

Conversation Contents

TNC Idaho Chapter Comments on Craters of the Moon National Monument and Preserve

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"William S. Whelan" <wwhelan@tnc.org>

From: "William S. Whelan" <wwhelan@tnc.org>
Sent: Mon Jul 10 2017 11:32:15 GMT-0600 (MDT)
To: "Tim Murphy (tmurphy@blm.gov)" <tmurphy@blm.gov>, "Wade Vagais (wade_vagais@nps.gov)" <wade_vagais@nps.gov>
CC: "Peter Ditton (Peter_Ditton@blm.gov)" <Peter_Ditton@blm.gov>, "jshoemaker@blm.gov" <jshoemaker@blm.gov>
Subject: TNC Idaho Chapter Comments on Craters of the Moon National Monument and Preserve
Attachments: image001.gif image002.jpg Craters of the Moon -- Nature Conservancy comments.pdf

TNC-Idaho's comments on the secretarial review of Craters of the Moon National Monument and Preserve are attached for your information. TNC requests that the Secretary confirm Craters NMP's boundaries, agency roles, and management direction. Our key points:

- TNC recognizes the remarkable value of Craters NMP and has worked to conserve adjacent working lands.
- The Craters-Pioneers landscape is nationally known for collaborative conservation, not conflict over the national monument;
- In passing the 2002 Craters legislation, Congress ratified the NPS-administered portion of the Craters and declined to change its overall boundaries.
- The 2007 management plan has provided a practical and enduring framework for managing Craters NMP.
- The current boundaries of the BLM-administered portion of Craters NMP are needed to conserve the Great Rift's unique features and character.

Please feel free to contact me with any questions or comments.

Thank you.

Will

Please consider the environment before printing this email

Will Whelan
Director of Government Relations

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(208) 350-2202 (Phone)
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Boise, ID 83702

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"Murphy, Timothy" <tmurphy@blm.gov>

From: "Murphy, Timothy" <tmurphy@blm.gov>
Sent: Mon Jul 10 2017 12:40:34 GMT-0600 (MDT)
To: Michael Courtney <mcourtney@blm.gov>, Codie Martin <cjmartin@blm.gov>, Holly Crawford <hhampton@blm.gov>
CC: Peter Ditton <pditton@blm.gov>, June Shoemaker <jshoemaker@blm.gov>
Subject: Fwd: TNC Idaho Chapter Comments on Craters of the Moon National Monument and Preserve
Attachments: image001.gif image002.jpg Craters of the Moon -- Nature Conservancy comments.pdf

fyi

----- Forwarded message -----

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Cc: "Peter Ditton (Peter_Ditton@blm.gov)" <Peter_Ditton@blm.gov>, "jshoemaker@blm.gov" <jshoemaker@blm.gov>

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Timothy M Murphy
Bureau of Land Management
Idaho State Director
1387 South Vinnell Way
Boise, Idaho 83713
(o) (208) 373-4001

July 10, 2017

Via Electronic Filing
Regulations.gov – DOI-2017-0002

Randal Bowman
Monument Review, MS-1530
U.S. Department of the Interior
1849 C Street NW
Washington, DC 20240

Re: Craters of the Moon National Monument and Preserve

Dear Mr. Bowman:

Thank you for the opportunity to submit comments on the Craters of the Moon National Monument and Preserve (hereinafter “Craters NMP”) for your consideration during the Secretarial review of national monuments pursuant to Executive Order 13792. Craters NMP was established in 2000 by Presidential Proclamation 7373, which expanded the existing Craters of the Moon National Monument from roughly 54,000 acres to approximately 753,000 acres, including the 738,000 acres of federal land.

The Idaho Chapter of The Nature Conservancy requests that the U.S. Department of the Interior maintain the existing boundaries, agency roles, and management direction of the Craters NMP.

The Nature Conservancy is dedicated to the preservation of lands and waters on which all life depends. The Conservancy is the world’s largest conservation organization, with over one million members, including 5,000 in Idaho. The Idaho Chapter of the Conservancy has over 50 years of experience collaborating with private landowners, and federal, state, local, and tribal governments.

The Conservancy has long recognized the remarkable ecological and geological values of Craters-Pioneers Landscape, which includes Craters NMP and the adjacent Southern Pioneer Mountains. The Conservancy has worked with a wide range of landowners and partners to conserve the wildlife, native sagebrush habitats, private working lands and natural character of this part of Idaho.

The Craters-Pioneers Landscape Is Nationally Known for Collaborative Conservation – Not Conflict over the National Monument.

The Craters NMP and its surrounding area have received national attention for the positive, collaborative work by the local community to conserve the area’s unique values. Much of this

work has been coordinated by the Pioneers Alliance, a collaborative group based in Carey, Idaho. In 2014, the Pioneers Alliance received the Secretary of Agriculture's Honor Award for External Partnerships for its work in the Craters-Pioneers Landscape. The Secretary's statement announcing the award described the Pioneers Alliance as a "unique group of ranchers, community members, conservationists, elected officials and agency employees" who are leading an effort to protect working ranches and sage grouse habitat.¹

Since 2001, the Conservancy has worked with dozens of private ranch owners, public agencies, and the Pioneers Alliance to conserve private working lands near Craters NMP. With our many partners, we helped secure agreements with the owners of 84,000 acres of private ranchlands to ensure that their lands remain available for agricultural uses while sustaining wildlife migration routes and native sagebrush habitat.

The enhanced resource protection provided by Craters NMP supports and complements the Conservancy's efforts to conserve adjacent private working lands.

In 2002, Congress Ratified the National Park Service Portion of Craters NMP and Declined to Adjust the Monument's Boundaries.

In 2002, Congressman Mike Simpson secured passage of legislation that re-designated the 410,000 acres of Craters NMP administered by the National Park Service (NPS) as the "Craters of the Moon National Preserve." Public Law 107-213 directed that the area be managed in accordance with the Presidential Proclamation 7373, the Antiquities Act, and laws generally applicable to the National Park System.² Thus, the legislation effectively ratified the boundaries of the NPS portion of Craters NMP. A key purpose of the bill was to ensure that hunting would continue to be allowed within the NPS-administered lands.

It is revealing that the legislation did not seek to diminish the 753,000-acre Craters National Monument established by the presidential proclamation. When Congress addressed the matter, public concerns focused on hunting, not the existence or boundaries of the expanded Craters NMP.

The 2007 Craters NMP Management Plan Struck a Pragmatic Balance for Managing Craters NMP's Unique Features and Multiple Uses.

The management of Craters NMP has been guided by the management plan adopted by the NPS and Bureau of Land Management (BLM) in 2007. The management plan has proven to be a practical and enduring framework for balancing conservation and human use within Craters. The management plan was developed with extensive public involvement and outreach to the State of Idaho. Idaho Governor Dirk Kempthorne's consistency review letter did not raise broad issues

¹ The USDA's statement on the award is found at: <https://www.usda.gov/media/blog/2014/11/10/national-usda-award-honors-idahos-pioneers-alliance-sage-grouse-conservation>. Information on the Pioneers Alliance is found at: <http://www.pioneersalliance.org/>

² 16 U.S.C. § 698w.

with the monuments boundaries or management but focused instead on the feasibility of upgrading the Arco-Minidoka Road.³

The BLM recently completed a final environmental impact statement (FEIS) on livestock grazing within the BLM-administered portion Craters NMP. The FEIS, issued in May 2017, makes only minor changes in the grazing policies adopted in the 2007 management plan. Grazing will be allowed on 273,000 of the 275,000 acres managed by the BLM.⁴

Craters NMP Boundaries Are Necessary for Conservation of the Area's Unique Features.

Craters NMP is unusual in that is administered by two different agencies. Roughly 475,000 acres of the NMP are managed by the NPS and consist primarily of recent volcanic features such as lava flows and cinder cones. About 275,000 acres are managed by the BLM and include adjacent volcanic features along the Great Rift, kipukas, and sagebrush steppe uplands that immediately surround and connect the NPS-administered lands.

As noted above, Congress ratified the boundaries of the NPS portion of Craters NMP in 2002. This 2002 legislation should remove these lands from the Secretarial review process. That leaves the 275,000 acres administered by the BLM potentially at issue.

The BLM portion of Craters RMP has extraordinary values that are inextricably linked to the recent volcanic features under NPS management. Both portions merit continued protection within the Craters NMP.

The BLM-administered portion of the Craters NMP includes special features that are integral to the Craters volcanic landscape. These include:

- *Portions of the Great Rift.* The Great Rift is the 52-mile long crack in the Earth's crust that produced a series of volcanic eruptions starting 15,000 years ago and ending just 2,100 years ago – recently enough to be within the oral history of the Shoshone people. The BLM lands include the central Great Rift, the part of the rift most likely to experience future eruptions.
- *Three large kipukas to the west of the main lava beds.* Kipukas are areas of higher ground that are entirely surrounded by lava flows. These isolated islands of vegetation are of special scientific interest and are cited as one of the features meriting special management in Presidential Proclamation 7373. The Conservancy has raised funds for and conducted science and restoration projects in these kipukas.
- *Laidlaw Volcano.* The 800-foot high volcano is typical of the shield volcanos that dot the Snake River Plain. Shield volcanoes form when erupting lava is fluid enough to travel long distances across the plain.

³ <https://www.nps.gov/crmo/learn/management/record-of-decision.htm>

⁴ BLM prepared the FEIS in response to a court-ordered remand of the grazing portion of the 2007 management plan resulting from litigation filed by the Western Watersheds Project. The 2007 management plan was not vacated by the district court and has remained in effect. The FEIS is found at: https://eplanning.blm.gov/epl-front-office/projects/nepa/35968/107437/131406/CRMO_FEIS_508.pdf

- *Bear Trap Cave.* The BLM lands provide easy access to part of a major subterranean lava tube system. The tube can be traced a total of fifteen miles westward toward the lava fields.

In addition to these features, the BLM lands are essential to the integrity of Craters NMP because they encompass that area immediately surrounding the irregular outlines of the vast and separated lava fields under NPS administration. Protecting these BLM lands is necessary to ensure consistent recreational access, conservation and coordinated management within the Great Rift area.

For these reasons, the Idaho Chapter of the Nature Conservancy respectfully requests that the Department of the Interior confirm the existing boundaries of Craters NMP and re-commit the Department to the stewardship of this unique and wonderful landscape.

If you have questions or requests for additional information, please contact Will Whelan, Director of Government Relations for the Idaho Chapter at wwhelan@tnc.org or 208-350-2202.

Sincerely,



Toni Hardesty
State Director

cc: Senator Mike Crapo
Senator James E. Risch
Congressman Mike Simpson
Congressman Raul Labrador
Governor C.L. Butch Otter
BLM Idaho State Director Tim Murphy
Craters NMP Superintendent Wade Vagais

July 10, 2017

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Sincerely,

A handwritten signature in blue ink that reads "Toni Hardesty". The signature is fluid and cursive, with the first name "Toni" being more prominent than the last name "Hardesty".

Toni Hardesty
State Director

cc: Senator Mike Crapo
Senator James E. Risch
Congressman Mike Simpson
Congressman Raul Labrador
Governor C.L. Butch Otter
BLM Idaho State Director Tim Murphy
Craters NMP Superintendent Wade Vagais