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Lava Lake COTM comments

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

From: "William S. Whelan" <wwhelan@tnc.org>
Sent: Tue Jul 11 2017 18:05:42 GMT-0600 (MDT)
To: "Peter Ditton (Peter_Ditton@blm.gov)" <Peter_Ditton@blm.gov>
Subject: Lava Lake COTM comments
Attachments: image001.gif image002.jpg Lava Lake Comments on COTM Secretarial Order v02.3 - 2017-07-10.pdf

Per our conversation.

Thanks.

Will

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Lava Lake Land & Livestock, LLC

July 10, 2017

Mr. 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:

Please accept these comments of Lava Lake Land & Livestock, LLC ("Lava Lake") for the record in the Department of the Interior's review of national monuments pursuant to Executive Order No. 13792 (April 26, 2017).

Background

Lava Lake is a privately-owned livestock producer that grazes sheep and cattle south, west and north of Craters of the Moon National Monument and Preserve ("Craters of the Moon", "Craters" or "COTM") and on lands contained within the COTM boundary.

Lava Lake's operating footprint comprises more than 850,000 acres of Idaho rangeland consisting of more than 20,000 acres of our own deeded lands and several hundred thousand acres of federal lands disposed in 34 allotments managed by the Bureau of Land Management ("BLM") and the United States Forest Service ("USFS") in the Sawtooth and Salmon-Challis National Forests, plus state lands managed by the Idaho Department of Lands and various private leases.

Lava Lake is the largest holder of AUMs in the Laidlaw Park allotment, which is entirely contained within the Craters of the Moon boundary. Lava Lake also holds several thousand AUMs in other allotments, such as the Wildhorse allotment, that are partially within the COTM boundary.

Lava Lake's deeded lands directly border COTM lands for several miles on the north side of the Monument and Preserve. Craters of the Moon is our nearest neighbor.

Lava Lake provided input during development of the Craters expansion proposal and ultimately supported the expansion. In fact, Lava Lake mitigated successfully -- for the inclusion of several

thousand acres of lavitic lands north of coincident US Highways 20, 26, and 93 on the north side of COTM during the scoping process precedent to the expansion of Craters of the Moon in late 2000. These lands, which in my opinion offer the sort of geologic values for whose preservation the establishment of the Monument was originally pursued in the 1920s, had not been previously considered for inclusion in the Clinton-era expansion under the 1906 Antiquities Act.

Business Interest

Our business directly relies on the public lands that are the subject of the Secretarial review. The Laidlaw Park allotment alone comprises nearly 90,000 acres of important rangeland. Lava Lake is the largest grazing permit holder within Craters of the Moon. Lava Lake acquired its first grazing preferences in 1999 in respect of lands now included within COTM and began operating there shortly thereafter, prior to the expansion of Craters by President Clinton.

As a transhumance range operator, moving slowly north -- following the "green up" -- from lower elevations on the Snake River Plain (3,800' 5,000'), into the intermediate country north of Highway 20 (5,000' 7,500'), and finally grazing our summer USFS allotments in the high Pioneer Mountains (7,500' 9,500'), we are dependent on near-contiguous grazing preferences, including on public lands, to keep the "tapestry" intact, across more than 125 airline miles one way. It is very important to Lava Lake, as a range operator, that our annual migration not be interdicted by the withdrawal of public lands from our operating footprint. As a consequence, we are very interested indeed in the way our public rangelands are managed and by whom.

Experience with the Expanded COTM

We have worked with all of the COTM-affiliated NPS and BLM managers and range ecologists for more than 17 years. Our experience has been quite positive. Livestock grazing management by BLM (Shoshone Field Office) in COTM has been thoughtful and professional. Although normal agency personnel rotation results in new faces from time to time, we observe that BLM has pursued their mandate consistently in the Craters Resource Management Area. As new ecological and management challenges arise, such as those presented by sage-grouse population dynamics, the agency's grazing management practices have evolved with input from various constituencies, including producers such as ourselves.

Conclusion

Based on this positive experience, Lava Lake requests that the Secretary confirm the current boundaries and management of Craters of the Moon.

Nothing is broken with regard to the area's current management.

In addition, alternatives to the *status quo* present risks, particularly a reversion of status of the 2000 expansion lands or some other contraction of Craters. NPS is under-appropriated and BLM is grossly under-appropriated, in our opinion, and a reversion of status which might involve essentially all of the grazable lands now included in COTM -- could result in less available manpower and financial resources to appropriately manage those lands. Sage-grouse are found on those expansion lands (as typically opposed to barren lava rock) and further delays in permit renewal under NEPA or non-compliance with other environmental policy acts could result in additional litigation by the environmental bar with less agency resources available to defend those actions. In other words, Lava Lake believes its interests are consistent with the interests of others that value a well-managed, sustainable grazing program in Craters (as COTM is currently configured) and with the interests of those that desire a satisfactory ecological outcome.

Craters of the Moon is operated in accordance with the 2007 Craters of the Moon National Monument and Preserve Management Plan developed by NPS and BLM. Lava Lake had multiple opportunities to provide input as the Plan was developed. That Plan adopts a multiple use approach for BLM lands and has proven to be flexible, practical, and durable. BLM recently issued a supplemental final environmental impact statement addressing livestock grazing within the roughly 275,000 acres of lands it manages within Craters of the Moon. That document makes only minor changes in the 2007 Management Plan and continues livestock grazing on nearly all available acres.

In summary, multiple use management is working at Craters of the Moon. These lands and their managers deserve your full support.

Sincerely,

/s/ Brian S. Bean

Brian S. Bean
President