

Director's Protest Resolution Report

**Craters of the Moon National
Monument and Preserve
Proposed Monument
Management Plan
Amendment and Final
Environmental Impact
Statement (PMMPA/FEIS)**

July 31, 2017

BLM



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Reader's Guide

How do I read the Report?

The Director's Protest Resolution Report is divided into sections, each with a topic heading, excerpts from individual protest letters, a summary statement (as necessary), and the Bureau of Land Management's (BLM) response to the summary statement.

Report Snapshot

Issue Topics and Responses
NEPA

Topic heading

Submission number

Issue Number: PP-ID-CRATERS-08-20-10

Protest issue number

Organization: The Forest Initiative

Protesting organization

Protester: John Smith

Protester's name

Issue Excerpt Text:

Direct quote taken from the submission

Rather than analyze these potential impacts, as required by NEPA, the BLM postpones analysis of renewable energy development projects to a future case-by-case analysis.

Summary

General statement summarizing the issue excerpts (optional).

The BLM inadequately analyzes NEPA for renewable energy projects in the PRMP/FEIS.

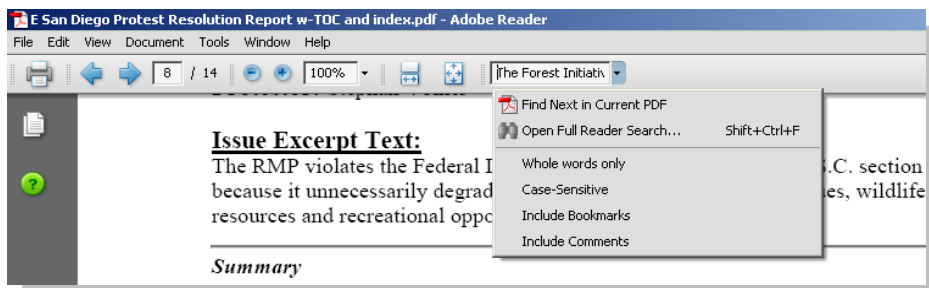
Response

BLM's response to the summary statement or issue excerpt if there is no summary.

Specific renewable energy projects are implementation-level decisions rather than RMP-level decisions. Upon receipt of an application for a renewable energy project, the BLM would require a site-specific NEPA analysis of the proposal before actions could be approved (FEIS Section 2.5.2, p. 2-137). Project specific impacts would be analyzed at that time (including impacts to surrounding properties), along with the identification of possible alternatives and mitigation measures.

How do I find my Protest Issues and Responses?

1. Find your submission number on the protesting party index which is organized alphabetically by protester's last name.
2. In Adobe Reader search the report for your name, organization or submission number (do not include the protest issue number). Key word or topic searches may also be useful.



List of Commonly Used Acronyms

ACEC	Area of Critical Environmental Concern	FWS	U.S. Fish and Wildlife Service
BA	Biological Assessment	GIS	Geographic Information Systems
BLM	Bureau of Land Management	IB	Information Bulletin
BMP	Best Management Practice	IM	Instruction Memorandum
BO	Biological Opinion	KOP	Key Observation Points
CAA	Clean Air Act	MOU	Memorandum of Understanding
CEQ	Council on Environmental Quality	NEPA	National Environmental Policy Act of 1969
CFR	Code of Federal Regulations	NHPA	National Historic Preservation Act of 1966, as amended
COA	Condition of Approval	NOA	Notice of Availability
CSP	Concentrated Solar Power	NOI	Notice of Intent
CSU	Controlled Surface Use	NRHP	National Register of Historic Places
CWA	Clean Water Act	NSO	No Surface Occupancy
DEIS/DRMPA	Draft Environmental Impact Statement /Draft Resource Management Plan Amendment	OHV	Off-Highway Vehicle
DM	Departmental Manual (Department of the Interior)	PA	Preliminary Assessment
DOI	Department of the Interior	PMMPA	Proposed Monument Management Plan Amendment
EA	Environmental Assessment	PPA	Power Purchase Agreement
EIR	Environmental Impact Report	PTNM	Prehistoric Trackways National Monument
EIS	Environmental Impact Statement	RFDS	Reasonably Foreseeable Development Scenario
EO	Executive Order	RMP	Resource Management Plan
EPA	Environmental Protection Agency	ROD	Record of Decision
ESA	Endangered Species Act	ROW	Right-of-Way
FEIS	Final Environmental Impact Statement	SO	State Office (BLM)
FEIS	Final Environmental Impact Statement	T&E	Threatened and Endangered
FLPMA	Federal Land Policy and Management Act of 1976	USC	United States Code
FO	Field Office (BLM)	USGS	U.S. Geological Survey
		VRM	Visual Resource Management
		WA	Wilderness Area
		WSA	Wilderness Study Area
		WSR	Wild and Scenic River(s)

Protesting Party Index

Protester	Organization	Submission Number	Determination
Katie Fite	Wildlands Defense	PP-ID-CRATERS-17-01	Denied/Issues and Comments
Kenneth Cole	Western Watersheds Project	PP-ID-CRATERS-17-02	Denied/Issues and Comments

Issue Topics and Responses

NEPA Range of Alternatives

Issue Number: PP-ID-CRATERS-17-01-24

Organization: WildLands Defense

Protester: Katie Fite

Issue Excerpt Text:

Yet the limited and deficient range of alternatives in the DEIS fails to address restoration as required under the 2007 Plan and ARMPA, and several alternatives would stock lands so that effective restoration would not be possible, and ignores modern day utilization and trampling and shrub browse/breakage standards necessary to protect vital components. We Protest this.

Issue Number: PP-ID-CRATERS-17-01-03

Organization: WildLands Defense

Protester: Katie Fite

Issue Excerpt Text:

We Protest the claim that the Range of Alternatives was “reasonable”. The Purpose was claimed to be: To consider a reasonable range of Alts. But the range is not reasonable - see discussion of Actual Use. Extensive effective restoration must be a vital component of all alternatives. This is required under the 2007 RMP to fulfill the mandate for protection of monument Objects of importance as well as the promises of the ARMPAs to conserve, enhance and restore habitats ad populations. So Alternatives that would stock at or above actual use should be non-starters in the first place.

Issue Number: PP-ID-CRATERS-17-02-10

Organization: Western Watersheds

Protester: Kenneth Cole

Issue Excerpt Text:

The PMMPA differentiates Alternative C from the “No Action Alternative” by stating that Alternative C provides for flexible grazing management and “thus is substantially different from the No Action Alternative.” PMMPA/FEIS at 43. This overstates the lack of flexibility that BLM always has in managing public lands. Under the grazing regulations at 43 C.F.R. § 4110.2-4, the authorized officer may always change permitted use, and every year, an actual use authorization may vary depending on resource conditions. The BLM’s attempt to distinguish Alternative C from the status quo is misleading. This failure to consider reasonable alternatives to status quo grazing, within a National Monument, violates NEPA’s requirements to consider a range of alternatives.

Issue Number: PP-ID-CRATERS-17-02-7

Organization: Western Watersheds

Protester: Kenneth Cole

Issue Excerpt Text:

This was raised in comments (Comment 23 xlix, PMMPA/FEIS Vol. II at 97.) but BLM merely cites back to the same DFCs without addressing the comment that a DFC to maintain livestock should be changed and the BLM’s focus must be on conservation of Monument values. This answer is inadequate, and WWP protests on the basis that BLM’s rationale is arbitrary and capricious, and the agency failed to give a hard look to the range of assumptions with which it chose to limit the selection of alternatives.

Issue Number: PP-ID-CRATERS-17-02-9

Organization: Western Watersheds

Protester: Kenneth Cole

Issue Excerpt Text:

In preparing an EA or EIS, the agency must study, develop and describe appropriate alternatives to the proposed action. 42 U.S.C. § 4332(E). Alternatives are “the heart of the environmental impact statement,” and the agency must “rigorously explore and objectively evaluate all reasonable alternatives.” 40 C.F.R. § 1502.14. See also 40 C.F.R. § 1508.9(b). WWP protests also that BLM arbitrarily

interpreted the court order from 2011 to mean that it only needed to describe a range of alternatives but not actually consider a new range of management practices that could meet the purpose of the original planning effort, many of which do not require maintaining livestock on the monument. 2007 MMP at 6. WWP protests the failure to take a hard look at a true range of alternatives and the agency’s pro forma compliance with NEPA and the court order

Summary:

The Craters of the Moon National Monument and Preserve PMMPA/FEIS Range of Alternatives was deficient because:

- the No Action and Proposed Alternative (Alternative C) are the same, because the only differences those relating to the BLM’s exercise of management discretion;
- each action alternative does not foster effective restoration as called for in the 2007 MMP and ARMPA; and
- several of the fully analyzed alternatives would prevent effective restoration.

Response:

The BLM considered an adequate range of alternatives in the Craters of the Moon National Monument and Preserve PMMPA/FEIS.

There are substantive differences in the alternatives analyzed in the PMMPA/FEIS (See FEIS Table 2.2 “Comparison of Management Actions by Alternative”, p. 60).

A further explanation of the similarities between Alternatives A (No Action) and C (Preferred Alternative) on page xviii of the Executive Summary shows that these two alternatives, while they are superficially similar, are in fact distinct and different from one another:

“The Proposed Plan—Alternative C—is similar to Alternative A, as it makes similar lands available to livestock grazing, but it adjusts the AUMs permitted slightly and includes new direction for grazing management for the benefit of sage-grouse and cultural resources not currently found in Alternative A as amended by the ARMPA. Alternative C also requires analysis of season or timing of use, duration and/or level of use (AUMs), and grazing schedules at grazing permit renewal when livestock management practices are not compatible with meeting or making progress towards Idaho Standards for Rangeland Health. The Proposed Plan offers opportunities to provide for sustainable livestock grazing while protecting Monument values and sage-grouse habitat. The Proposed Plan would give land managers the ability to conduct active vegetation restoration projects and the opportunity to use livestock grazing as a tool to attain

restoration objectives. For example, the Preferred Alternative would direct grazing for sagebrush recovery and to benefit the diversity of seedlings, thereby enhancing the value of sagebrush steppe communities for wildlife such as greater sage-grouse and pygmy rabbits.”

Restoration objectives are integrated into all of the alternatives in the PMMPA/FEIS, including the No Action Alternative. This is because the 2015 Greater Sage-Grouse (GRSG) Approved Resource Management Plan Amendments and FEIS for Idaho and Southwestern Montana (ARMPA) amended the 2007 MMP by adopting conservation measures for the GRSG. NEPA analysis for each alternative in the 2017 PMMPA incorporates these decisions and the accompanying restoration objectives.

While the PMMPA/FEIS considers a range of restoration measures, no action would prevent effective restoration in the PMMPA.

Page 4 of the PMMPA/FEIS (Section 1.2 - Purpose and Need) succinctly clarifies the relationships among the ARMPA, MMPA, and Court Order, as well as how this guided the choice and analysis of alternatives in the MMPA/EIS.

In short, the GRSG ARMPA addresses defects identified by the court in the 2007 MMP associated with sage-grouse analysis. The Craters of the Moon MMPA/EIS will incorporate its outcomes as stipulated, and address all of the deficiencies identified by the court, specifically the lack of no-grazing and reduced-grazing alternatives. The Court Order did not vacate the 2007 MMP; thus, management direction regarding livestock grazing and sage-grouse habitat found in the existing plan did not change. In 2015, the GRSG ARMPA amended the Craters of the Moon MMP. The No Action alternative for that amendment is the 2007 MMP. The decisions in the Craters of the Moon MMP that were made through the GRSG ARMPA process will not vary among the alternatives in this MMPA, as the alternatives are consistent and comply with the DFCs found in the GRSG ARMPA and the 2007 MMP. The only exception is Alternative D, which is inconsistent with the 2007 MMP livestock DFC to “provide livestock forage on a sustainable basis for the life of the plan”.

The scope of the Craters of the Moon PMMPA/FEIS is narrower than the GRSG ARMPA. Specifically, the PMMPA/FEIS is focused on livestock grazing management decisions within the Monument. While the two planning efforts overlap to a limited extent, they focus on separate and distinct planning decisions to be made at different geographic scales. The GRSG ARMPA broadly addresses best management practices for livestock grazing, sets a prioritization scheme whereby grazing permits will be renewed to incorporate GRSG protections, and provides for sage-grouse conservation across Idaho and southwestern Montana. The PMMPA/FEIS specifically considers the allocation of AUMs within the Monument and the availability of Monument lands for grazing, while not amending the GRSG ARMPA.

NEPA – Impacts Analysis – Livestock Grazing

Issue Number: PP-ID-CRATERS-17-01-12

Organization: WildLands Defense

Protester: Katie Fite

Issue Excerpt Text:

We again Protest BLM's reliance on bogus “forage” estimates to claim such gross overstocking as the permitted numbers could be continued. BLM has not revealed the rugged terrain that restricts livestock use, the large amount of rocks in many areas making acreage estimates invalid, the use levels on which this is based, etc. BLM Has also not revealed that the additive and cumulative utilization - if BLM were to effectively measure forage consumed on lands grazed in the spring. Is typically double or more of the amount measured at the end of the grazing/growing season? Further, forage monitoring sites are typically the maximum distance from water sources and zones of more intensive livestock disturbance and located in more “pure” and uniform veg types within a pasture - avoiding the mottled weedlands that are present in so many areas (mix of annual or biennial mustards, scraggly cwg, cheatgrass, etc.)- so the “utilization” and forage sites represent areas receiving less livestock use under current conditions. We Protest the colossal failure of BLM to provide detailed information on the EIS's fantastical forage estimates, the failure to develop a proper carrying capacity and suitability analysis, the failure to explain how and where info related to this sky-high claim was collected and assessed.

Issue Number: PP-ID-CRATERS-17-01-14

Organization: WildLands Defense

Protester: Katie Fite

Issue Excerpt Text:

We Protest this utter lack of analysis of grazing the full number of AUMs. “No Action” is really grazing only 1/3 or so of the AUMs that would be permitted. THAT is what the No Action Alt is based on -but never, ever candidly assesses the potential impacts of grazing the full numbers. We Protest these data and impacts analysis deficiencies.

Issue Number: PP-ID-CRATERS-17-01-17

Organization: WildLands Defense

Protester: Katie Fite

Issue Excerpt Text:

There will be no change in AUM preferences actually available for grazing. THIS is crazy - it is a politically biased decision to continue to artificially overinflate the value of public lands grazing permits. We are also very concerned that the paper cows and sheep maybe used as a basis for getting even more subsidies in a fraudulent manner. What subsidies do all permittees currently get? What are they based on? How are AUMs actually grazed (or not grazed) actually “vetted” by the federal government in doing out wool subsidies, mutton subsidies, “disaster/drought relief, etc.? BLM violates FLPMA and NEPA in failing to squarely address this serious concern.

Issue Number: PP-ID-CRATERS-17-01-18

Organization: WildLands Defense

Protester: Katie Fite

Issue Excerpt Text:

We Protest the failure to take a hard look at

the current footprint of grazing and the disconnect between BLM claims of vegetation, habitat and other land health “improvement”, and the effects of the Proposed Action's drastic stocking that so exceeds actual use.

Issue Number: PP-ID-CRATERS-17-01-20

Organization: WildLands Defense

Protester: Katie Fite

Issue Excerpt Text:

Approximately 1,200 acres are currently unavailable for grazing, leaving 273,900 acres of BLM land open to grazing in the Monument. Under the No Action Alternative, livestock grazing would continue to be managed under direction found in the 2007 MMP, which will be analyzed in two ways:

1. Actual use: 11,791 AUMs over 273,900 acres of public land based on a JS-year average arrives at the existing condition.
2. Full permitted use: Active permitted livestock use of 38,187 AUMs annually over 273,900 acres of public land analyzes full implementation of the alternative. [This is not done].

We Protest that given these numbers, it is impossible to understand HOW BLM could come up with the sky high forage estimate of the FEIS. It is also very unclear how many AUMs and how much forage is on Monument lands - vs. other areas of pastures/allotments not within the Monument boundaries. This is especially the case since within any allotment - as one gets closer to the big central block of lava, the site conditions typically get rockier and LESS productive.

Issue Number: PP-ID-CRATERS-17-01-22

Organization: WildLands Defense

Protester: Katie Fite

Issue Excerpt Text:

BLM provides no basis for valid analysis and comparisons by trying to bury the role of livestock grazing disturbance and livestock as weed vectors in weed problems across the Monument. Simplistic claims such as the following are made: The dispersal and spread of noxious weeds can happen through a variety of means, including the visitor use for resources offered in the Monument (e.g. hunting, camping, and OHV use), wildfires, as well as natural transportation means, such as wind, birds, and other wildlife. Livestock can contribute to the dispersal of weed seeds and materials through feed consumption, and seeds can be transported by livestock coats and also by vehicles and equipment related to livestock grazing. Certified weed-free hay is required on all BLM lands (USDI BLM, 2011). We Protest this.

Issue Number: PP-ID-CRATERS-17-01-25

Organization: WildLands Defense

Protester: Katie Fite

Issue Excerpt Text:

We Protest the failure to assess the degree to which the livestock-associated water hauling and other activity conflicts with GRSG and other sensitive species needs for secure undisturbed habitats to fulfill seasonal needs. See Connelly et al. 2004, Knick and Connelly, eds. 2011.

Issue Number: PP-ID-CRATERS-17-02-11

Organization: Western Watersheds

Protester: Kenneth Cole

Issue Excerpt Text:

In information released to WWP pursuant to a FOIA request in 2017, BLM has announced its Idaho allotment prioritization

scheme and schedule for reevaluating allotments under the ARMPAs. The failure to include and consider this information in the final EIS is a failure to disclose the actual impacts and timeline of the proposed action, and WWP protests on this basis. Without firm timelines, it is impossible to understand the effectiveness of the PMMPA and this fails to foster “informed decision making” as required by NEPA, or achieve the protections demanded by agency policies and FLPMA. WWP protests on this basis.

Issue Number: PP-ID-CRATERS-17-02-16
Organization: Western Watersheds
Protester: Kenneth Cole

Issue Excerpt Text:

The PMMPA/FEIS fails to truly address the difference between cattle and sheep authorizations and the implications for sage-grouse habitat. The proposed alternative allows for conversion among livestock types (GRAZ-26C at PMMPA/FEIS at 51), but the affected environment section of the EIS fails to really describe what is different about cattle and sheep grazing operations (namely, herding, concentrated bedding, levels of soil compaction, use of forbs compared with other types of vegetation). This issue was raised in comments. See 26 xxix at PMMPA/FEIS Vol. II at 121. BLM merely punts the analysis to some unknown future date, despite having allowed for it specifically in this amendment. Having failed to really undertake an analysis of the proposed action in light of these differential impacts is a failure under NEPA.

Issue Number: PP-ID-CRATERS-17-02-17
Organization: Western Watersheds
Protester: Kenneth Cole

Issue Excerpt Text:

but fails to link the cumulative spread of cheatgrass to the widespread disturbance of soil crusts caused by livestock grazing. This is the process that results in the conversion of the delicate arid landscape of Craters of the Moon from a sagebrush dominated landscape to the fire prone, cheatgrass dominated landscape we have now. Because the PMMPA is the basis for future grazing authorizations (See 43 U.S.C. § 1732(a) and §1752(c)(1)), it is critically important that the EIS considers all of the evidence available to the BLM. The updated discussion of soil resources contained in section 3.2.1 does not provide any analysis of susceptibility of soils to weed invasion due to the nonfunctional biological soil crusts. Presumably there is some correlation between the figures in Figure 3.2 Natural Soil Susceptibility to Wind Erosion, which shows that 87.3% of the CRMO soils are susceptible to wind erosion, but this measurement is not analogous to the susceptibility of soils to weed invasion, particularly cheatgrass invasion. There is no cumulative effects analysis of how the acknowledged “moderate” effects of summer grazing on soil resources would affect cheatgrass prevalence and, in turn, the shortening fire intervals..

Summary:

The Craters of the Moon National Monument and Preserve PMMPA/FEIS fails to adequately analyze the impacts of livestock grazing because:

- it does not adequately explain how forage estimates were reached;
 - there is no analysis of grazing the full number of AUMs;
 - it does not address subsidies received by permittees;
 - the current footprint of grazing is not addressed;
 - it does not address the differences between impacts from cattle and sheep;
 - the BLM did not include its prioritization schemes and schedules for reevaluating allotments pursuant to the ARMPA;
 - it does not adequately analyze the effects, particularly cumulative effects, of grazing on cheatgrass prevalence and fire intervals; and
 - it fails to address the impact of livestock-associated water hauling to sage grouse and other sensitive species.
-

Response:

NEPA directs that data and analyses in an EIS must be commensurate with the importance of the impact (40 CFR 1502.15), and that NEPA documents must concentrate on the issues that are truly significant to the action in question, rather than amassing needless detail (40 CFR 1500.1(b)). The BLM is required to take a hard look at potential environmental impacts of adopting the PMMPA.

The level of detail of the NEPA analysis must be sufficient to support reasoned conclusions by comparing the amount and the degree of change (impact) caused by the proposed action and alternatives (BLM Handbook H-1790-1, Section 6.8.1.2). The BLM need not speculate about all conceivable impacts, but it must evaluate the reasonably foreseeable significant effects of the proposed action.

Forage Estimates

Appendix D, Forage Production Estimation, of the PMMPA/FEIS contains a detailed discussion of the methodologies used to calculate forage. CEQ regulations at 40 CFR 1502.14(d) require an EIS to analyze a “No Action” Alternative, which is defined as no change from current management direction. Under the No Action Alternative contained in the PMMPA/FEIS, livestock grazing would continue to be managed under the direction found in the 2007 MMP, as amended by the 2015 GRSG ARMPA. While the analysis of actual livestock use for allotments provides a more accurate baseline in which to compare other alternatives, the protester’s claim that the FEIS does not analyze full permitted use is incorrect. Section 2.2.1 of the FEIS provides an overview of Alternative A, and states that the alternative will be analyzed in two ways: “1. Actual use: 11,791 AUMs (with a high actual use of 19,388 AUMs) over 273,900 acres of public land based on a 15-year average arrives at the existing condition and trend (average utilization of 11% of perennial grass production); 2. Full permitted use: Active permitted livestock use of 38,187 AUMs annually over 273,900 acres of public land analyzes full implementation of the alternative (projected utilization of 34% of perennial grass production).”

Grazing subsidies

As previously stated, NEPA directs that the data and analyses in an EIS be commensurate to the impacts, and that the analyses concentrate on the issues that are significant to the action without amassing needless detail. The analysis within the PMMPA/FEIS reflects the potential impacts of livestock grazing within the planning area. The FEIS does not analyze subsidies to grazing permittees, nor would attempting such analysis be useful in understanding the effects of adopting the proposed plan amendment.

Current footprint of grazing

Chapter 3 of the FEIS describes the current condition of the affected resources within the planning area. Additionally, Chapter 4 includes discussion of the potential impacts associated with each alternative. The analysis in Chapter 4 for the No Action Alternative provides a look at the current impact of livestock grazing in the planning area and how it compares to the other alternatives. See FEIS Chapter 4 for a discussion of impacts associated with all alternatives, including the Proposed Plan.

Differences between impacts of cattle and sheep

Comment letter 26 xxix urges that “impacts to native wildlife species, including migration routes, should be considered in any conversion process. If conversions occur, range improvements and grazing schedules should be designed in a way that does not result in adverse impacts to resident or migrating wildlife species,” (PMMPA/FEIS Volume II, p. 121). As noted in the response to this comment, impacts to wildlife and their habitat would be analyzed if/when any future conversion proposals are submitted. With that said, the FEIS does describe differences in impacts from cattle and sheep grazing that are sufficient for a planning-level analysis. For example, “livestock forage utilization levels would be established on a case-by-case basis under Alternative A, which typically manages forage use to not exceed moderate utilization of key forage species. In areas where utilization levels are excessive (>60%), such as near water troughs and sheep bed grounds, adverse effects on wildlife resulting from competition for forage would be long-term,” (PMMPA/FEIS, p. 205). Impacts specific to livestock type (e.g., sheep bed grounds, cattle trails, etc.) are described throughout the FEIS, as appropriate.

Discussion of prioritization

The PMMPA/FEIS Executive Summary provides a description of the scope of the plan amendment and its relationship to the Greater Sage Grouse ARMPA. “The PMMP Amendment/FEIS is focused on livestock grazing management decisions within the Monument. While the two planning efforts overlap to a limited extent, they focus on separate and distinct planning decisions to be made at different geographic scales. The GRSG ARMPA broadly addresses livestock grazing best management practices, sets a prioritization scheme whereby grazing permits will be renewed or incorporate GRSG protections, and provides for sage grouse conservation across Idaho and southwestern Montana,” (PMMPA/FEIS, p. xviii). In contrast, the PMMPA/FEIS specifically considers the allocation of AUMs within the Monument and the availability of Monument lands for grazing, as prescribed in Appendix C of BLM Handbook H-1601-1. The review of grazing permits is an implementation-level action that will occur pursuant to the ARMPA. The PMMPA/FEIS does not amend the ARMPA. Discussion of BLM Idaho’s prioritization scheme would be unnecessary to understanding the potential impacts of adopting

the proposed plan amendment.

Impacts of grazing on cheatgrass and fire intervals

The FEIS acknowledges that livestock grazing may contribute to the spread of weeds. Section 4.2.3.3 provides a general discussion of how different activities, including livestock grazing, affect vegetation resources such as weeds. Further, FEIS Section 4.2.3.4 includes a detailed discussion of impacts to vegetation resulting from each alternative.

Regarding the lack of cumulative effects analysis described by the protester, Section 4.1.1 of the FEIS defines “moderate” impacts, stating that the “effects on the resource or resource use would be readily detectable, but localized. Mitigating measures, if needed to offset adverse effects, would be extensive and probably would be successful. For livestock grazing, localized effects would be defined as affecting an allotment, and/or pastures or small portions of multiple allotments.” Section 4.2.1.4 of the FEIS provides a discussion of the potential impacts to soil resources of each alternative. Specific to impacts of summer livestock grazing on soil resources, the analysis includes the following: “Summer in the planning area is associated with hotter and drier conditions and the completion of plant growth cycles. Although biological soil crusts are not actively growing, they are most susceptible to physical disturbance and are easily destroyed during the hotter and drier months,” (PMMPA/FEIS, p. 153).

Section 4.3.1.1 of the FEIS describes the potential cumulative effects related to soil resources. In regards to the cumulative effects on soils, the FEIS discloses that “vegetation cover loss correlates to an increased potential for soil loss, so the occurrence of wildland fires will continue to require emergency stabilization to facilitate vegetation establishment and recovery, when deemed necessary,” (PMMPA/FEIS, p. 274). This section further acknowledges wildland fire severity and frequency could increase.

Livestock-associated water hauling

The discussion of impacts related to water hauling within the FEIS is sufficient for a planning-level analysis. For example the PMMPA/FEIS states that “utilization at the full allocated AUM level would result in an increase in disturbances related to livestock grazing compared to average actual use, but similar to the fully utilized No Action Alternative. These could include increases to the number of livestock at existing bedding grounds, increased mineral placement, and an increase in livestock at existing water haul sites. These are localized increases in disturbance. These disturbances would remain the same, but would likely increase in size. Increases in soil compaction and a shift from desirable to invasive species could be expected if proper mitigation measures or increases in infrastructure is not limited,” (PMMPA/FEIS, p. 185). If grazing is permitted on approved areas, standard terms and conditions are applied. Further analysis of the impacts of water hauling would occur at that time.

In conclusion, the FEIS analyses impacts pertaining to different aspects of grazing from adopting the proposed plan amendment.

NEPA – Impacts Analysis – Wildlife

Issue Number: PP-ID-CRATERS-17-02-15
Organization: Western Watersheds
Protester: Kenneth Cole

Issue Excerpt Text:

WWP raised the failure to analyze collision risk with fences in its comments. Comment 33 xvi, PMMPA/FEIS Vol. II. At 153. In response, BLM included an analysis of the collision risk and estimated 14 miles of high risk fencing, 15 miles of moderate risk, and 8 miles of low risk fencing within the Monument. PMMPA/FEIS at 202. The BLM failed to discuss any efforts to address or mitigate the impacts of the existing fencing and only discusses the possibility of new fencing and future adherence to the ARMPA’s best management practices and RDFs. PMMPA/FEIS at 210. But the ARMPAs direct BLM to “Prioritize removal, modification or marking of fences or other structures in areas of high collision risk following appropriate cooperation, consultation and coordination to reduce the incidence of mortality due to fence strikes.” PMMPA/FEIS Appendix C at 355. Thus, the PMMPA/FEIS doesn’t conform to the ARMPA and fails to conform to a governing land use plan, in violation of

FLPMA. This lack of analysis also fails NEPA, and WWP protests on these bases.

Issue Number: PP-ID-CRATERS-17-02-3
Organization: Western Watersheds
Protester: Kenneth Cole

Issue Excerpt Text:

The PMMPA/FEIS fails to adequately consider the impact of livestock grazing on sage grouse summer riparian habitat. The PMMPA/FEIS fails to disclose the location and condition of riparian-wetland areas on the Craters of the Moon National Monument and consider the impacts that livestock grazing has on these critical areas for sage-grouse summer habitat. Riparian-wetland areas are critical in the life history for sage-grouse and are used for brood-rearing habitat. The NTT Report identified “an important objective in managing livestock grazing is to maintain residual cover of herbaceous vegetation to reduce predation during nesting (Beck and Mitchell 2000) and to maintain the integrity of riparian vegetation and other wetlands (Crawford et al. 2004)”.

Summary:

The Craters of the Moon National Monument and Preserve PMMPA/FEIS violates the requirements of the National Environmental Policy Act (NEPA) and Federal Land Policy and Management Act (FLPMA) regarding impacts to wildlife because:

- it fails to adequately analyze fence collision risk or means to mitigate that risk;
 - it fails to conform requirements established in the 2015 GRSG ARMPA relating to the reduction of wildlife mortality incidences such as fence strikes; and
 - it fails to address the impacts of livestock grazing on Greater Sage-grouse summer riparian habitat.
-

Response:

NEPA directs that data and analyses in an EIS must be commensurate with the importance of the impact (40 CFR 1502.15), and that NEPA documents must concentrate on the issues that are truly significant to the action in question, rather than amassing needless detail (40 CFR 1500.1(b)). The BLM is required to take a “hard look” at potential environmental impacts of adopting the Craters of the Moon National Monument and Preserve PMMPA/FEIS. The level of detail of the NEPA analysis must be sufficient to support reasoned conclusions by comparing the amount and the degree of change (impact) caused by the proposed action and alternatives (BLM Handbook H-1790-1, Section 6.8.1.2). The BLM need not speculate about all conceivable impacts, but it must evaluate the reasonably foreseeable significant effects of the proposed action.

A land use planning-level decision is broad in scope. For this reason, analysis of land use plan alternatives is typically broad and qualitative rather than quantitative or focused on site-specific actions. The baseline data provides the necessary basis to make informed land use plan-level decisions.

As the decisions under consideration by the BLM are programmatic in nature and would not result in on-the-ground planning decision or actions (e.g., the BLM is not approving an Application for Permit to Drill to start drilling or approving a grazing permit renewal), the scope of the analysis was conducted at a regional, programmatic level. The analysis focuses on the direct, indirect, and cumulative impacts that could potentially result from on-the-ground changes. This analysis identifies impacts that may result in some level of change to the resources, regardless of whether that change is beneficial or adverse.

The Craters of the Moon National Monument and Preserve PMMPA/FEIS amends the existing 2007 Monument Management Plan, as amended by the 2015 GRSG ARMPA. This plan amendment complements the 2015 GRSG ARMPA by focusing on livestock grazing allocation decisions for the planning area, including analyzing a range of reasonable alternatives with respect to those allocation decisions, and does not amend the GRSG ARMPA or its goals, objectives, and management decisions for protecting greater sage-grouse and its habitat. The major issues in this plan amendment are decisions on the location and amount of livestock grazing and protection of Monument values, including sage-grouse and their habitat, in conformance with the GRSG ARMPA. The effects of fencing were analyzed for all alternatives in this plan amendment, including for Alternative D – see Section 4.3.1.4 for cumulative effects of fencing on sage-grouse. Collision risk estimates for fences, using the Sage-Grouse Initiative fence collision tool, have also been updated and provided in the Craters of the Moon National Monument and Preserve PMMPA/FEIS. The GRSG ARMPA also addresses fencing impacts and provides required design features to mitigate effects. If and when new fencing is proposed in GRSG habitat, the BLM will evaluate the risk of collision. If a risk is found, the BLM will conduct mitigation to minimize for it.

The BLM complied with NEPA’s requirement to analyze the environmental consequences and impacts to wildlife from livestock grazing in the Craters of the Moon National Monument and Preserve PMMPA/FEIS planning effort.

NEPA – Impacts Analysis – Vegetation

Issue Number: PP-ID-CRATERS-17-01-6

Organization: WildLands Defense

Protester: Katie Fite

Issue Excerpt Text:

BLM, with great bias towards continuing status quo stocking, paper cows and sheep that ranchers can use to get loans and subsidies based on, and grazing at all costs, provides an arbitrary self-serving and rosy picture of cwg - claiming because cwg can be beat to death by livestock and survive - it is resilient and can withstand moderate to heavy grazing. We stress that cows and sheep eat anything BUT the CWG. Not only is cwg highly aggressive and out-competes native forbs and grasses, agency stocking based on mere forage results in the inability of essential native vegetation components to recover - as livestock avoid the coarse unpalatable exotic cwg and intermediate wheat, too. IWG is also rhizomatous which means it chokes out natives, covers the ground surface, and prevents their recovery. We Protest the failure to take a hard look at the profound negative ecological impacts of cwg/iwg. Plus, research at INL has now shown that cwg is weedy and invasive. XXX

Issue Number: PP-ID-CRATERS-17-01-8

Organization: WildLands Defense

Protester: Katie Fite

Issue Excerpt Text:

We Protest the shocking lack of candid analysis of noxious and non-noxious exotic species problems in the Monument that are increasing with each grazing disturbance bout that is inflicted. For example, BLM

FEIS Table and text claims “containment” is the goal for rush skeleton weed, and knapweed, yet BLM fails to properly map the dramatic increase in rush skeleton weed - from almost no rush skeleton weed at the time of the Monument designation to the present.

Issue Number: PP-ID-CRATERS-17-01-9

Organization: WildLands Defense

Protester: Katie Fite

Issue Excerpt Text:

BLM relies on its woefully outdated 2007 Vegetation Treatment in 17 western states EIS- which specifically did NOT address the role of “allocations”, such as livestock grazing acres and stocking, in considering exotic invasive species infestations and there was no integrated prevention, “treatment” or other approach that addressed this. Thus, BLM must thoroughly analyze the direct indirect and cumulative effects of the stocking, facilities, use levels, areas Open to grazing, etc. and other related allocations in this current process, and has woefully failed to do so. Oust, Plateau and other herbicides used to “control” cheatgrass have serious adverse effects to non-target native species – killing bunchgrasses and forbs at times. BLM woefully failed to consider all of these livestock related management concerns in this deeply flawed FEIS. We Protest this. See Belsky and Gelbard 2000, Connelly et al. 2004 Sage-grouse Conservation Assessment, Knick and Connelly 2011, Studies in Avian Biology, Reisner et al. 2013, Chuoing et al. 2015.

Issue Number: PP-ID-CRATERS-17-02-14
Organization: Western Watersheds
Protester: Kenneth Cole

Issue Excerpt Text:

The Idaho/SW Montana ARMPA requires that BLM maintain all lands ecologically capable of producing sagebrush (but no less than 70 percent) within a minimum of 15% sagebrush cover or as consistent with specific ecological site conditions. ARMPA at 1-13. The PMMPA/FEIS provides no analysis of how BLM intends to meet this requirement and, since livestock grazing contributes to sagebrush degradation through habitat conversion from invasive 4 Crist, M.R., S.T. Knick, and S.E. Hanser. 2017. Range-wide connectivity of

priority areas for Greater sage-grouse: Implications for long-term conservation from graph theory. *The Condor* 119:44-57. Attached.; Todd B. Cross, David E. Naugle, John C. Carlson, and Michael K. Schwartz (2017) Genetic recapture identifies long-distance breeding dispersal in Greater Sage-Grouse (*Centrocercus urophasianus*). *The Condor*: February 2017, Vol. 119, No. 1, pp. 155-166 and highly-flammable grasses, the impacts of the proposed action should have been evaluated in this context. This lack of analysis also fails to meet the key management objectives outlined in the 2007 MMP, specifically to “proactively protect and restore sagebrush steppe communities” (PMMPA/FEIS at 7).

Summary:

The Craters of the Moon National Monument and Preserve PMMPA/FEIS violates the requirements of NEPA regarding impacts analysis for vegetation, due to inadequate analysis:

- on the negative ecological impacts of crested and intermediate wheatgrasses and other exotic noxious and non-noxious species;
- of treatment options for exotic invasive species, and
- on meeting minimum thresholds for sagebrush habitat and the impacts of livestock grazing on this habitat.

Response:

NEPA directs that data and analyses in an EIS must be commensurate with the importance of the impact (40 CFR 1502.15), and that NEPA documents must concentrate on the issues that are truly significant to the action in question, rather than amassing needless detail (40 CFR 1500.1(b)). The BLM is required to take a “hard look” at potential environmental impacts of adopting the Craters of the Moon National Monument and Preserve PMMPA/FEIS. The level of detail of the NEPA analysis must be sufficient to support reasoned conclusions by comparing the amount and the degree of change (impact) caused by the proposed action and alternatives (BLM Handbook H-1790-1, Section 6.8.1.2). The BLM need not speculate about all conceivable impacts, but it must evaluate the reasonably foreseeable significant effects of the proposed action.

A land use planning-level decision is broad in scope. For this reason, analysis of land use plan alternatives is typically broad and qualitative rather than quantitative or focused on site-specific actions. The baseline data provides the necessary basis to make informed land use plan-level decisions.

As the decisions under consideration by the BLM are programmatic in nature and would not result in on-the-ground planning decision or actions (e.g., the BLM is not approving an Application for Permit to Drill to start drilling or approving a grazing permit renewal), the scope of the analysis was conducted at a regional, programmatic level. The analysis focuses on the direct, indirect, and cumulative impacts that could potentially result from on-the-ground changes. This analysis identifies impacts that may result in some level of change to the resources, regardless of whether that change is beneficial or adverse.

Regarding noxious weeds and invasive plants, the preferred alternative, Alternative C of the Craters of the Moon National Monument and Preserve PMMP/FEIS, specifically allows for directed grazing toward non-native plant communities, including crested wheatgrass, to allow for sagebrush recovery. Please see Chapter 3 – Vegetation for a discussion of restoration needs, specifically the reestablishment of sagebrush. Furthermore, the existing 2007 MMP direction provides guidance for sagebrush restoration activities – see Appendix D of the FEIS. The goals and objectives for restoration in the 2007 MMP were not remanded by the Court. Regarding treatment options for exotic invasive species, integrated weed management was outside the scope of the Craters of the Moon National Monument and Preserve PMMPA/FEIS and has been addressed in the 2017 Twin Falls District Noxious Weed and Invasive Plant environmental assessment.

The BLM complied with NEPA’s requirement to analyze the environmental consequences/impacts to vegetation from livestock grazing in the Craters of the Moon National Monument and Preserve PMMPA/FEIS planning effort.

NEPA – Impacts Analysis – Cultural

Issue Number: PP-ID-CRATERS-17-01-15
Organization: WildLands Defense
Protester: Katie Fite

Issue Excerpt Text:

We Protest that Cultural resources are glossed over with almost no info provided or collected on livestock adverse impacts and

minimization and mitigation measures. This is despite the serious damage livestock degradation and trampling, livestock caused erosion, etc. may do to sensitive cultural sites - breaking artifacts, exposing them to looting, churning and disruption, site stratigraphy and the scientific value of sites, etc.

Summary:

The Craters of the Moon National Monument and Preserve PMMPA/FEIS violates the requirements of NEPA regarding impacts analysis because it fails to address the adverse impacts of livestock on cultural resources.

Response:

NEPA directs that data and analyses in an EIS must be commensurate with the importance of the impact (40 CFR 1502.15), and that NEPA documents must concentrate on the issues that are truly significant to the action in question, rather than amassing needless detail (40 CFR 1500.1(b)). The BLM is required to take a “hard look” at potential environmental impacts of adopting the Craters of the Moon National Monument and Preserve PMMPA/FEIS. The level of detail of the NEPA analysis must be sufficient to support reasoned conclusions by comparing the amount and the degree of change (impact) caused by the proposed action and alternatives (BLM Handbook H-1790-1, Section 6.8.1.2). The BLM need not speculate about all conceivable impacts, but it must evaluate the reasonably foreseeable significant effects of the proposed action.

A land use planning-level decision is broad in scope. For this reason, analysis of land use plan alternatives is typically broad and qualitative rather than quantitative or focused on site-specific actions. The baseline data provides the necessary basis to make informed land use plan-level decisions.

As the decisions under consideration by the BLM are programmatic in nature and would not result in on-the-ground planning decision or actions (e.g., the BLM is not approving an Application for Permit to Drill to start drilling or approving a grazing permit renewal), the scope of the analysis was conducted at a regional, programmatic level. The analysis focuses on the direct, indirect, and cumulative impacts that could potentially result from on-the-ground changes. This analysis identifies impacts that may result in some level of change to the resources, regardless of whether that change is beneficial or adverse.

Cultural resource impacts were analyzed in detail throughout the Craters of the Moon National Monument and Preserve PMMPA/FEIS. Chapter 3, Section 3.2.6 describes the existing condition for cultural resources in the planning area and Chapter 4, Section 4.2.6 provides an analysis of effects of livestock grazing on cultural resources under each alternative. As noted in

the Craters of the Moon National Monument and Preserve PMMPA/FEIS, currently, the main impacts to cultural resources are wildfires, wildfire suppression, and human vandalism and looting. Furthermore, the Tribes have an expanded definition of cultural resources and this is recognized in Chapter 3, Section 3.2.5 and analyzed in Chapter 4, Section 4.2.5.

The BLM complied with NEPA's requirement to analyze the environmental consequences/impacts to cultural resources from livestock grazing in the Craters of the Moon National Monument and Preserve PMMPA/FEIS planning effort.

NEPA – Impacts Analysis – Soils and Soil Erosion

Issue Number: PP-ID-CRATERS-17-01-5

Organization: WildLands Defense

Protester: Katie Fite

Issue Excerpt Text:

We Protest the failure of the FEIS to take a hard look at the soil erosion susceptibility documented in the AMS. AMS Wind erosion shows that many soils are susceptible to “moderate”, water erosion susceptibility is moderate as well.

Summary:

The Craters of the Moon National Monument and Preserve PMMPA/FEIS fails to take a hard look at the soil erosion susceptibility to erosion by wind and water.

Response:

NEPA directs that data and analyses in an EIS must be commensurate with the importance of the impact (40 CFR 1502.15), and that NEPA documents must concentrate on the issues that are truly significant to the action in question, rather than amassing needless detail (40 CFR 1500.1(b)). The BLM is required to take a “hard look” at potential environmental impacts of adopting the PMMPA/FEIS. NEPA directs that data and analyses in an EIS must be commensurate with the importance of the impact (40 CFR 1502.15), and that NEPA documents must concentrate on the issues that are truly significant to the action in question, rather than amassing needless detail (40 CFR 1500.1(b)). The BLM is required to take a “hard look” at potential environmental impacts of adopting the PMMPA/FEIS.

The level of detail of the NEPA analysis must be sufficient to support reasoned conclusions by comparing the amount and the degree of change (impact) caused by the proposed action and alternatives (BLM Handbook H-1790-1, Section 6.8.1.2). The BLM need not speculate about all conceivable impacts, but it must evaluate the reasonably foreseeable significant effects of the proposed action.

A land use planning-level decision is broad in scope. For this reason, analysis of land use plan alternatives is typically broad and qualitative rather than quantitative or focused on site-specific actions. The baseline data provides the necessary basis to make informed land use plan-level decisions. A land use planning-level decision is broad in scope. For this reason, analysis of land use plan alternatives is typically broad and qualitative rather than quantitative or focused on site-specific actions. The baseline data provides the necessary basis to make informed land use plan-level decisions.

As the decisions under consideration by the BLM are programmatic in nature and would not result in on-the-ground planning decision or actions erosion control by wind and water. The analysis focuses on the direct, indirect, and cumulative impacts that could potentially result from on-the-ground changes. Section 4.2.1.3 lists numerous causes of accelerated erosion (i.e. vegetation treatments, livestock, wildfire). This analysis identifies impacts that may result in some level of change to the resources, regardless of whether that change is beneficial or adverse.

The PMMPA/FEIS takes a hard look at resources including the soil erosion susceptibility to erosion by wind and water.

NEPA – Impacts Analysis – Socioeconomics and Environmental Justice

Issue Number: PP-ID-CRATERS-17-01-13
Organization: WildLands Defense
Protester: Katie Fite

Issue Excerpt Text:

We Protest the extremely limited socioeconomic info. It is pretty much a non-analysis- especially of costs of grazing, resource values lost, weed costs, fire costs (fires driven by weeds, dense forage seedings), etc.

Issue Number: PP-ID-CRATERS-17-01-16
Organization: WildLands Defense
Protester: Katie Fite

Issue Excerpt Text:

We Protest the FEIS's minimal to non-existent economic analysis, and lumping public lands grazing with other feedlots, row crops, and other ag. Farm earnings (of which grazing is a small part) - are only a small part of the local economy, which is much more based on recreation and other inputs. Exploitation of workers

(particularly sheepherders) and environmental justice must be considered here. Costs to the public, including alternative uses foregone, costs to recover a pygmy rabbit population in an area where grazing and seeding with cwg wiped it out – as an example - must be assessed. Costs of herbicide use must be identified, as must all costs of the grazing scheme and artificial inflated stocking to benefit ranchers.

Issue Number: PP-ID-CRATERS-17-01-27
Organization: WildLands Defense
Protester: Katie Fite

Issue Excerpt Text:

We protest that the EIS lacks a candid discussion of environmental justice and human rights particularly as it applies to the Peruvian or other sheepherders or impoverished cowhands that are exploited by ranchers profiting from the public lands grazing permits in the Monument.

Summary:

The Craters of the Moon National Monument and Preserve PMMPA/FEIS fails to adequately analyze socioeconomics, including environmental justice.

Response

The BLM analyzes socioeconomic impacts in Chapter 3, Section 3.3.4 of the PMMPA/FEIS. Additionally, Chapter 4, Section 4.2.13.3 discusses how grazing and other activities affect socioeconomic values. In particular, the BLM includes an analysis of the contemporary and traditional patterns of work and family life, relationships, and how communities are or may be affected by grazing management. “The degree to which these possible effects might be felt in any given community within the study area would depend on the relative resilience and flexibility of relationships, social systems, and networks of various types within those communities. It is possible that in communities where traditions are based on long-standing cultural values rather than being primarily based on current economic activity within the livestock industry, adjustments within the ranching sector might have only a minimal impact on

social and cultural relationships and activities within the community itself. It is often the case that ranchers remain active in the cattle or sheep business because of family traditions, personal values, and cultural history. These factors are recognized as having value to communities within the region surrounding the Monument” (PMMPA/FEIS, p. 265).

Section 4.2.13.4 describes the full suite of potential social impacts that each action alternative has resulting from possible changes to grazing management. This includes population, economic values, movement, housing, property values, industry, employment, and tax revenues. This section also discusses the general measures that would be taken to avoid or minimize impacts related to the socioeconomic environment.

In regards to environmental justice, Chapter 4, Section 4.2.13 of the PMMPA/FEIS sufficiently addresses demographic statistics related to the higher percentage of Hispanic and Latin origin residents in this area compared to Idaho as a whole. On page 263, the PMMPA/FEIS further discusses environmental justice issues with these populations and workers in the study area, and goes on to indicate that it is possible that reductions in permitted AUMs could have a disproportionately negative impact on Hispanic workers and populations within the study area. Whether or not this disproportionate impact would be realized would depend on the specific decisions made by affected ranchers in response to any reductions in AUMs.

FLPMA

Issue Number: PP-ID-CRATERS-17-02-1

Organization: Western Watersheds

Protester: Kenneth Cole

Issue Excerpt Text:

The PMMPA/FEIS's adoption of and tiering to the ARMPA is a generalized failure to impose any meaningful changes, instead indefinitely delaying imposing any requirements for grazing management revisions to protect sage-grouse habitat and populations, and then only under very narrow and highly discretionary circumstances. Where WWP raised the need for immediate implementation of habitat changes in comments (33 xvii,

PMMPA/FEIS Vol II at 153), BLM just cited to consistency with the ARMPA rather than address the overarching flaw of delay built into the process. WWP protests this response as inadequate to address the immediate needs of sage-grouse, and we note that the Proclamation doesn't say, "Conserve, protect, and restore.... when you get around to it." The failure to impose meaningful management at the level of the land use plan – or even a firm commitment/deadline to impose meaningful management at the allotment level– fails FLPMA. 43 U.S.C. 1732(b).

Summary:

WWP protests the BLM's response as inadequate to address the immediate needs of the Greater Sage-grouse, which is a failure of FLPMA.

Response:

As stated in page 1-25 of the ARMPA ROD the approach is clear: "To ensure that grazing continues in a manner consistent with the objective of conserving the GRSG and its habitat, the Great Basin ARMPAs require incorporating terms and conditions informed by GRSG habitat objectives into grazing permits, consistent with the ecological site potential of the local areas, prioritizing reviewing and processing authorizations and field checks of grazing permits, and taking numerous actions to avoid and minimize the impacts of range management structures (see Table 1-4)".[Emphasis added].

The BLM notes in the PMMPA/FEIS, Section 3.2.4, Wildlife and Fish, Including Special Status Species, p 111 that, "Potential and current threats to sage-grouse in the Monument include wildfire and the change in wildfire frequency, incursion of invasive plants, drought, and improperly managed livestock grazing [USDI USFWS, 2010 & 2013]." Additionally, Executive Summary, p. xvii of the PMMPA/FEIS states, "Wildfire and the incursion of invasive plants are currently identified as primary threats to sage-grouse habitat on public lands in Idaho [USDI USFWS, 2013], including within the xvii Monument [Jurs and Sands, 2004]). Since the 2007 MMP, wildfires have markedly reduced the amount of key sage grouse habitat to 27% of the habitat in the Monument." Section 3.2.4, p. 116, discusses GRSG habitat that has been destroyed by fire, and Section 3.3.1 specifies that 62 percent of the Craters of the Moon National

Monument is not available for livestock use, as it is located within the National Park Service boundary of the Monument.

Section 3.2.3, p. 82-84 of the PMMPA/FEIS discusses the role that fire plays on vegetation and habitat on and adjacent to the Monument. “Fire plays a key role in determining the diversity and condition of vegetation communities. Large tracts of sagebrush have been lost due to extensive wildfires, and fires have perpetuated exotic annual grasslands. However, fire also plays an important role in the maintenance of some vegetation types, including aspen and mountain shrub. Please refer to the 2007 MMP, Chapter 2, Natural Resources, Vegetation, including Special Status Species and Fire Management (pp. 22–23) for more details about wildland fires in the Monument”. Please also refer to Figure 3.4, “Fire Frequency in the Monument (1970-2016)” on page 83.

As noted on p. 32 of FEIS Vol. 2 - Response to Comments (xlix), “[the] ARMPA provides guidance for the prioritization of grazing permit renewal in areas of Sagebrush Focal area and high priority habitat.”

Consistent with ARMPA, this PRMPA/FEIS analyzes other immediate needs of the GRSG, not solely impacts from livestock grazing, but greater threats to the species, such as fire. Following the approval of the Record of Decision for the PMMPA/FEIS, the BLM will undertake specific implementation actions to continue to address the needs of the GRSG in the Monument planning area.

Climate Change

Issue Number: PP-ID-CRATERS-17-01-19

Organization: WildLands Defense

Protester: Katie Fite

Issue Excerpt Text:

We Protest these climate analysis deficiencies of the EIS process that the FEIS DID NOT rectify.

Issue Number: PP-ID-CRATERS-17-02-4

Organization: Western Watersheds

Protester: Kenneth Cole

Issue Excerpt Text:

Finally, the ARMPA failed to address the

impacts of climate change to the sage-grouse, and the PMMPA/FEIS does not remedy this omission. The PMMPA/FEIS for Craters of the Moon NM does discuss the relative levels of methane emissions of the alternatives (PMMPA/FEIS at 267-269) but does not address the other aspects of livestock grazing's harm to carbon-sequestering soils, plants, or how livestock grazing may interact and exacerbate the climate stress that sage-grouse are under. This issue was raised in Comment 22, but BLM's response to the comment was no substantive or sufficient.

Summary:

The Craters of the Moon National Monument and Preserve PMMPA/FEIS is deficient to climate analysis particularly the interaction between livestock grazing and Greater Sage-grouse.

Response:

The Craters of the Moon National Monument and Preserve PMMPA/FEIS considers and analyzes the potential impacts from climate change on the public lands as discussed in Section 3.3.5 of the FEIS. Section 4.3.1.4 discusses the Cumulative Effects of climate change to GRSG under the "Future Anticipated Trends" section on p. 280.

Section 4.3.1.3 of the FEIS discusses cumulative effects *of* climate change to vegetation p. 278, while Section 4.3.1.14 discusses the cumulative effects *to* climate change. This analysis concludes that none of the alternatives increase greenhouse gas (GHG) emissions. "Idaho Guidelines for Rangeland Health" are applied during the permit renewal process at the implementation level. Although this plan amendment is of limited scope to specifically address livestock grazing, the original 2007 MMP was amended by ARMPA, which included management objective VEG-1 to accommodate for any future effects of climate change. (See pg. 334 Appendix C of the draft plan amendment.)

Section 4.3.1.4., "Wildlife and Fish, Including Special Status Species", addresses how livestock grazing could harm carbon-sequestering plants and soils, and how this could ultimately complicate GRSG habitat (p. 279-281). "Uses and activities on BLM-managed lands would address wildlife and fish resource objectives by seeking to reduce disturbances of both wildlife and fish and their habitats. For example, livestock grazing management must conform to Standards, which include wildlife and fish habitat requirements. Implementation of reasonably foreseeable conservation measures designed to protect sage-grouse habitat could also benefit wildlife and fish resources" (p. 281).

The PMMPA/FEIS considers a variety of grazing systems and the impacts resulting from them. The BLM's Record of Decision will reflect the management that best addresses the agency's multiple use mandate. (Refer to PMMPA/FEIS Vol II at page 33.) The PMMPA/FEIS also considers and analyzes the potential impacts of public land management provided for under the alternatives, which contribute to climate change in the PMMPA/FEIS.

The BLM complied with climate change analysis requirements in developing the PMMPA/FEIS.

Special Status Species

Issue Number: PP-ID-CRATERS-17-01-10
Organization: WildLands Defense
Protester: Katie Fite

Issue Excerpt Text:

We Protest the great failure to provide a necessary baseline of habitat use and occupancy and population viability for all sensitive species in the Monument and surrounding lands. FEIS 102, Table 3.5 Sensitive Species - Why isn't sage grouse in this list?

Issue Number: PP-ID-CRATERS-17-01-11
Organization: WildLands Defense
Protester: Katie Fite

Issue Excerpt Text:

We Protest BLM failing to take a hard look at the serious adverse and irreversible effects of all alternatives on harming pygmy rabbit habitats and population viability.

Issue Number: PP-ID-CRATERS-17-01-7
Organization: WildLands Defense
Protester: Katie Fite

Issue Excerpt Text:

The AMS identified 211,700 acres of breeding habitat. Habitat assessments are old - from 2012 and 2013. Only 20,766 (16%) acres of habitat were found suitable (AMS Table 2.5). 59,432 acres were found to be marginal. It is impossible to understand that has now morphed in to the sagebrush habitat claims of the FEIS. We Protest the lack of analysis and clear science-based

rationale.

Issue Number: PP-ID-CRATERS-17-02-12
Organization: Western Watersheds
Protester: Kenneth Cole

Issue Excerpt Text:

The PMMPA/FEIS also does nothing to address the late brood-rearing period of conflict between livestock and sage-grouse and the recommendations of the best available science to remove grazing between August 1 and November 15 and to leave sufficient residual herbaceous cover for spring nutritional needs. See Comment 22 vii. Despite being apprised of this, the Craters PMMPA/FEIS provides no analysis of this management recommendation.

Issue Number: PP-ID-CRATERS-17-02-2
Organization: Western Watersheds
Protester: Kenneth Cole

Issue Excerpt Text:

Additionally, WWP protests the failure to identify a spatial parameter for monitoring livestock impacts. In addition to the ARMPA's deficiencies in identifying and implementing a schedule for addressing grazing impacts, nowhere does the ARMPA or the PMMPA/FEIS commit to a spatial parameter for measuring the habitat objectives. The underlying decisions of the approved RMPA are common to all alternatives in the PMMPA (PMMPA/FEIS at 44), but none of the ARMPA's habitat

objectives prescribe a distance-to-lek parameter for monitoring breeding habitat, nor does the Craters PMMPA. This fails to ensure the resources of the monument will be protected and that the application of the ARMPA will be meaningful when applied at a site-specific level. This issue was raised in comments (Comment 26 viii, xi PMMPA/FEIS at 116-117) and BLM simply referenced the delineation of habitat, but did not commit to a monitoring plan within the revised draft. BLM's Special Status Species Policy (Manual 6840) directs the agency to ensure, "BLM activities affecting Bureau sensitive species are carried out in a way that is consistent with its objectives for managing those species and their habitats at the appropriate spatial scale."

Issue Number: PP-ID-CRATERS-17-02-6

Organization: Western Watersheds

Protester: Kenneth Cole

Issue Excerpt Text:

The Special Status Species Policy, Manual 6840, defines the role of BLM managers as, "Ensuring that when BLM engages in the planning process, land use plans and subsequent implementation-level plans identify appropriate outcomes, strategies, restoration opportunities, use restrictions, and management actions necessary to conserve and/or recover listed species, as well as provisions for the conservation of Bureau sensitive species." Here, the land use plan does not identify appropriate future steps and merely defers them until later. Manual 6840 does not say "land use plans or subsequent implementation-level plans," it says "and." This means that identification of appropriate use restrictions is required within land use plans as well as subsequent plans. Thus, the BLM's repeated deferral of season of use restrictions, utilization restrictions, habitat objectives, etc. is a failure under its own policy.

Summary:

The Craters of the Moon National Monument and Preserve PMMPA/FEIS violates the requirements of the Federal Land Policy and Management Act (FLPMA) regarding special status species because:

- it fails to provide a necessary baseline of habitat use and occupancy and population viability for all sensitive species in the planning area, including for the GRSG;
- it fails to take a hard look at the adverse and irreversible effects of all alternatives on harming pygmy rabbit habitats and population viability;
- it does not comply with BLM policy manual MS-6840 (Special Status Species Management) by failing to ensure "that BLM activities affecting Bureau sensitive species are carried out in a way that is consistent with its objectives for managing those species and their habitats at the appropriate spatial scale" and by failing to identify appropriate future steps for use restrictions, utilization restrictions, habitat objectives, etc. and deferring them until later; and
- it fails to provide a clear, science-based rationale in its analysis regarding GRSG habitat and fails to address the late brood-rearing period of conflict between livestock and GRSG by failing to adhere to the recommendations of best available science to remove grazing between August 1 and November 15 and to leave sufficient residual herbaceous cover for spring nutritional needs.

Response:

A primary objective of the BLM Special Status Species policy is to initiate proactive conservation measures that reduce or eliminate threats to Bureau sensitive species to minimize the likelihood of and need for listing of the species under the ESA (BLM Manual Section 6840.02.B). However, the BLM does not have the authority to determine if listing under the Endangered Species Act is warranted for a particular species, or if the management outlined in the Craters of the Moon National Monument and Preserve PMMPA/FEIS avoids the need for listing of Bureau sensitive species under the Endangered Species Act.

Based on the science considered and impacts analysis presented in the Craters of the Moon National Monument and Preserve PMMPA/FEIS, the management proposed in the Craters of the Moon National Monument and Preserve PMMPA/FEIS satisfies BLM's intent to manage the public lands in a manner that avoids the need for listing of Bureau sensitive species under the Endangered Species Act.

For example, Chapter 3 (Affected Environment, p. 72) of the Craters of the Moon National Monument and Preserve PMMP/FEIS describes in detail the living and non-living components that may be affected by the actions described in the alternatives and where appropriate, the management challenges for resources and resource uses in the planning area. This chapter serves as the baseline against which impacts of the alternatives are analyzed. Table 3.5 in this chapter lists the special status animal species that are known or reported in the planning area. The greater sage-grouse, pygmy rabbit, and sage grouse are included in this table and the current data known regarding the baseline of habitat use and occupancy and population viability for these species are discussed in this chapter. In Chapter 4 (Environmental Consequences, p. 139), the types and magnitude of impacts are identified and quantified for each alternative, to the extent practicable, based on the existing environmental conditions as identified in Chapter 3. The impacts of livestock grazing on sensitive species and the management of those impacts are also discussed in this chapter. Chapter 4 notes that "sage-grouse are an umbrella or indicator species for other sagebrush-associated special status wildlife including pygmy rabbits and passerine birds such as Brewer's sparrow, sagebrush sparrow, and loggerhead strike [Hanser & Knick, 2011]. Therefore, actions taken to benefit sage-grouse are assumed to result in benefits to other sagebrush-associated species." Sage-grouse habitat and consideration of late brood-rearing conflicts with livestock grazing are also considered and discussed in Chapter 4 as well as in Appendix C (Idaho and Southwestern Montana Greater Sage-Grouse Approved Resource Management Plan Amendment Attachment 1 – Chapter 2, and Required Design Features; p. 331), Appendix F (Greater Sage-Grouse Habitat Assessment Framework, p. 387), and Appendix G (Greater Sage-grouse Occupied Seasonal Habitat Methodology on Craters of the Moon BLM National Monument Lands, p. 391).

A primary objective of the BLM Special Status Species policy is to initiate proactive conservation measures that reduce or eliminate threats to Bureau sensitive species to minimize the likelihood of and need for listing of the species under the Endangered Species Act (BLM Manual Section 6840.02.B). Such measures are taken through the application of Standards and

Guidelines for Grazing Administration (43 CFR 4180.2) and the National Sage-Grouse Habitat Conservation Strategy, among other pertinent laws, regulations, and policies. The impacts from livestock grazing on vegetation under the proposed plan alternative would be based on management actions chosen depending on the level of risk as shown in table 2.2 (see Chapter 2, Section 2.6, Table 2.2, row 4, pp. 60-61). The management actions proposed under the alternatives in this table summarizes all new management actions, which would be in addition to the current management actions in the existing plan. If, through monitoring, management actions are shown to be ineffective during implementation, then additional measures would be considered. Although a coordinated monitoring plan has not been established by the BLM for the planning area, numerous formal and informal monitoring efforts are ongoing (livestock grazing, recreation, special status wildlife species, caves, emergency stabilization and rehabilitation, and fuels treatments). Additional monitoring needs have been identified in the Craters of the Moon National Monument and Preserve Management Plan Implementation Strategy which was compiled in 2007 and informally updated since that time. Monitoring continues to be an important aspect of managing resources, including special status species, in the Monument and will be considered through implementation of the original plan decisions as well as new or updated decisions in the plan amendment to determine effectiveness of management actions.

The management proposed in the Craters of the Moon National Monument and Preserve PMMPA/FEIS complies with BLM's Special Status Species policy.

Livestock Grazing

Issue Number: PP-ID-CRATERS-17-02-13

Organization: Western Watersheds

Protester: Kenneth Cole

Issue Excerpt Text:

The PMMPA contains very little site-specific information about the allotments at all, not once providing the acreages of Sagebrush Focal Areas (SFA), Priority Habitat Management Areas (PHMA), General Habitat Management Areas (GHMA) or Important Habitat Management Areas (IMHA) that occur on each allotment, nor providing any analysis of where these areas overlap with known rangeland health issues. Thus, the overarching plan is inadequate to inform the public and the decision-makers of the real impacts BLM's proposed actions will have. The ARMPA provides would "prioritize the review and processing of grazing permits/leases in SFAs followed by PHMAs" but the modification of grazing permits in GHMAs receives no priority. ARMPA at ES-14. Because the PMMPA/FEIS doesn't identify the allotments and their respective classes of acreage as designated under the ARMPA, it fails to disclose information relevant to the plan at hand. WWP provided Map 1 with its comments on the Draft Plan; BLM failed to address this as a substantive issue or include a similar map in the final. See Figure 3, below.

Issue Number: PP-ID-CRATERS-17-02-5

Organization: Western Watersheds

Protester: Kenneth Cole

Issue Excerpt Text:

BLM's claims– "The PMMP Amendment/FEIS specifically considered the allocation of AUMs within the Monument and the availability of Monument lands for grazing," (PMMPA/FEIS Vol. II at 4) are disingenuous in light of the agency's failure to identify the specific allotments where retirement would be beneficial for sage-grouse. BLM's response to comments (23 xxvi) states, "Grazing permit retirement is provided for in Alternatives B, C, and E." PMMPA/FEIS Vol. II at 90. But the PMMPA/FEIS language differs significantly from the direction in the ARMPA where it says, under Alternative B, "AUM reductions would be implemented during the grazing permit renewal process in order of priority based on current policy, by 1) Meeting rangeland health standards, 2) Closing the areas identified in Alternative B and reducing the corresponding allotment AUMs proportionately, 3) adjusting AUMs to reflect allotment boundary adjustment removing Kimama Allotment from the Monument, 4) Accepting voluntary reductions or relinquishments from permittees...." PMMPA/FEIS at 62-3, emphasis added. This is the same language under Alternative E but not Alternative C, as the BLM claims. Id. WWP protests the misinformation in the response to comments and the failure to incorporate the language of the ARMPA or NTT report directly and/or analyze the difference in the management documents herein.

Summary:

The BLM incorrectly claims in its response to comments on the Draft MMPA/DEIS that grazing permit retirement is considered under alternatives B, C, and E. Additionally, the PMMPA/FEIS fails to directly incorporate the ARMPA and NTT report language, and in regards to Greater Sage-grouse, is inadequate to inform the public and decision-makers of the proposed plan.

Response:

The BLM acknowledges the error in response to comment letter 23 xxvii. Grazing permit retirement was analyzed only under Alternative B, and not alternatives B, C, and E, as stated. This clarification will be made in the ROD.

While the FEIS does not provide acreages of GRSG habitat for each grazing allotment in the planning area, Section 3.2.4 does provide a detailed description of the affected environment in regards to sage grouse. For example, Figure 3.10 conveys Greater Sage-Grouse habitat management areas on monument lands. Page 104 of the FEIS also provides acreage percentages for each habitat type within the monument area. This information can then be compared to other figures, such as Figure 1.4, Allotment Administration, or Figure 3.7, Biotic Integrity. Further, impacts of livestock grazing on special status species, including sage grouse, are discussed in Section 4.2.4 of the FEIS. For additional response to protests concerning Greater Sage Grouse, please see sections within this protest report titled “Impacts Analysis – Wildlife” or “Sensitive Status Species”.

ACECs

Issue Number: PP-ID-CRATERS-17-01-21

Organization: WildLands Defense

Protester: Katie Fite

Protest of this FEIS. We Protest this failure to consider a reasonable range of ACECs, or even a single ACEC designation alternative.

Issue Excerpt Text:

BLM must fully assess ACECs in this process. DEIS p. 41. Stated that several proposed ACECs were analyzed in the 2007 MMP but were not designated at that time. ACECs have been deemed outside the scope of this effort, and proposals for ACEC nominations were not solicited during public scoping. For these reasons, an ACEC is not analyzed. ACECs must be fully be considered as part of this proposal. WLD Incorporates by reference ACEC proposals submitted during the 2007 Plan process as well as the GRSG ARMPA process into our

Issue Number: PP-ID-CRATERS-17-01-4

Organization: WildLands Defense

Protester: Katie Fite

Issue Excerpt Text:

Laidlaw, Paddelford, Larkspur Park, Little Park meet the definition of kipuka. We Protest the failure designate all kipukas as ACECs and to thoroughly evaluate a full range of alternatives and grazing removal from all kipukas.

Summary:

The Craters of the Moon National Monument and Preserve PMMPA/FEIS fails to:

- assess new ACECs in the planning process or solicit their nomination by the public; and
- consider one or a range of ACEC alternatives.

Response:

Nomination and analysis of potential ACECs was beyond the scope of this planning effort because it did not meet the Purpose and Need to consider the effects of grazing, as explained in EIS section 1.2 Further, a protesting party correctly notes that the 2007 MMP EIS analyzed potential ACECs. For the current MMPA planning effort, the BLM properly noted in MMPA/FEIS section 1.4.5: “While the BLM 1613 – Area of Critical Environmental Concern Manual (1988) provides guidance on how the public can nominate ACECs, in this case it’s considered outside the scope of this Final MMP Amendment/EIS because it does not address the purpose and need [set forth in section 1.2].” The analysis of ACEC nominations took place during the 2007 MMP planning process, and subsequently the 2015 GRSG ARMPA considered an ACEC nomination for the protection of sage-grouse that included part of the Monument. That nomination was therefore not considered again in this planning effort, nor were other suggested ACECs.

National Conservation Lands

Issue Number: PP-ID-CRATERS-17-01-23

Organization: WildLands Defense

Protester: Katie Fite

Issue Excerpt Text:

We Protest the FEIS failure to make ALL the GRSG habitats in the Monument a Priority - in order to comply with the Monument Proclamation. (Compare this to the Idaho Desert and other categories which were dreamed up under the ID Gov. Otter Plan to whittle down habitat acres of most concern and management measures. (As the sage-grouse habitat has continued to shrink and populations decline, BLM has capitulated state desires to cut into habitat protections even more. This violates FLPMA and the Monument Proclamation. It must be reversed in this EIS process, and all GRSG habitats must be managed as Priority Habitats, and restoration measures must be adopted with concrete sites and acreages to turn around the trend of disappearing habitats of importance and ever-shrinking populations The real reason BLM refuses to address restoration is that it would take out many of the very harmful crested wheatgrass seedings that agency hides behind in claiming there is “forage” available to support the paper cows and sheep.

Issue Number: PP-ID-CRATERS-17-02-8

Organization: Western Watersheds

Protester: Kenneth Cole

Issue Excerpt Text:

The adoption of the DFC also unlawfully elevates grazing over habitat protection, in contrast to the Proclamation and the guidance for NLCS lands set out by the agency. FLPMA’s definition of “multiple use” calls for “harmonious and coordinated management of the various resources without permanent impairment of the productivity of the land and the quality of the environment with consideration being given to the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output.” See 43 U.S.C. § 1702(c)(emphasis added). Retaining livestock grazing as a “Desired Future Condition” disregards the mandate to consider the relative value of the resources, which here include specially-designated national monument lands that are intended to protect, conserve, and recover sage-grouse.

Summary:

The Craters of the Moon National Monument and Preserve PMMPA/FEIS is inconsistent with the Monument Proclamation because it:

- fails to protect Monument Objects such as Greater Sage-grouse habitats by designating them as Priority Habitats; and
- retains livestock grazing as a “desired future condition” rather than considering the relative value of the resources so as to protect, conserve and recover the Greater Sage-grouse.

Response:

As noted on MMPA/FEIS Section 1.2.1 page 5, the following list of Monument Objects evolved from the original Proclamation, legislation, and the public planning process associated with the 2007 MMP. Monument Values and Objects developed through these processes - and treated as such in the EIS - comprise the following:

- All volcanic features in the Monument, including, but not limited to kipukas, craters, cones, lava flows, caves, and fissures;
- The Great Rift;
- Wilderness and Wilderness Study Areas;
- Scenic vistas and great open landscapes;
- Important habitat for Greater Sage-grouse; and
- Historic and traditional relationships with the land including but not limited to traditional ranching, hunting, and all traditional Native American practices.

The list above includes both GRSG and traditional ranching, and the BLM's proposed plan strives to balance and harmonize their mutual coexistence. As noted on Vol. 2 page 78, the direct and cumulative impacts from grazing to Monument objects have been analyzed under all alternatives.

The Proclamation for Craters of the Moon references maintaining vegetation for Greater Sage Grouse. It also states that the BLM shall continue issuing and administering grazing permits or leases on all lands under its jurisdiction. This is fully supported within Manual 6220, National Conservation Lands, "where consistent with the designating legislation or proclamation, livestock grazing may occur within Monuments and NCAs" and "where grazing management practices will be implemented in a manner that protects Monument and NCA objects and values unless otherwise provided for in law." The Proclamation does not place priorities and the FEIS remains consistent with Federal Lands Policy and Management Act's definition of "multiple use" and addresses the calls for "harmonious and coordinated management of the various resources" See 43 U.S.C. § 1702(c).

As indicated on page 104 of the final Monument Management Plan amendment, the BLM and USFS identified habitat management areas from the ID/SW MT Sub-regional greater sage grouse EIS. Habitat management areas in the Monument include 52% (142,200 acres) classified as Priority Habitat Management Areas; 44% (121,400 acres) classified as Important Habitat Management Areas; 4% (10,800 acres) classified as General Habitat Management Areas, and 52% (142,100 acres) classified as Sagebrush Focal Areas. The classification as a priority habitat area helps distinguish the conservation value of the area. The Monument Management Plan amendment establishes the habitat management areas from numerous conservation planning and scientific documents including the 2015 Sage-grouse Habitat Assessment Framework: Multi-scale Habitat Assessment Tool, the 2004 BLM National Sage-Grouse Habitat Conservation Strategy, the 2011 Sage-grouse National Technical Team Report, the State Wildlife Agency Greater Sage-Grouse Conservation Plans, the U.S. Fish and Wildlife Service Sage-grouse

Conservation Objectives Team Report, the Western Association of Fish and Wildlife Agencies Greater Sage-Grouse Comprehensive Strategy, and the USGS Open-File Report 2013-1098.

As stated on the Craters of the Moon MMPA/FEIS Vol. 2 p. 150, “All alternatives promote and protect the Monument values listed in the Proclamation.” The Proclamation also references maintaining vegetation for Greater Sage-grouse and also states the BLM will continue issuing and administering grazing permits or leases on all lands under its jurisdiction. Recognizing the Proclamation addresses both Greater Sage-grouse habitat and grazing, the BLM’s proposed plan strives to meet the intent of multiple use as defined in the Federal Lands Policy and Management Act. As noted in the PMMPA/FEIS, Vol. 2, page 78, the direct and cumulative impacts from grazing to monument objects have been analyzed under all alternatives. As stated in the PMMPA/FEIS, Vol. 2, page 97, the Desired Future Conditions for the Monument were set in the 2007 Monument Management Plan. This plan recognizes the myriad of Monument values, and provide for management of land uses to achieve the desired conditions over time. The BLM has properly analyzed impacts on Monument objects, such as Greater Sage Grouse while taking adequate steps to allow traditional grazing practices to continue. This does not require designation of all GRSG habitats as “priority habitats”.
