives or the analysis were responded to pursu-

ant to NEPA regulations. Comments expressing personal opinion or that had no specific relevance to the adequacy or accuracy of the Draft Plan/EIS were considered in the decision-making process, but not responded to directly.

Consultation and agency letters on the Draft Plan/EIS are included in Appendix K. Appendix L contains substantive comments received and responses to those comments. A number of comments provided valuable suggestions on improving the Draft Plan/EIS. Some comments led to changes reflected in the Proposed Plan/FEIS. Other comments resulted in a response to explain BLM or NPS policy, to refer readers to information in the EIS, to answer technical questions, to further explain technical issues, or to provide clarification.

Appendices K and L, plus all other appendices referenced in this document, are printed after this chapter.

**LIST OF RECIPIENTS**

Shown below is a partial list of the many agencies, organizations, and individuals who expressed interest in the Plan during the planning process. Each of these groups or individuals was sent a copy of the Draft Plan/EIS, or notification of where documents could be viewed on a website.

**Native American Tribes**

- Shoshone-Bannock Tribes
- Shoshone-Paiute Tribes

**Government Agencies and Representatives**

- Environmental Protection Agency, Seattle, Washington
- U.S. Fish and Wildlife Service
- U.S. Geologic Survey
- USDA/APHIS Wildlife Services
- USDA/Forest Service – Sawtooth National Forest
- U.S. Senator Larry Craig



- U.S. Senator Mike Crapo
- U.S. Representative Mike Simpson
- Office of the Governor of Idaho
- Idaho Department of Agriculture
- Idaho Department of Commerce
- Idaho Department of Environmental Quality
- Idaho Department of Fish and Game
- Idaho Department of Lands
- Idaho Parks and Recreation Department
- Idaho Department of Education
- Idaho Fish and Game Commission
- Idaho Geological Survey
- Idaho Migrant Council
- Idaho National Guard
- Idaho State Historical Society
- Idaho State Library
- Blaine, Butte, Lincoln, Minidoka, and Power County Commissioners
- Blaine, Butte, Lincoln, Minidoka, and Power County Planning and Zoning
- Cassia County
- Jerome County
- Mini-Cassia Transportation Committee
- City of Aberdeen
- City of Arco
- City of Burley
- City of Carey
- City of Heyburn
- City of Twin Falls
- City of Jerome
- City of Ketchum
- City of Hailey
- City of Shoshone
- City of Rupert
- City of Minidoka
- Upper Snake River District RAC

- Twin Falls District RAC

### **Businesses, Organizations and Other Groups**

In addition to the specific businesses, interest groups, and other organizations listed below, numerous individuals expressed an interest in the Plan and requested to be notified of the availability of the draft document.

- Audubon Society, Prairie Falcon Chapter
- Blue Ribbon Coalition
- Committee for Idaho's High Desert
- Craters of the Moon Natural History Association
- Flat Top Sheep Company
- Gem State Grotto
- Idaho Cattle Association
- Idaho Cave Survey Grotto
- Idaho Conservation League
- Idaho Environmental Council
- Idaho Native Plant Society, Loasa Chapter
- Idaho Outfitter and Guides Association
- Idaho Snowmobile Association
- Idaho State Historical Society
- Idaho Watershed Project (Western Watershed Project)
- Idaho Wool Growers
- IMBA (International Mountain Biking Association)
- Izaak Walton League
- Lava Lake Land and Livestock
- National Parks and Conservation Association
- National Wildlife Federation
- Sierra Club of Idaho
- Sun Valley-Ketchum Chamber of Commerce
- The Nature Conservancy
- The Wilderness Society of Idaho
- Twin Falls Chamber of Commerce
- Wilderness Watch

## **Distribution of the Proposed Plan/FEIS**

Copies of the Proposed Plan will be sent to those people and organizations who have participated in the planning process and those who indicated interest in the Proposed Plan/FEIS. The mailing list is located in the administrative record of the Shoshone Field Office, BLM.

