APPENDIX L

COMMENTS ON DRAFT PLAN/EIS AND RESPONSES

This appendix contains all 570 substantive comments received on the Draft Management Plan/EIS during the 90-day comment period (April 30 to July 29, 2004). Specific responses to those comments, prepared by the NPS and BLM, are also shown. If the text of the Draft Plan/EIS was changed in response to a comment, this is also noted.

The reader is also referred to Chapter 5 of this document, where the public involvement and comment analysis process is described in greater detail. Additionally, comments and responses (individually listed in this appendix) are summarized in Chapter 5 by resource topic, providing a more concise analysis of the public input received on the Draft Plan/EIS. Information in that chapter also describes consultation with Native American Tribes and coordination with other government agencies.

During the comment period, the BLM and NPS received 153 individual letters and 975 form letters commenting on the Draft Plan/EIS. The 570 substantive comments from those letters were identified, as required by NEPA (40 CFR 1503.4), the BLM NEPA Handbook (H-1790-1), and the NPS Director's Order 12 Handbook. Substantive comments are those which challenge the accuracy of the analysis, dispute the accuracy of information, suggest different viable alternatives, or provide new information that makes a change in the proposal. In other words, they raise, debate, or question a point of fact or policy. Comments in favor of or against one or more alternatives or comments that only agree or disagree with policy are not considered substantive, although they often provide important and valuable information or opinion.

This appendix lists each individual substantive comment received along with the specific response to that comment and references to any text changes made as a result. In the column to the left of the comment and response is a reference to the number of the comment letter and the corresponding comment in that letter. Comments and responses are grouped by resource topic, as analyzed in the EIS. Unless otherwise noted, page numbers cited in the comments and responses refer to the Draft Plan/EIS, not the Proposed Plan/FEIS.

Topic Cultural Resources

Letter No./ Comment No.	Comment	Response
4 / 001	On page 110, Prehistoric and Historic Sites: The first sentence in this section states that there are 346 known, recorded cultural resources in the Monument. According to our records, 1149 archaeological sites have been recorded within the Monument.	The agencies conferred with the State Historic Preservation Office and agency GIS specialists to calculate the number of recorded sites within the Monument given the most current information available. The text on page 110 has been edited as a result. It now reads, "Over 500 known, recorded cultural resources…"
28 / 001	The Power County Historical Society met on the 23rd of June. We discussed your management plans. We are in favor of Alternative D, which is your preferred. We wish to express our interest in being a gateway facility at our new museum.	Thank you for your comment.
4 / 002	Pp. 193-194: While we are not opposed to Alternative #4, we question the statement at the bottom of p. 193 that begins with: "Because there would be no major adverse impacts on a resource or value whose conservation is…" We wonder how the NPS and BLM can make this statement when so little is known about the number and nature of sites within the Monument (only 5% of the Monument has been surveyed), and the effects of increased visitor use. This, coupled with insufficient professional staff to monitor effects and identify historic properties, leaves much to be learned about the fate of Monument's cultural resources.	The section on Pages 193-194 refers to "impairment" of Monument cultural resources. From the information we presently have, we can extrapolate that the vast majority of cultural resources within the Monument lie within the least accessible areas of the Monument and are naturally protected to some extent by their remoteness. It is understood that Section 106 review would be required for all implementation actions pursuant to this DEIS and major adverse effects would be avoided where at all possible.
126 / 002	The document provides sufficient information regarding issues of concern brought up during scoping and clear figures related to each alternative. However, EPA recommends including additional information in the EIS regarding cultural resources and water resources impacts. The EIS discusses cultural resources and the consultation that occurred and that long term cultural resource impacts would not occur. EPA recommends further discussing specific issues that were identified by tribes in the consultation process and how any issues would be addressed. This will assist the public in understanding how the consultation process affects management decisions for not only Section 106 of the National Historic Preservation Act identified resources, but also tribal resources related to traditional sites, sacred sites, travel routes, and traditional hunting.	Issues of tribal concern are addressed in the Native American Treaty Rights, Trust Resources and Ethnographic Resources sections of the document p. 111-112 and 194-200. In addition, the government to government relationship with Tribes is expressed in letters from the Shoshone-Bannock Tribes, printed in Appendix K.

Topic Cultural Resources

Letter No./ Comment No.	Comment	Response
107 / 003	All historic signs identifying historic locations should be erected in order to identify those points as established from prior use. For instance, Little Blowout is now identified as Big Blowout, this is incorrect. All those places should be identified as historic. For instance, some playas are identified by names of BLM personnel, this is not historic.	A Comprehensive Interpretive Plan would be developed for the Monument after this Proposed Plan/FEIS is put in place and these issues will be addressed at that time.
4 / 003	Outfitters and guides should receive some training in cultural resource laws and ethics.	Thank you for your suggestion.
4 / 004	Finally, we are pleased to learn that, under Alternative 4,the National Park Service (NPS) and Bureau of Land Management (BLM) plan to support a Section 110 program at the Monument that will include on-going Section 110 survey, public education, interpretation, monitoring, and the preparation of a Cultural Resource Management Plan. As you know, however, the BLM has two archaeologists for the entire Shoshone, Idaho Falls, and Pocatello districts; the National Park Service has no archaeologists is southern Idaho. With such limited staff and so many acres, we question how your agencies can fulfill the cultural resource commitments of Alternative 4 without additional professional staff. We urge you to include as part of this GMP and EIS a parallel commitment to hire the professional staff needed to implement this program and fulfill the obligations outlined in this document.	A discussion of staffing is outside the scope of the DEIS. The DEIS seeks to set the future management direction and goals for the Monument, achievements to strive for. Once this direction is in place, it will support future managers' requests for additional funding and staff to accomplish these goals.
123 / 034	The DEIS discussion of ongoing activities fails to mention the array of livestock impacts to cultural sites that must be addressed – trampling, disturbing site stratigraphy, breaking artifacts, causing soil erosion exposing artifacts to surface looting, introducing weeds and altering fire cycles so archaeological sites are damaged by intense fires.	The Impacts to Cultural Resources section discusses the impacts of livestock and wildfires/wildfire suppression on archaeological sites on pages 188-193.
123 / 065	Why are you proposing to inventory only 10% of theMonument for cultural resources? How can you decide which roads to not upgrade if you have not conducted these inventories?	The plan proposes Section 110 inventory on 10% of the Monument (p. 186). Section 110 of the National Historic Preservation Act refers to non-project related inventory. Section 106 of the National Historic Preservation Act refers to project related inventory and is always completed for federal actions, as mentioned on p. 186. Any road construction project would be subject to Section 106 inventory and review.

Topic Water Resources

Letter No./ Comment No.	Comment	Response
11 / 001	This document states that because of the short seasonal periods during which standing water is present in playas, the impacts of livestock use-- contamination with fecal coliform and nutrients from manure deposits-- are negated by the eventual disappearance of surface water. Disappearance of water does not negate the problem, because although the water may not be present year-round, nutrient sources (deposited feces) could remain until the following wet season allows them to remobilize. The USGS recommends the statement be modified to remove the word "negated."	We agree. The word negated has been deleted from this section.
2 / 002	On page 242, you mention that "intense recreational use of ice cave pools could create moderate changes in nutrient concentrations and bacteria levels." Could you expand what you mean by 'ice cave pools?' The draft refers to the same text for each alternative. Are there known ice cave pools and what gives the impression that they will be visited recreationally?	Ice cave pools are pools of water melted from ice deposits on the floor of caves. The ice deposits prevent the melted water from draining away through the fractured basalt. There are dozens of known ice caves with pools of water during the warm seasons of the year. Several of these caves are on developed trails and are visited recreationally by many people each year. Other ice caves are more remote but increased recreational use could lead to increases in nutrient and bacteria concentrations.
126 / 003	The Monument area is inherently dry and the limited supply of water and water quality are critical elements for sustainability of wildlife and other natural resources, which is a component of the carrying capacity (a character used by the NPS for ensuring no excessive damage to the environment) of the area as discussed in the EIS. The EIS discusses how Alternative D "could accommodate more livestock water developments," and that if these are developed than water quality in playas could be impacted. EPA supports long term water quality and protection of playas and all other water resources in the area. EPA recommends further discussing what measures will be taken to ensure that grazing will not adversely impact water resources, how this will be monitored, and how management direction will be adapted.	BLM does not identify playas as riparian areas according to the riparian area definition in the BLM Technical Reference TR 1737-9 and 11. TLM presently has no data or standards to evaluate playas. Therefore, BLM will use the professional judgment to determine if the standards for rangeland health are being met or we are moving towards meeting them, that the health of the playas will also be met. The Draft EIS does not alter grazing management so the impacts of grazing on water quality are substantially the same for all alternatives. The Draft EIS page 172) concludes that livestock grazing is expected to be long term with intensity ranging from negligible to potentially major in local sites depending upon the concentration and duration of livestock use.
123 / 132	BLM's proposed grazing regulation changes would hand over much of the control of public lands to permittees. Under these changes, permittees would be granted partial ownership of water projects. The DEIS must analyze these foreseeable impacts.	The new regulations are not in effect at this time. It is policy that all BLM EIS follow the Code of Federal Regulations. The proposed grazing regulations do not change BLM's authority to manage public lands.
123 / 176	DEIS at 282. Have water rights filings been made on all waters within the Monument? If not, when will this occur, and why has it not been done? Please provide a list of all water rights filings, with geographic locators. How will the waters of the Monument be protected from aquifer depletion?	A summary of the status of water rights within the Monument may be found on page 99 of the Draft EIS.

Topic Geological Resources

Letter No./ Comment No.	Comment	Response
104 / 003	… It is difficult to comprehend why the impacts associated with this alternative are noted as ranging from "negligible to potentially major" when this is the same designation ascribed to Alternative D, even though it offers no road closures and increases the Passage Zone. Either the impacts associated with Alternative C should be downgraded, or the impacts associated with Alternative D should be upgraded to highlight the significant differences between these alternatives.	As noted on page 157 in the geology section of Chapter 4, "Alternative C would cause the fewest impacts on geologic resources of all the alternatives." In any of the alternatives, however, individual features could have impacts ranging from negligible to major. In the Proposed Plan/FEIS we have adopted an expanded Pristine Zone similar to Alternative C, which will afford the most passive protection through limited access.
165 / 018	Page 67 -Table 8; Summary of Impacts; Geological Resources: The Service believes that the maintenance and improvement of roads, along with the reduction of acres in the Pristine Zone, would result in an increase of damage from visitors and would compromise restoration efforts, contrary to the statement made herein.	Road improvements have never been mandated by falling within a particular zone description; any improvements will be driven by management, restoration, and resource protection needs. Further, in the Proposed Plan/FEIS the amount of Passage Zone has been decreased over what was in the original Alternative D and the Pristine Zone has been expanded to be closer to Alternative C. Off-site interpretation will still be emphasized in the Proposed Plan/FEIS for all areas other than the developed portion of the Monument.
123 / 068	This is deeply flawed, especially the analysis of Alt. D. Livestock trampling displaces and alters surface lava features, causes windblown weeds to obscure surfaces of lava formations, increases dust coating on lava surfaces. There is no basis for Alt. D to be claimed "beneficial" to geological resources because of its "aggressive" restoration – while livestock disturbance continues to be maximized. Plus, Alt. D does not emphasize off-site recreation experience as it leaves almost all roads open, thus encouraging motorized use through nearly all sagebrush habitats.	As noted on page 157 in the geology section of Chapter #4: "Grazing and associated trailing would result in the same negligible to minor adverse impacts described for other alternatives, since grazing would not be managed any differently under this alternative." Thus, grazing can not be characterized as maximized under Alternative D and causing more damage to geologic features. Contrary to your statement, Alternative D does emphasize off-site interpretation, thus not attracting people into the expanded Monument. In the Proposed Plan Alternative D incorporates a Pristine Zone similar to Alternative C and there will be some miles of road closure because of the zone description.
123 / 139	How does wind-blown livestock water in dust affect geologic surfaces? How does being covered by windblown livestock-caused weds affect geologic surfaces, lichen covering, weathering, etc.? How do windblown herbicides (including transported on soils) affect lichens, and appearance of geologic surfaces? The analysis of grazing effects and road effects on geologic resources ids greatly under-estimated in the analysis.	Dust can coat geologic formations until a precipitation event removes it. Dust can also infiltrate into cinders and be deposited in or fill cracks providing more growth medium for plants. No data is available as to rates of deposition in the Monument. In comparison to the aftermath of fire where huge volumes of dust/soil are liberated (eroded and re-deposited elsewhere), these impacts would fall within the range of normal variability and are, therefore, considered to have a negligible impact on geologic processes and features.

Topic Geological Resources

Letter No./ Comment No.	Comment	Response
123 / 143	The DEIS admits that "an individual geologic feature could suffer a major impact," yet claims that the impacts would be localized. This is essentially saying it is ok to irreparably harm an area, as the impacts are "localized" to the particular feature or area that is ruined. This is not management that is compatible with the Monument Proclamation. As the DEIS finds that Alternative C would provide the MOST protection to geologic features, it is impossible to understand why you would not choose the protections of this Alternative as your course of action, given the prominence of geologic features in Monument designation. Plus, please provide a detailed rationale for claiming that Alt. C would only have "slightly" fewer adverse impacts. We believe you have exhibited bias throughout the analysis of Alt. C in underestimating any beneficial impacts related to it.	As noted on page157 in the geology section of Chapter 4, "Alternative C would cause the fewest impacts on geologic resources of all the alternatives." In any of the alternatives, however, individual features could have impacts ranging from negligible to major. In the Proposed Plan/FEIS we have adopted an expanded Pristine Zone similar to Alternative C, which will afford the most passive protection through limited access.
123 / 177	DEIS at 285 claims that geologic features may perhaps be the over-riding purpose of the Monument, yet in the DEIS analysis of environmental effects, it allows for degradation of geological resources as part of its Preferred Alternative, and all Alternatives assessed.	Short of keeping people out entirely, it is not possible to eliminate all anthropogenic induced degradation. With 1,100 square miles in the Monument it would not be possible, even with a vastly increased ranger presence, to stop all adverse activity. In the Proposed Plan/FEIS we have adopted an expanded Pristine Zone similar to Alternative C, which will afford the most passive protection through limited access.

Topic Soils

123 / 030	The DEIS claims that soils would be protected from accelerated or unnatural erosion – yet no data on soil erosion hazard, current soil conditions, zones of active erosion, etc. has been presented. No data has been collected and presented on livestock impacts causing soil compaction, loss of microbiotic crusts, or accelerated and unnatural erosion.	The ID Team felt that the level of detail regarding soils data was adequate to make informed decisions at the RMP/GMP level of analysis. Additional information found in the NRCS Soil Surveys will be used for implementation- and project-level planning.
123 / 069	The assessment of soils is narrowly constrained, as it assesses no alternative that alters livestock soil disturbance. Likewise, Alt. D on soils is deeply flawed, and it fails to recognize the degree of disturbance associated with grazing and even more livestock developments that would be permitted in many of the sagebrush areas.	The ID Team felt that the level of detail and accuracy of impacts analysis, on the topic of soils, was adequate to make informed decisions at the RMP/GMP level of analysis. Additional information found in the NRCS Soil Surveys will be used for implementation- and project-level planning.

Topic Soils

Letter No./ Comment No.	Comment	Response
123 / 071	The mix of status quo grazing and extensive treatment disturbance plus use of herbicides or fire on unknown acreages will harm air quality. For example, in the Idaho Falls BLM Big Desert Fuelbreaks project currently underway along the Arco-Minidoka road, BLM is using a long-term persistent herbicide to kill big sagebrush. This is not "short term". There are no efforts to address the destruction of microbiotic crusts, which help protect the soil form both wind and water-caused erosion. Plus, as the "restoration" alt. proposes shifting livestock use to other portions of grazed lands while its "treatments" are carried out, the impacts on nearby lands could be significant, and lead to further de-stabilization of soils and dust pollution.	Impacts to soils and biological crusts have been analyzed in DEIS Ch. 4. Impacts of projects on soils and biological crusts will be analyzed in site-specific environmental analyses. See also the discussion regarding the occurrence (or lack of) biological crusts in the Monument in DEIS Ch. 3.
123 / 076	The DEIS fails to adequately characterize the Affected Environment. For example, the DEIS discussion of Soils fails to assess the impacts of livestock disturbance on soils – including estimates of soil erosion with or without livestock grazing, health or condition of microbiotic crusts; impacts of livestock trampling on playa soils, etc. It fails to assess impacts of livestock projects on soils.	The ID Team felt that the level of detail regarding soils data was adequate to make informed decisions at the RMP/GMP level of analysis. General impacts of livestock on soils are analyzed in DEIS Ch. 4. Additional information found in the NRCS Soil Surveys will be used for implementation- and project-level planning.
123 / 098	The Laidlaw Determination found that Standard 4 (Native Plant Communities) and 8 (T&E Species) were not met. EA at 6 described areas of severe wind erosion potential, and severe water erosion potential. Yet, the DEIS ignores erosion assessment, and development of goals, objectives and management actions to protect soils.	See DEIS Ch. 4 for analysis of impacts to soils. Management goals and actions are defined in DEIS p. 25, Management Actions Common to All Alternatives: Soils.
123 / 146	DEIS flaws related to soils correspond to those of the road analysis. Plus, the displacement of soils above the no action Alt. A would be increased dramatically by more improved roads and bladed rights-of-way, more livestock projects in "passage" areas, and much more "restoration" disturbance. Effects of disturbed soils transporting herbicide particles must also be assessed. This could significantly harm adjacent sagebrush-steppe vegetation, kill scenic lichens on lava, etc.	Thank you for your comments. Impacts of the proposed alternatives on soil resources were analyzed in DEIS Ch. 4. Effects of herbicides being transported via soil particles would be analyzed in the Integrated Weed Management Plan and project-level vegetation treatment environmental assessments. The Proposed Plan/FEIS expands the Pristine Zone (as compared to the draft Alternative D) to include almost all of the WSA. These areas would be closed to motorized vehicle use.
123 / 190	Biological crusts must be maintained as a partial shield preventing establishment or spread of invasive exotic species; implement a plan to restore damaged biological crusts; prohibit livestock grazing for at least five years following a fire in areas capable of maintaining biological crusts. Delay return of livestock past five years if significant recovery of the biological crust or native vegetation components has not occurred. More natural fire	Thank you for your comment. We will consider these points in the appropriate implementation- and project-level plans.

Topic Soils

Letter No./ Comment No.	Comment	Response
	conditions must be promoted: reduce or eliminate livestock grazing where historical understory necessary to carry cooler fires has been or could be diminished by grazing; or where historical grass and forb competition to tree and shrub seedling density has been or can be diminished by grazing.	

Topic Vegetation

39 / 001	We feel that the emphasis of Alternative D, protection and restoration, is appropriate for the Monument. However, we would like to see a more "light-handed" approach, as mentioned in Alternative C, in regards to restoration.	All restoration methodologies, including “light-handed” and passive restoration, will be considered for future projects. Environmental Assessments for specific restoration projects will analyze methods relative to zoning within the Monument, as well as existing vegetation condition and desired future conditions (see DEIS, Management Guidelines Common To All Alternatives: Management Actions under Vegetation, Including Special Status Species, and Fire Management).
62 / 001	While I support aggressive weed control, fire management, and restoration, the proposal to further develop roads will actually increase the threat of noxious weeds and fire risk, as well as accelerate damage to wilderness values and geologic features.	Analysis in the DEIS (Ch. 4) acknowledges the risk of increased road improvement relative to weed infestation, fire risk, wilderness values and geologic features. In response to comments such as this the ID team reduced the amount of Passage Zone in the Proposed Plan/FEIS, particularly in Laidlaw Park. The implementation plan for transportation will address road maintenance and improvement within specific areas and zones of the Monument, with consideration to these and other issues.
82 / 001	The EIS offers little or nothing in the way of an action plan that would conserve and/or improve sagebrush habitat and the species dependant upon it in Craters. The preferred alternative would actually lead to further degradation of this important ecosystem because it continues destructive grazing practices and allows existing, roads and trails to remain open.	The preferred alternative was designed specifically to focus on the restoration and protection of sagebrush steppe habitats within the Monument, and to balance public access and other resource uses with this goal. Management actions included in the alternative, including proactive restoration of approximately 80,000 acres of degraded rangeland, are listed on p. 49 of the DEIS. Additional management direction common to all alternatives for vegetation, wildlife, access and travel, and livestock grazing can be found on pp. 25-29 of the DEIS.
95 / 001	I would strongly urge that there be a supplemental EIS to re-examine reduction in livestock grazing and closure of current unnecessary roads to naturally prevent the spread of weed infestations, plus the use of reseeding with ONLY native plants where any restoration is carried out.	The DEIS acknowledges that roads, vehicles, humans, and animals are known vectors to the spread of noxious weeds (DEIS Ch. 3, Discussion on Noxious and Exotic Species, p. 92). A full Integrated Weed Management Program addresses a broad range of prevention, education, and control activities to combat noxious weeds (see DEIS p. 25 under Management Guidelines Common to All Alternatives: Vegetation, Including Special Status Species, and Fire Management). The use of native plants is emphasized in all restoration projects,

Topic Vegetation

Letter No./ Comment No.	Comment	Response
		pursuant to BLM policy and Executive Order 13112, Invasive Species, February 3, 1999, and only native species would be used on projects in the Pristine Zone.
162 / 001	In general, the IDFG supports the management direction outlined in the DEIS. The preferred alternative calls for aggressive restoration efforts on degraded sagebrush,. steppe communities. As the document correctly states, there has been substantial loss and degradation of these communities throughout southern Idaho and we believe the restoration efforts promulgated under the preferred alternative will significantly improve the condition of the targeted areas. In addition, the restoration efforts will provide for large-scale testing of restoration methods, which will allow evaluation of the most effective methods/techniques to use under a variety of circumstances. This, in turn, will improve the efficacy of future restoration efforts on degraded sage-steppe habitats throughout southern Idaho.	Thank you for your comment.
37 / 001	Plus, after reading the DEIS, it now appears that IF BLM's Big Desert Fuelbreaks Project is really implementing part of Alt. B -before the EIS project is anywhere near completion. See, for example, DEIS at 41" proactive fuels mgmt. activities would be undertaken to offset potential effects of increased public use…"	The Big Desert Fuelbreaks Project is outside of the boundaries of Craters of the Moon National Monument and Preserve and therefore is not implementing any aspect of the Draft EIS. Future fuels management projects within the Monument boundary will be analyzed through project-level environmental assessments and will be available for public review.
100 / 002	There should not be any crested wheat grass planted anyplace, especially here. Only native herbage should be replanted. Laidlaw Park should be completely restored with native grasses.	See DEIS p. 25, Management Actions Common To All Alternatives: Vegetation, Including Special Status Species, and Fire Management. Restoration treatments are not necessarily active and can include passive methods, such as temporary rest from livestock grazing, depending on the current condition of the vegetation and desired future conditions. The use of native plants is emphasized in all restoration projects and only native species would be used on projects in the Pristine Zone.
89 / 002	The Preferred Alternative promotes aggressive herbicide, mechanical and fire treatments and seedings without any requirement to address the root causes of ecosystem problems -grazing and roads. Conduct real restoration, relying on passive restoration techniques wherever possible (limit livestock grazing, close roads, remove livestock facilities that are causing weed spread).	Same response as previous comment.

Topic Vegetation

Letter No./ Comment No.	Comment	Response
102 / 002	The Preferred Alternative is misleadingly dubbed a "restoration" alternative by the agencies. It promotes aggressive herbicide, mechanical and fire treatments and seedings without any requirement to address the root causes of ecosystem problems -grazing and roads. There is not even a requirement to seed native plant species following a treatment! Conduct real restoration, relying on passive restoration techniques wherever possible (limit livestock grazing, close roads, remove livestock facilities that are causing weed spread). *** Use only native plants in all seedlings.	Same response as previous comment.
88 / 002	The Preferred Alternative is misleadingly dubbed a "restoration" alternative by the agencies. It promotes aggressive herbicide, mechanical and fire treatments and seedings without any requirement to address the root causes of ecosystem problems -grazing and roads. There is not even a requirement to seed native plant species following a treatment. Conduct real restoration, relying on passive restoration techniques wherever possible use only native plants in all seedlings.	Same response as previous comment.
129 / 002	ISDA appreciates the planning teams recognition of the importance of noxious weed management. Noxious weeds are one of the most devastating forces occurring on our rangelands today. The aggressive stance the team is taking on noxious weed control will pay dividends well into the future. Invasive annual plants are also a very destructive force found in this area. The planning team has also done a good job at recognizing the need to focus efforts to control the spread of these species throughout the Monument. We encourage the team and subsequent managers to maintain a full spectrum of treatment options including prescriptive grazing as a part of the ongoing fight against these invaders.	Thank you for your comment.
113 / 002	The preferred alternative calls for aggressive noxious weed control and fire management. The plan should recognize grazing as a management tool in obtaining these objectives. Research has been completed that show sheep as an excellent tool for noxious weed control and reducing the fuel load wildfires depend on.	The targeted use of livestock as a cultural or biological tool for noxious weed control is recognized under the Proposed Plan as a viable option within a fully implemented Integrated Weed Management Program. See DEIS p. 25, Management Actions Common To All Alternatives: Vegetation, Including Special Status Species, and Fire Management.

Topic Vegetation

Letter No./ Comment No.	Comment	Response
123 / 002	The West's sagebrush wild lands have long been viewed as a throwaway landscape, and managed for commodity production. Sagebrush species and subspecies of the genus Artemisia are often complexly interspersed across the landscape, varying with elevation, soils and other factors. Anti-sagebrush myth-based management has been pervasive (Welch and Criddle 2003). Virtually all sagebrush wild lands are grazed (Knick 2003), with resultant alteration of species composition and structure, and disruption of ecosystem functioning (Fleischner 1994). There is now widespread recognition of the spiraling loss, fragmentation and endangerment of sagebrush habitats (Ricketts et al. 1999, Knick et al. 2003). A conservation assessment of North American ecoregions found the Snake/Columbia Shrub Steppe bioregionally Outstanding and Endangered, "requiring protection of remaining habitat and extensive restoration." Livestock degradation is setting the stage for irreversible changes, which may have already occurred in the Monument in areas of cheatgrass-infested lands.	The decline of the sagebrush steppe in the western United States is acknowledged in the DEIS (pp. 86-98, Affected Environment, Vegetation, Including Special Status Species, and Fire Management).
37 / 002	However, it is admittedly hard to understand how the Big Desert project could really do anything other than increase fire danger by killing sagebrush and ultimately leading to increases in cheatgrass under the dead shrubs.	The Big Desert Fuelbreaks Project is outside of the boundaries of Craters of the Moon National Monument and Preserve and therefore is not implementing any aspect of the Draft EIS. Future fuels management projects within the Monument boundary will be analyzed through project-level environmental assessments and will be available for public review.
165 / 003	We believe that implementation of Alternative C will result in more acreage of restored sagebrush steppe community than is reported, and perhaps as much as Alternative D. The removal of trails and roads, and other limitations on disturbance in the pristine areas should result in passive restoration of those areas. The Service recommends that the final document estimate the number of acres that will be improved in all alternatives.	Potential restoration acreage in Alternative C was estimated to be less than D due to reduction of acres that would receive a full range of restoration treatments under the increased Pristine Zone acreage. Additional passive restoration through future changes in grazing regimes, or road and trail removal, is possible under any of the alternatives; however, is not guaranteed and therefore was not analyzed. Removal of livestock grazing, roads, trails, etc., do not guarantee restoration by passive means if the area is dominated by cheatgrass and/or noxious weeds, and does not have an adequate on-site seed source for passive revegetation.
37 / 003	I ask that Monument planners find out just what exactly is going on, if any Tebuthiruon has yet been placed, and if so where. As you know, Tebuthiuron persists in soils for long periods of time, as it kills shrubs over a period of 10 years or more. Any chemical-sensitive visitors to the eastern side of Craters may be exposed to chemical-containing dust from this project over the next decade.	The Big Desert Fuelbreaks Project is outside of the boundaries of Craters of the Moon National Monument and Preserve and therefore is not implementing any aspect of the Draft EIS. Future fuels management projects within the Monument boundary will be analyzed through project-level environmental assessments and will be available for public review.

Topic Vegetation

Letter No./ Comment No.	Comment	Response
82 / 004	The Preferred Alternative, so-called, a "restoration" alternative, would promote aggressive herbicide, mechanical and fire treatments and plant seedings with no requirement to address the root causes of ecosystem problems -livestock grazing and roads. There is not even a requirement to seed native plant species following a treatment! Conduct real restoration, relying on passive restoration techniques wherever possible (limit livestock grazing, close roads, remove livestock facilities that are causing weed spread). Use only native plants in all seedings.	See DEIS p. 25, Management Actions Common To All Alternatives: Vegetation, Including Special Status Species, and Fire Management. Restoration treatments are not necessarily active and can include passive methods, such as temporary rest from livestock grazing, depending on the current condition of the vegetation and desired future conditions. The use of native plants is emphasized in all restoration projects and only native species would be used on projects in the Pristine Zone.
82 / 004	There is not even a requirement to seed native plant species following a treatment! Conduct real restoration, relying on passive restoration techniques wherever possible (limit livestock grazing, close roads, remove livestock facilities that are causing weed spread). Use only native plants in all seedings.	Same response as previous comment.
107 / 004	More forbes should be planted in burned areas rather than excessive non-palatable crested wheat grasses and intermediate wheat grasses. This would be more beneficial to sage grouse and domestic sheep grazing.	See DEIS p. 25, Management Actions Common To All Alternatives: Vegetation, Including Special Status Species, and Fire Management.
129 / 004	The Draft EIS emphasizes the need to maintain soil protection to prevent "accelerated and unnatural erosion." While native species are important for a number of ecological reasons, including soil protection, many non-native perennial species are just as effective and much easier to establish in the face of annual grass competition in xeric soil types. ISDA strongly suggests that the team place a heavier emphasis on utilizing those plants that will afford the most soil stability and place less emphasis on whether the plants are native or non-native.	The use of native plants is emphasized in all rehabilitation and restoration projects, as required by BLM policy and Executive Order 13112, Invasive Species, February 3, 1999. However, the ID Team maintained language in the document that would allow use of non-native species if they are the best plant materials available for specific site conditions.
129 / 005	The aggressive restoration goals identified in the vegetation portion of Alterative D (pg 49) are very good goals, but these restoration activities should be closely coordinated with the affected permittees. One of the most environmentally sensitive methods of vegetation manipulation is the use of closely controlled prescriptive grazing. ISDA strongly suggests the team reword restrictive language in the document and maintain prescriptive grazing as a tool to achieve desired future conditions.	Restoration activities will be addressed under project-level environmental assessments, which are available for public review. These activities are closely coordinated with all affected publics, including the permittees. There is no language in the DEIS or Proposed Plan/FEIS prohibiting the use of prescriptive grazing to achieve resource management goals.

Topic Vegetation

Letter No./ Comment No.	Comment	Response
122 / 005	Based on data in the Draft EIS and vegetation assessments conducted by Jurs and Sands (2004) on the vegetation of northern portions of the Monument, it is apparent that between 30-40% of the vegetation in the surveyed areas is in poor condition and will require either active restoration measures or a multi-decades long recovery period (Anderson and Inouye, 2001). Lava Lake believes that it is imperative to conduct active restoration of areas in poor condition, especially those areas that have high levels of cheatgrass and are adjacent to areas in good ecological condition. Because a catastrophic fire could originate in these cheatgrass-infested areas and damage adjacent good condition plant communities, NPS/BLM should, as they have proposed, conduct an active restoration program in Laidlaw Park, in particular.	The vegetation inventory and assessment performed by Jurs and Sands (2004) was utilized in estimating proposed restoration acreages in the Monument. A map based on this assessment (Figure 15) showing the biotic integrity of Monument lands is included in the Proposed Plan/FEIS. Those areas identified as being in poor ecological condition, particularly those in Laidlaw Park, have been identified as highest priority for restoration treatment. Specific restoration treatment methods would be defined in an Environmental Assessment for restoration in Laidlaw Park.
123 / 005	Ecological change in sagebrush communities happens rapidly. Once thresholds are crossed, recovery does not occur, and restoration is extraordinarily difficult, if possible at all. The demise of sagebrush-steppe vegetation in special management areas where agencies fail to take strong action to stop disturbance is vividly apparent in the Snake River Birds of Prey National Conservation Area (SRBOPA).Yesterday's bright hopes for the SRBOPA, now face the cold reality of ever-expanding monocultures of cheatgrass, with some areas burning every 3-5 years. Here the synergistic and cumulative impacts of disturbance - livestock grazing, fire and military training - have wreaked havoc. This has drastic effects on the ground squirrel and jackrabbit prey of raptor populations, sagebrush-obligate songbirds and other native biota (BLM/IDARNG 1996). The BOP demonstrates the fate of the sagebrush lands of the Monument if BLM fails to act in the EIS to control and change livestock grazing practices, decrease effects of roading, emphasize passive restoration and act to protect remaining native vegetation communities.	Areas targeted for restoration within the Monument have an advantage over areas in the Snake River Birds of Prey National Conservation Area (SRBOPA) in that they receive greater precipitation and have soils with greater potential for vegetation production compared to many areas in the SRBOPA. Therefore data pertaining to vegetation treatments in that area are not entirely applicable to the Monument. However, we will consider all available current science when planning treatments.
104 / 006	The EIS should provide a map of the proposed restoration acreage. This information is crucial to understanding the scope of the problem, the need for new read construction, and how restoration efforts will affect the surrounding area. All alternatives should require the use of native plant species or describe the preferences if sufficient seeds of non-native species are not available.	A restoration map (Figure 15) is included in the Proposed Plan/FEIS. Areas targeted for proactive vegetation treatments were identified in the 2004 vegetation inventory (Jurs and Sands 2004) as being in a highly degraded condition. Other areas, identified as fair condition would be considered for more passive means of restoration, including temporary removal of livestock or removal of livestock facilities. BLM believes that not attempting restoration on cheatgrass-dominated ranges will only increase the risk of catastrophic wildland fire and potential loss of intact sagebrush communities adjacent to degraded areas. More information regarding

Topic Vegetation

Letter No./ Comment No.	Comment	Response
		restoration methods will be included in EAs for individual restoration projects. See also DEIS p. 25, Management Actions Common To All Alternatives: Vegetation, Including Special Status Species, and Fire Management. The use of native plants is emphasized in all restoration projects and only native species would be used on projects in the Pristine Zone.
104 / 007	What models and methodology suggest restoration within ten years is reasonable, considering that Jay Anderson concluded that it took nearly fifty years of data to begin to see trends in the sage-steppe at INNEL? P. 170: Restoration methodology is briefly outlined as using "all available methods" but there is nothing that demonstrates landscape scale success anywhere in the west. An honest discussion would need to recognize that only partial restoration is possible and the long term analysis would call for weed control. “All available methods" is a wide open opportunity to use the quick and dirtiest method. We need to emphasize native plants in the restoration. "All available methods" needs to include removal of grazing, which is acknowledged as a primary contributor to weeds, soil disturbance, fire potential and loss of diversity.	The alternatives describe the acreage that would be treated within the life of the plan with the goal of moving the treated areas towards a more functional community (Fire Condition Classes 2 and 1). BLM is aware that full restoration is complicated – methodologies and materials available for restoration are in an evolving state and will be for at least the term of this plan, and likely longer. However, we will use the best tools and science available over this period to treat dysfunctional, cheatgrass-dominated communities and move them toward sagebrush-steppe. Restoration goals always include short- and long-term control of noxious weeds. Shoshone BLM has been a proactive leader in sagebrush steppe restoration in the western US and has several projects showing success in the early stages. BLM believes that not attempting restoration on cheatgrass-dominated ranges will only increase the risk of catastrophic wildland fire and potential loss of intact sagebrush communities. It is our intent to treat those areas identified in the 2004 vegetation inventory and assessment conducted by the BLM and The Nature Conservancy (see Jurs and Sands 2004) as being in a highly degraded condition to reduce this risk and to protect good condition areas, as well as those that can be improved by less invasive means, including temporary removal of livestock. More information regarding restoration methods will be included in environmental assessments for individual restoration projects.
104 / 007	Zone shift discussed in Zone Characterizations. The BLM should clarify what models and methodology suggest restoration within ten years is reasonable (as noted under Alternative D, P.49), considering that Jay Anderson concluded that it took nearly fifty years of data to begin to see trends in the sage-steppe INEEL. Restoration methodology is briefly outlined as using “all available methods” (P. 170) but there is nothing that demonstrates landscape scale success anywhere in the west. An honest discussion would need to recognize that only partial restoration is possible and the long-range impact of weeds will be considerable and require constant management.	The alternatives describe the acreage that would be treated within the life of the plan with the goal of moving the treated areas towards a more functional community (Fire Condition Classes 2 and 1). BLM is aware that full restoration is complicated – methodologies and materials available for restoration are in an evolving state and will be for at least the term of this plan, and likely longer. However, we will use the best tools and science available over this period to treat dysfunctional, cheatgrass-dominated communities and move them toward sagebrush-steppe. Restoration goals always include short- and long-term control of noxious weeds. Shoshone BLM has been a proactive leader in sagebrush steppe restoration in the western US and

Letter No./ Comment No.	Comment	Response
		has several projects showing success in the early stages. BLM believes that not attempting restoration on cheatgrass-dominated ranges will only increase the risk of catastrophic wildland fire and potential loss of intact sagebrush communities. It is our intent to treat those areas identified in the 2004 vegetation inventory and assessment conducted by the BLM and The Nature Conservancy (see Jurs and Sands 2004) as being in a highly degraded condition to reduce this risk and to protect good condition areas, as well as those that can be improved by less invasive means, including temporary removal of livestock. More information regarding restoration methods will be included in environmental assessments for individual restoration projects.
123 / 007	There is a great urgency to take strong and decisive steps to limit livestock disturbance of soils and vegetation, and try to slow the spread of exotic species. We have just reviewed a Shoshone BLM EA that describes trying to rehab an OHV hill-claim area in the Sand Butte WSA. This EA states "rush skeletonweed is common in the general area" – which is just upwind of Laidlaw Park! The livestock-disturbed lands of the Monument are at great risk of rapid spread of this highly invasive exotic whose small seeds are transported on wind.	The DEIS acknowledges that livestock are known vectors to the spread of noxious weeds (Ch. 3, Discussion on Noxious and Exotic Species, p. 92). A full Integrated Weed Management Program addresses a broad range of prevention, education, and control activities to combat noxious weeds (see DEIS p. 25, Management Guidelines Common To All Alternatives: Vegetation, Including Special Status Species and Fire Management.
111 / 008	Where restoration work involves seedings, only native plants should be used.	See DEIS p. 25, Management Actions Common To All Alternatives: Vegetation, Including Special Status Species, and Fire Management. Restoration treatments are not necessarily active and can include passive methods, such as temporary rest from livestock grazing, depending on the current condition of the vegetation and desired future conditions. The use of native plants is emphasized in all restoration projects and only native species would be used on projects in the Pristine Zone.
104 / 008	The plan should contain an assessment of the potential impact from future noxious weed infestation resulting from a significant expansion of Passage Zone. The plan seems to ignore the strong correlation between roads/vehicular traffic and noxious weed infestations. According to the numerous sources and studies, roads and trails, and their accompanying motorized users are the primary conduits for noxious weed species transport and establishment. In addition, recent studies show that improved roads accelerate noxious weed expansion significantly more than primitive ones while unroaded areas act as strongholds for native species against invasions. The DEIS fails to analyze how each level of road improvement will expose an increasing area of native vegetation to invasion by exotic weeds. The study found	Analysis in the DEIS (Ch. 4) acknowledges the risk of increased road development relative to weed infestation. In response to comments such as this the ID team reduced the amount of Passage Zone in the Proposed Plan/FEIS, particularly in Laidlaw Park. The implementation plan for transportation will address road development within specific areas and zones of the Monument, with consideration to these and other issues. The DEIS acknowledges that roads, vehicles, humans, and animals are known vectors to the spread of noxious weeds (Ch. 3, Discussion on Noxious and Exotic Species, p. 92). A full Integrated Weed Management Program addresses a broad range of prevention, education, and control activities to combat noxious weeds (see DEIS

Topic Vegetation

Letter No./ Comment No.	Comment	Response
	significantly greater numbers of non-native weeds adjacent to paved roads than four wheel drive…	p. 25, Management Actions Common to All Alternatives: Vegetation, Including Special Status Species, and Fire Management).
70 / 009	No restoration should proceed without a long term monitoring and response protocol mandated and funded as a part of the initial restoration. We need a map showing restoration acreage.	A map of proposed restoration acreages has been added to the Proposed Plan/FEIS. Monitoring protocols for all restoration projects will be addressed in project-level environmental assessments.
123 / 010	There are no provisions to restore damaged playas. For example, all playas should be assessed for potential for restoration, and those with potential should have stock ponds removed.	Playas would be considered for restoration on a case-by-case basis. The DEIS (p. 29, Management Actions Common to All: Livestock Grazing) states "BLM may remove developments if they are no longer serving a useful purpose or resource objectives warrant their removal. Sites would be restored." In addition, no additional playas would be modified or developed (DEIS p. 26, Management Actions Common to All: Water Resources). Language regarding the restoration of playas has been added to the Proposed Plan/FEIS.
105 / 011	Development of a fire plan for the Monument lands must be part of the comprehensive planning process. Protection of existing native habitat, especially sagebrush, should be identified as a top priority in fire situations. Whether a wild fire or a prescribed burn, all areas should be reseeded with native plants and adequately rested from livestock grazing and recreation use to allow native plant establishment and lessen the spread of weeds. No new crested wheat grass seedlings or other exotic species should be used to restore native habitat. The BLM and NPS should work to establish their own, local seed sources from within the Monument. Areas should be identified (possibly Laidlaw Park) where select removal of a desired species seed will not impact the current location, but will provide native seed to another location if none is available from the usual DOI sources. The Monument plan should identify as one of its primary goals, restoration and maintenance of native vegetation on all lands altered by fire or other disturbance. Restoration should be conducted using only native species. Specific timelines for restoration, revegetation and rest should be included in the management plan. The management plan should also include a timeline for revegetation and/or restoration to natural conditions of all "user-created" motorized routes in the Monument.	A Fire Management Plan would be prepared as part of the implementation of the Proposed Plan (DEIS p. 12, Future Planning Needs, Fire Management Plan). Currently the Monument operates under two Fire Management Plans: the 2004 South Central Idaho FMP covers BLM-administered lands and the Preserve; the 2000 NPS Wildland FMP covers the original Monument. The updated FMP would guide suppression efforts as well as pro-active fuels reduction and restoration treatments, and would detail goals and constraints in specific fire management areas based on resource objectives outlined in the RMP/GMP. In addition, post-fire rehabilitation on BLM-administered lands within the Monument is guided currently by the Shoshone and Burley Field Office Normal Fire Rehabilitation Plans. In all cases, the use of native plants is emphasized and only native species would be used on projects in the Pristine Zone. BLM and NPS are currently funded and have applied for additional funding for native seed increase projects specifically for plants found within the Monument. BLM is working with the USFS Rocky Mountain Research Station and private growers to collect and increase plants to be used in large-scale restoration and post-wildland fire rehabilitation projects; NPS is working with NRCS the Natural Resources Conservation Service to increase plants specific to the Monument and Preserve. Every effort is being made to utilize the best available science and plant materials in restoration and rehabilitation projects. Restoration of user-created or closed routes would be addressed after completion of the Transportation Plan.

Topic Vegetation

Letter No./ Comment No.	Comment	Response
165 / 011	Page 49 -Alternative D, Vegetation; Management Actions, 6th bullet: The statement suggests that there are objectives that would conflict with wildland fire other than life and property protection and that these objectives are known and prioritized. We recommend these be identified and their priority justified in the final document. The reader cannot judge the applicability or utility of a management action without this knowledge.	Wildland Fire Use for Resource Benefit is a site-specific action, requiring a project-specific burn plan for implementation. Resource management objectives which are broadly outlined in the DEIS and Proposed Plan/FEIS guide implementation- and project-level planning. More site-specific objectives can be dynamic and are therefore updated periodically in the Fire Management Plans, and are addressed specifically in burn plans. Current resource considerations for the Craters of the Moon Wilderness can be found in the NPS Fire Management Plan (2000). Resource considerations for the Preserve (Craters Fire Management Unit) can be found in the 2004 BLM South Central Idaho Fire Management Plan.
165 / 017	Page 59 -Natural Resources; AlternativeB, C, and D: The rationale for different target acreages between alternatives is unclear. In addition, it is unclear what the differences are between Alternative C and D in the last row of the table.	Table 7 is a summary of the proposed alternatives. The full description of each alternative is found in DEIS Ch. 2.
165 / 019	Page 68 -Table 8; Summary of Impacts; Vegetation andFire Management: Although less active restoration (in acres) would be realized in Alternative C, more passive restoration would be realized by the reduction of access and motorized activities. The rate of restoration may be slower in some areas but higher in others because of the lack of disturbances such as mechanized activities, planting of non-native forage species, and reduced probability of human-induced fire. This would result in a larger area of restored ecosystem, even if it takes a longer period of time. There would be less opportunity for noxious weed management in Alternative C, but there should be less need for it as well. Many of the restoration activities outlined in Alternative D will need to be applied repeatedly because of ongoing activities that facilitate weed introduction.	Thank you for your comment. We will consider these points in the appropriate implementation- and project-level plans.
123 / 019	Restoration (DEIS at 8, 17). The DEIS provides a flawed, unscientific and commodity-use biased definition of “restoration”. See DEIS at 387: “Actions that proactively treat degraded vegetation with the intent of meeting resource management objectives. Restoration treatments can include prescribed fire, herbicide use to control weeds, and seeding with desirable vegetation”. This is not restoration. “Resource management objectives” may be providing cattle food. This has nothing to do with ensuring ecological integrity. The DEIS actions are better described as “treatment”. Why don’t you just call it treatment,	The DEIS explicitly states (DEIS p. 25, Management Actions Common to All Alternatives: Vegetation, Including Special Status Species, and Fire Management, and p. 49, Management Actions under Alternative D for Vegetation) that the goal of restoration treatments is to restore sagebrush steppe and wildlife habitat. Additional information regarding restoration treatment methods and protocols is included in the Proposed Plan/FEIS.

Topic Vegetation

Letter No./ Comment No.	Comment	Response
	instead of contriving a non-ecologically based, circular definition. A restoration action that is "desired" is something that the agency (with bias towards continued commodity production) describes.	
165 / 021	Page 70-Land Use and Transportation; Livestock Grazing: It states that Alternative D would involve the largest acreage identified for restoration. This may not be true if the acreage passively restored by Pristine Zone designation in Alternative C.	Many of the impacts mentioned will be addressed later in implementation-level plans including Transportation, Fire, and Wilderness Management Plans. Each of these plans, as well NEPA documents for individual projects, will address pygmy rabbits as well as other sensitive or rare species. Specific project planning will also address the needs of these species. Inventory work for rabbits will continue and the agencies will take appropriate actions when rabbits or quality habitat are. We agree that consideration of the pygmy rabbit is important. BLM and NPS policy insures that appropriate measures will be taken to reduce or eliminate negative impacts to the pygmy rabbit and its habitat. Additionally, our goal of restoring degraded sagebrush steppe habitat will provide additional quality pygmy rabbit habitat over the current situation.
123 / 026	DEIS at 17 claims that sagebrush-steppe restoration is common to all alternatives. Yet, there is no incorporation of passive restoration, no grappling with the futility of undertaking restoration while without any overarching livestock grazing management, etc.	See DEIS p. 25, Management Actions Common To All Alternatives: Vegetation, Including Special Status Species, and Fire Management. Restoration treatments are not necessarily active and can include passive methods depending on the current condition of the vegetation and desired future conditions. Additional information regarding restoration treatment methods and protocols is included in the Proposed Plan/FEIS.
123 / 032	Instead of use of native plants would be emphasized, use of native plants in post-fire and rehab, must be mandatory.	See DEIS p. 25, Management Actions Common To All Alternatives: Vegetation, Including Special Status Species, and Fire Management. Restoration treatments are not necessarily active and can include passive methods, such as temporary rest from livestock grazing, depending on the current condition of the vegetation and desired future conditions. The use of native plants is emphasized in all restoration projects and only native species would be used on projects in the Pristine Zone. Additional information regarding restoration treatment methods and protocols is included in the Proposed Plan/FEIS.

Topic Vegetation

Letter No./ Comment No.	Comment	Response
123 / 063	DEIS at 59. The acres of lands to be treated under all alternatives appear to be completely arbitrary, and so the numbers could be easily changed under any alternative. These acreages should not be the basis for saying one alternative is better or worse than the other. What exactly is the basis of the land area acreage targeted for treatment under all Alternatives? The EIS fails to present an up-to-date assessment or other information on the ecological condition of all Monument lands. Which are in poor, fair, good, or excellent condition? Have you revisited the old SVIM sites and compared past vs. present condition? If so, what are the results? What do current inventories – as of sagebrush-steppe species - tell you about the ecological condition?	A vegetation inventory and assessment for Laidlaw Park, Little Park, and Paddelford Flat was performed by the BLM in cooperation with The Nature Conservancy in 2002/2003 (Jurs and Sands 2004). This assessment was utilized in estimating proposed restoration acreages in the Monument. A map based on this assessment (Figure 15) showing the biotic integrity of Monument lands is included in the Proposed Plan/FEIS. Those areas identified as being in poor ecological condition, particularly those in Laidlaw Park, have been identified as highest priority for restoration treatment. Specific restoration treatment methods and locations would be defined in environmental assessments for restoration in Laidlaw Park and other areas of the Monument, which would be available for public review.
123 / 077	Map DEIS at 87 shows “perennial grassland”. These areas are the exotic crested wheatgrass or intermediate wheatgrass, but also may contain a significant amount of cheatgrass and other weeds. There is no assessment of the condition of interspaces. The Map shows that almost half the sagebrush-steppe habitats in the Monument have been converted to crested wheatgrass or cheatgrass. This map fails to show areas where cheatgrass dominated the understory of sagebrush communities.	The vegetation map included in the DEIS was produced from satellite imagery and is intended to give a general idea of vegetation distribution within the Monument. Please refer to DEIS p. 86 third paragraph in the right-hand column (Data from various vegetation studies . . .) for a discussion of the limitation of the vegetation map.
123 / 080	The DEIS provides no assessment of the probability of success of any treatments that it would conduct. The Plan must assess risks, and likelihood of success of treatments. There is also no requirement to use native vegetation its so-called restoration. What else, besides just rehabilitating by seeding, must managers do to effectively “treat” cheatgrass-infested interspaces? While it is nice that BLM and NPS “encourage” the use of native species, no requirement under any Alternative to actually use native species in treatments.	See p. 25 Management Actions Common To All Alternatives: Vegetation, Including Special Status Species, and Fire Management. Restoration treatments are not necessarily active and can include passive methods, such as rest from grazing, depending on the current condition of the vegetation and desired future conditions. Additional information regarding restoration treatment methods and protocols is included in the Proposed Plan/FEIS. Specific methods, analysis of treatment effects, and criteria for determining success of treatments will be addressed in environmental assessments for individual restoration projects. The use of native plants is emphasized in all restoration projects, pursuant to BLM policy and Executive Order 13112, Invasive Species, February 3, 1999, and only native species would be used on projects in the Pristine Zone.

Topic Vegetation

Letter No./ Comment No.	Comment	Response
123 / 081	Which areas, specifically, are dominated by native perennial grasslands? Does your statement on DEIS at 86 mean that you plan to burn kipukas? We believe this would be a big mistake.	The vegetation map included in the DEIS was produced from satellite imagery and is intended to give a general idea of vegetation distribution within the Monument. Please refer to DEIS p. 86 third paragraph in the right-hand column (Data from various vegetation studies . . .) for a discussion of the limitation of the vegetation map. Prescribed burning of kipukas is not being considered at this time.
123 / 086	As part of all alternatives, playas that have been damaged by gouging livestock ponds into them should be assessed for restoration potential.	Playas would be considered for restoration on a case-by-case basis. The DEIS (p. 29, Management Actions Common to All: Livestock Grazing) states "BLM may remove developments if they are no longer serving a useful purpose or resource objectives warrant their removal. Sites would be restored." In addition, no additional playas would be modified or developed (DEIS p. 26, Management Actions Common to All: Water Resources). Language regarding the restoration of playas has been added to the Proposed Plan/FEIS.
123 / 097	In its Laidlaw EA as in the DEIS, BLM failed to consider any alternatives that maximize wildlife habitat protections, removed livestock use from sensitive areas, undertakes actions necessary to protect sagebrush communities threatened by weed invasion, etc. Laidlaw EA at 13-14 describes surveys for migratory birds, and widespread declines between 1980 and 2002. EA at 13. The 2002 migratory bird data showed widespread declines of sage thrashers and sage sparrows, declines which are most likely correlated to declines in sagebrush and native grass cover. Response to Protest at 16 describes Aroga moth-caused mortality of sagebrush. EA at 7: "fires, livestock grazing practices and road maintenance have created disturbances which have allowed … weeds to spread". Laidlaw EA at 8 "portions of this allotment are currently experiencing large amounts of Wyoming and Basin big sagebrush mortality" reasons –include "grazing pressure". Laidlaw EA at 189: "much of the native plant community in the southern portion of Laidlaw Park has been replaced with cheatgrass" . This all highlights the need for strong, decisive action to protect remaining habitats from causes of degradation an – action completely cast aside in the EA and DEIS.	All alternatives contain specific management guidance for wildlife protection, particularly sagebrush steppe obligates. Measures are in place to protect the sagebrush steppe in the Monument (see Management Guidance Common to All Alternatives: Vegetation, Including Special Status Species, and Fire Management; and Wildlife, Including Special Status Species; DEIS pp. 25-26.) In addition, all allotments must meet or be progressing towards meeting Idaho Standards and Guidelines, including Standard 4 (Native Plant Communities), and Standard 8 (Special Status Species) (DEIS p. 29, Management Guidance Common to All Alternatives: Livestock Grazing).

Topic Vegetation

Letter No./ Comment No.	Comment	Response
123 / 102	The Laidlaw EA stated that Laidlaw Park is an isolated ecological community 58, 618 acres native vegetation, 28,000 acres annual grasses, 6,960 acres seeding. Its isolation "makes it well suited for the study of native plants and potential natural vegetative communities". We have been trying to obtain a copy of this survey for months, and have been told by BLM that it is complete, and that we needed to contact TNC. We have done so, and they have not provided us with a copy in time for use in these comments. It appears that BLM is purposefully not incorporating this study's results into the DEIS. We request to be able to submit additional comments when we finally obtain this document.	The vegetation inventory and assessment performed by Jurs and Sands (2004) was utilized in estimating proposed restoration acreages in the DEIS. A map based on this assessment (Figure 15) showing the biotic integrity of Monument lands is included in the Proposed Plan/FEIS. Those areas identified as being in poor ecological condition, particularly those in Laidlaw Park, have been identified as highest priority for restoration treatment. Specific restoration treatment methods, based on recommendations from the Jurs and Sands (2004) report, would be defined in an environmental assessment for restoration in assessment area.
123 / 151	The evaluation of Vegetation, including special status species, completely limits assessment of the impacts on vegetation of livestock use and disturbance across nearly all sagebrush lands of the Monument. As DEIS maps of allotments show, nearly all of these sagebrush lands are located inside a confusion of grazing allotments. This must be addressed in a Supplemental EIS.	Potential impacts of livestock use as it varies by alternative were analyzed in the DEIS, Ch. 4. Specific effects of allotment management decisions will be addressed in project- or allotment-level environmental assessments.
123 / 152	What are vegetation conditions inside exclosures in the Monument and surrounding increase livestock grazing and trampling impacts – all unassessed.	The agencies used the most current data available to them in preparation of the DEIS.
123 / 157	As the EIS has failed to study and assess the impacts of passive restoration, it cannot conclude that restoration under Alt. C would occur more slowly.	The intent under alternative C was that treatments would possibly be applied more slowly as less intrusive technology becomes available. See p. 25, Management Actions Common To All Alternatives for Vegetation, Including Special Status Species, and Fire Management. Restoration treatments are not necessarily active and can include passive methods, e.g. rest from livestock grazing, depending on the current condition of the vegetation and desired future conditions. Additional information regarding restoration treatment methods and protocols is included in the Proposed Plan/FEIS.
123 / 164	The DEIS can not claim it is using "integrated weed management" if it fails to employ passive restoration techniques – i.e. take action to prevent infestations to protect expensively treated areas when grazing again resumes, specify limitations n livestock grazing of infested areas, etc.	Restoration goals always include short- and long-term management of noxious weeds utilizing both passive and active methodologies associated with an Integrated Weed Management program. If monitoring shows that grazing is impacting the restoration process, temporary removal of livestock is a legitimate response to correct the problem.

Topic Vegetation

Letter No./ Comment No.	Comment	Response
123 / 168	While the DEIS uses ICBEMP guidance as an excuse to treat large areas, it ignores guidance in ICBEMP, such as Wisdom et. al. (2000), that emphasizes protection of sagebrush steppe habitats - instead of the accelerated disturbance and more roads, more livestock projects, likely more AUMs actually grazed and more fragmentation that will occur under the Preferred Alternative of this myopic EIS.	To protect sagebrush steppe communities and reduce fragmentation, acreage of Pristine Zone was increased and acreage of Passage Zone decreased in the Proposed Plan. See DEIS p. 25, Management Guidance Common to All Alternatives for Vegetation regarding protection and restoration of sagebrush steppe habitats.
123 / 185	Prevent conditions that favor vegetation problems, i.e. protect the good or better ecological condition communities that remain. Restore ecological integrity on sites with vegetation problems. Restoration must be performed in a precautionary manner. BLM has countless examples of the failure of aggressive pseudo-restoration/treatment scattered across the Snake River Plain and the interior West. Indeed, the “aggressive” techniques proposed by BLM resemble the livestock forage projects undertaken in the Vale Project – herbiciding, disking, seeding exotics. It is appalling that BLM does not even commit to using native plant species in its aggressive restoration efforts. While such false restoration may produce more cattle and sheep forage, it should be called “treatment”, and not “restoration”. Emphasis must be placed on the use of passive restoration techniques, and protection of remaining sagebrush lands. Economics alone dictates, this, as aggressive restoration may costs over $100 per acre, with no guarantee of success. Failure is common – due to dry winters or springs, insects, livestock trespass devouring new seedlings and transporting weed seeds, etc. Passive restoration includes: * Area, road and OHV route closures. * Voluntary livestock permit retirement. * Retirement of vacant grazing allotments. This EIS must authorize grazing permit retirement, so that complicated (and costly) Land Use Plan amendments are not necessary when this inevitably arises during the life of the plan. * Excluding livestock from areas with aggressive weed infestations, uplands “at risk” of weed infestation, special status species habitats, etc. * Restrictions on livestock activities such as salt placement, herding, location of sheep camps. * Removal of livestock facilities that are causing damage, fostering weed spread, etc. Vegetation Treatments are Actions, based on scientific evidence, that will: Affect the conservation and restoration of native vegetation communities, watersheds and wildlife habitats.	See p. 25 Management Actions Common To All Alternatives: Vegetation, Including Special Status Species, and Fire Management. Restoration treatments are not necessarily active and can include passive methods, such as rest from grazing, depending on the current condition of the vegetation and desired future conditions. Additional information regarding restoration treatment methods and protocols is included in the Proposed Plan/FEIS. Specific methods, analysis of treatment effects, and criteria for determining success of treatments will be addressed in environmental assessments for individual restoration projects. The use of native plants is emphasized in all restoration projects, pursuant to BLM policy and Executive Order 13112, Invasive Species, February 3, 1999, and only native species would be used on projects in the Pristine Zone.

Topic Vegetation

Letter No./ Comment No.	Comment	Response
	These include: prevention treatments that will result in measurable soil, hydrological, and vegetation changes that resist invasive exotic species; active and passive restoration treatments that restore native vegetation and/or conditions favorable to native communities. Any treatments must be based on assessments of: 1) The condition of vegetation; 2) Major human causes of disturbance 3) Opportunities for conservation of native vegetation and prevention of soil disturbance and vegetation problems; 4) Results of past vegetation treatments. For example, BLM has disastrously applied herbicides on the Snake River Plain (the Oust fiasco), and this should make the agency very wary about herbicide use in unpredictable wild land settings; 5) Likelihood of treatment options for achieving long-term restoration.	
123 / 186	In order to determine current conditions andidentify actions in alternatives, the DEIS must: Map and Identify (collecting new baseline information where necessary): 1) Key areas of native vegetation (in Craters – all) and high ecological integrity. 2) Suitable and critical habitat for habitat-specialist species. 3) Suitable habitat for wide-ranging species such as sage grouse that require use of extensive and temporally diverse (winter, summer habitats) within the ecoregion. 4) Hotspots of diversity. 5) Habitats "at risk" of further fragmentation or degradation. 6) Areas where restoration will increase potential for habitat connectivity. 7) Areas that could benefit from improved management or restoration to maintain or enhance ecological integrity.	Inventory of vegetation and wildlife resources of the Monument is ongoing through cooperative efforts with Idaho State University, Idaho Bird Observatory, and The Nature Conservancy (Jurs and Sands 2004). Some of this information was integrated into the DEIS and Proposed Plan/FEIS and future results will be integrated into implementation-level planning efforts.
123 / 187	It must also: * Collect information on current ecological condition and special status species occurrence and habitats * Identify spatial and temporal association of vegetation problems and compare and contrast with the spatial and temporal occurrence of past and continuing human activities. * Identify key areas to phase out grazing – key habitats, areas where grazing is clearly incompatible with vegetation and habitat recovery. * Conduct a road and off-road vehicle routes assessment with the goal of closing roads and routes in ecologically sensitive areas * Identify invasive exotic species and exotic species plantings to restore. Cheatgrass, intermediate wheatgrass and crested wheatgrass areas must be restored. A key component of plant communities that is altered by physical damage due to livestock grazing (and sheep browsing) is the structural diversity of	Thank you for your comment. Implementation relative to closure and restoration of routes will be addressed in a Travel Management Plan (DEIS p. 12, Future Planning Needs and p. 28 Management Guidelines Common to All Alternatives: Land Use and Transportation). Implementation of restoration and fuels reduction projects will be guided by the final Monument Proposed Plan/FEIS. Project-level environmental assessments would apply current inventory and evaluation of vegetation conditions (e.g. Jurs and Sands 2004), best available science and plant materials, Desire Future Conditions and Management Actions outlined in the Proposed Plan/FEIS, and all applicable law and policy. See also DEIS p. 25-26, Management Actions Common To All Alternatives: Vegetation, Including Special Status Species, and Fire Management, and Wildlife, including Special Status Species.

Topic Vegetation

Letter No./ Comment No.	Comment	Response
	sagebrush, bitterbrush and other native shrubs. Livestock impacts simplify structure – a particular concern in lands grazed by both sheep and cattle. Restoration of structural diversity of native shrubs must be part of the goal any “treatment”. Plans must include honest assessment of: current site conditions, vulnerable wildlife and plant species habitats, habitat connectivity for special status species and species of concern, past and present (ongoing) activities leading to vegetation problems, passive and active restoration needs; feasible restoration goals. Treatments should be prioritized based on cessation of activities that impede natural recovery, i.e. passive restoration, active restoration treatments that incorporate passive restoration, and last -active restoration treatments to restore ecological integrity, Use a precautionary approach that incorporates the best available science, least intrusive techniques to restore ecological integrity, least risky intervention techniques, recovery plans for species of concern, prevention strategies to reduce the need for chemical and mechanical treatments or prescribed fire, so that the number of acres treated annually will decline over the life of the EIS. Invasive species must be minimized through conservation and restoration of native vegetation communities, watersheds, and wildlife habitats. Executive Order No. 13112, “Invasive Species” describes two facets of invasive species control: prevent the spread of invasive species, and restore native species and habitats to reduce the effects of invasive species and to prevent further spread. The long-term DEIS management must: Identify and lessen the conditions that cause or favor the introduction, establishment, and spread of invasive species - and identify methods to ameliorate those conditions. Due to large-scale loss of sagebrush-steppe, and the continuing structural alteration and understory alteration and degradation of remaining grazed sagebrush-steppe lands, the DEIS must avoid roadless areas, old growth, special status species habitats, ecologically sensitive areas, and areas of high ecological integrity (non-fragmented). Any treatments should not: increase motorized vehicle use or access, increase fire risk through invasion of exotic plants or accumulation of activity fuels, limit native pant recovery through chipping or ground disturbing activities. Science-based protocols must be designed to prevent the spread of invasive species in relation to all activities that have been identified in the scientific literature to as primary facilitators of the establishment and spread of invasive species, watershed degradation, and loss of native species.	

Topic Vegetation

Letter No./ Comment No.	Comment	Response
123 / 191	Treatments of Vegetation must be undertaken as follows: 1) Use the least intrusive/extensive/risky methods. Methods must aim to enhance wildlife habitats and populations. 2) Analyze potential effects of site-specific treatments on an array of species; reliance on assessment of effects only on umbrella species is not sufficient. An example of the insufficiency of analysis of effects solely on umbrella species involves sagebrush canopy "thinning" for sage grouse. This may negatively impact nesting cover for migratory bird species of concern, pygmy rabbit and other species. 3) Be part of an over-all ecologically based restoration plan and may include: biological control, cultural practices, mechanical treatments, chemical treatments, prescribed fire. 4) Base selection on ecological priorities for restoration rather than economic benefits; size of the proposed treatment area, its location, and the biology of the target invasive species. 5) Except for treatment of small infestations without motorized equipment, use direct treatments within designated wilderness or WSAs only in conjunction with efforts to halt avoidable spread of invasives into wilderness from outside areas. 6) Prioritize non-chemical methods over chemical methods. 7) Small infestations must have higher priority than larger infestations, i.e. there might still be some hope of stopping smaller infestations in wild lands. 8) Plant and seed appropriate native species to compete with exotics. 9) Use cultural treatments that have been shown to be effective in restoring native vegetation in scientific studies. 10) Use mechanical treatments that have been shown to be effective in restoring native vegetation in scientific studies (mowing, spot fire, mastication, weed eaters, mulching hand pulling). 11) Chemical treatments should use application methods that minimize exposure to people, wildlife, native plants, Spot treatments are preferred over broadcast. Follow-up with technique to get native vegetation to grow again. Don't just spray and walk away. 12) No use of broadcast herbicides near rare plant, amphibian and other chemical-sensitive species habitats. Avoid use of broadcast herbicides as much as possible. 13) Avoid application of herbicides (atrazine) that may affect aquatic species, i.e. near playas. 14) Only use herbicides that minimize adverse effects on environmental and human health, based on knowledge of all ingredients in the formulation, should be used. 15) Prohibit all use of sulfonylurea herbicides and other acetolactate synthase-inhibiting herbicides due to their demonstrated ability to damage off-site native or crop species.	Thank you for your comment. We will consider these points in the appropriate implementation- and project-level plans.

Topic Vegetation

Letter No./ Comment No.	Comment	Response
	16) Design any treatments to account for wildlife habitat needs, for example, timing and location of activities. No treatments during nesting season, wintering season or other sensitive periods. Herbicides can have numerous toxic effects on workers, nearby residents, beneficial soil organisms, and native plant species. Herbicides simplify the vegetation community. They may render the treated site more vulnerable to return of invasive species. Herbicides (and other aggressive treatments) alone do not address the conditions that favor the introduction, establishment, spread of exotic species.	

Topic Fire Management

152 / 001	While I support aggressive weed control, fire management, and restoration, the proposal to further develop roads will actually increase the threat of noxious weeds and fire risk, as well as accelerate damage to wilderness values and geologic features.	Analysis in the DEIS (Ch. 4) acknowledges the risk of increased road improvement relative to weed infestation, fire risk, wilderness values and geologic features. In response to comments such as this the ID team reduced the amount of Passage Zone in the Proposed Plan/FEIS, particularly in Laidlaw Park. The implementation plan for transportation will address road maintenance and improvement within specific areas and zones of the Monument, with consideration to these and other issues.
81 / 002	Passive restoration methods should be included, such as removal of unnecessary water developments that injure wildlife and spread weeds, and seeding with native plants only, in the restoration of cheatgrass infested areas.	See DEIS p. 25, Management Actions Common To All Alternatives: Vegetation, Including Special Status Species, and Fire Management.
104 / 010	…should be an increased risk of human-caused fires. The FEIS should include data on the location and source of past fires in this area and analyze how each alternative will affect the probability of these ignitions.	A fire history map is included in the Proposed Plan/FEIS. Analysis of the impacts of each alternative on potential for fire ignition and spread is included in the DEIS (Ch. 4). Statistics on the cause of ignitions in the Monument are included in the 2004 South Central Idaho Fire Management Plan, which is available through the Shoshone Field Office.
70 / 013	What is the basis for suggesting that "the potential for human caused fires under Alternative D could be less than in Alternative A because D would involve less accommodations of visitors in the including increased weed spread and fire ignition? comes with improved access (roads)?	Alternative D emphasizes a higher level of vegetation restoration treatments to reduce flammable fuels and the concurrent risk of catastrophic wildland fire. This was included in Alternative D to a) restore degraded sagebrush steppe communities and b) reduce spread of human-ignited fire associated with potential increased visitation.

Topic Fire Management

Letter No./ Comment No.	Comment	Response
123 / 111	All BLM lands, including Laidlaw Park, are threatened by the aggressive fire arm of BLM, and the actions it has been known to take in Idaho to ramrod spurious projects forward. For example, the Inside Desert fuelbreaks EA is a harebrained plan to kill sagebrush to, ostensibly, try to prevent more fires from burning the Inside Desert. Sagebrush is to be killed with the persistent herbicide Tebuthiuron along the main access road to the east side of Craters. Yet, Monument staff were not even told that Idaho Falls BLM was doing this. In order to limit the ability of citizens to stop a project for which inadequate analysis had been conducted, and which very likely through killing sagebrush and other disturbance will result in MORE cheatgrass and fire danger, BLM issued a Full Force and Effect Decision. As a result, chemical-sensitive visitors to the east side of the Monument will be subject to dust containing an herbicide known to persist in soils for a decade or more. Throughout this analysis, the cumulative impact of the aggressive fire arm of BLM, operating under the cover of the Healthy Forests Initiative, must be considered in assessing cumulative impacts.	Cumulative impacts of fuels reduction/restoration projects outside the Monument on Monument resources were addressed in Ch. 4 of the DEIS.
123 / 158	There is no need to burn aspen to improve condition/stimulate sucker growth. Please see the work of Dr. Charles Kay on the impacts of livestock on aspen herbivory, and incorporate this into the SEIS.	Pertinent literature would be reviewed for any projects affecting aspen communities and incorporated into the site-specific environmental analysis.
123 / 192	Extreme caution must be used in any application of prescribed fire. The Snake River Plain is full of examples of disastrous post-prescribed fire cheatgrass invasions. Fire should NOT be used to “thin” sagebrush. In fact, almost the only prescribed burning that should be allowed is to kill cheatgrass seed - in areas that have become cheatgrass monocultures due to the combined effects of grazing and fire. Any proposal to “thin” sagebrush must be examined for effects on habitats on a broad spectrum of sagebrush-obligate species. Given the large-scale loss of big sagebrush through fire and through purposeful agency projects of the past, continued sagebrush die-off, the unwillingness of the DEIS to address grazing changes at all, and the presence of intermediate wheatgrass and other purposefully seeded exotics that would increase with sagebrush removal, it is hard to envision circumstances in the Monument that would warrant sagebrush thinning here. For example, the pygmy rabbit requires dense and	Thank you for your comment. We will consider these points in the appropriate implementation- and project-level plans.

Topic Fire Management

Letter No./ Comment No.	Comment	Response
	structurally diverse canopy cover of big sagebrush – BLM, in the name of trying to promote forb diversity, is foolishly is thinning big sagebrush in the Upper Pahsimeroi by beating it. This is the dead opposite of what is required by the pygmy rabbit, and the DEIS must recognize the need for species-specific analysis. All of the following must be documented and assessed prior to prescribed burns or any other treatment, and an overall examination provided in the SEIS: * Long-term damage to biological soil crusts. * Soil erosion through wind and runoff events. * Long-term loss of nutrients from already nutrient-deficient soils. * Loss of populations and habitat of special status species. * Loss of populations and habitat of special status species. * Risk of invasive species. * Any radionuclides in the soil or vegetation of the area. * Interrelation between treatment projects on Monument and other state, private and federal lands in the surrounding area. * Indigenous uses of plants that may be impacted. * Impacts on air quality. * Lethal effects of treatment on native vegetation within treatment area (for example, fire may kill Idaho fescue). * Likelihood that "treatment" may give competitive advantage to aggressive exotics. For example, intermediate wheatgrass has been seeded in large areas in the northern part of the Monument following 1992 fires. IWG is an aggressive rhizomatous exotic species that may increase following fire. Its rhizomes/tillers cover the ground, precluding the establishment of native species. IWG is known to be invading the margins of slickspots that provide habitat for a rare plant, slickspot peppergrass. * Assessment of amount of existing fragmentation. Any treatment should: * Use existing roads wherever possible. * Commit to restoration of any routes created. * Limit ground disturbance. * Contain the treatment (fire, chemical) within the area targeted. As part of any treatment or following wildfire, to restore natural processes, comprehensive restoration assessments with clear objectives, in conjunction with other active or passive methods must occur and must include: * Minimize introduction of invasive species during and after fire suppression operations * Clean equipment of invasive species seeds before moving equipment off road to build any firebreaks. * Seal all firebreaks to prevent vehicle access. * Minimize post-fire disturbance to burned areas to allow natural recovery. * Measurable recovery criteria to be established, monitored and met	

Topic Fire Management

Letter No./ Comment No.	Comment	Response
	before livestock grazing can resume on any sites. * Changes in livestock use, stocking rates and other grazing management must be undertaken to protect (as best as possible) the * Revegetation. All planned treatments must use only native species. The seed must be acquired in advance of undertaking any treatment. Locally adapted ecotypes must be used if at all possible. Focus must be on plants that will actually grow (such as small native Poas), and not large cattle forage-producing species. * Following fire or other disturbance, do not propose reseeding unless it can be shown that natural regeneration is unlikely. In post-wildfire situations, place highest priority on re-seeding native species. Only use exotics if alternatives are not available. Then, use exotic bunchgrasses – that mimic structure of native plant community. Do NOT seed intermediate wheatgrass. It is virtually impossible to remove from a site once established. Any sites seeded to exotics on an emergency basis must be prioritized for ultimate removal of exotics and re-seeding with native species. Availability of native seeds should be assured by establishing a contract system that will provide growers (local?) the necessary assurance that native, locally-adapted seed/plants will be purchased if grown. Determine, in landscape, and watershed assessments, the feasibility of providing habitat for wildlife or plant species that have been extirpated.	

Topic Travel and Access

18 / 001	Roads: The DEIS recognizes as "roads" too many oldvehicle tracks that have not been built or maintained, and that serve no public purpose. We urge BLM and NPS to distinguish between legitimate reads and jeep tracks out in the sagebrush.	See Chapter 3 (DEIS Pg. 112) Land Use and Transportation/Travel and Access. In response to public comment concerning a lack of clarity in the Draft Management Plan / Environmental Impact Statement, road and trail definitions have been refined (See Proposed Plan/FEIS Chapter 3, Land Use and Transportation/Travel and Access, Road and Trail Definitions). These definitions apply to a road and trail inventory based on best available data at the time of this draft which includes 1:24000 USGS topographic maps, BLM 1:100,000 topographic maps and a 2002 survey of roads, ways and trails in and around existing wilderness study areas. See Chapter One, Future Planning Needs, Transportation Planning. In the proposed Management Plan we describe desired

Topic Travel and Access

Letter No./ Comment No.	Comment	Response
		future conditions and management actions for the type of roads and access that is appropriate within each of four management zones. The plan also classifies and inventories the type of roads and trails currently in existence within the Monument. Specific decisions on Access and Transportation beyond those already defined in the management zone descriptions will be made in the upcoming implementation level Comprehensive Travel Management Plan. This implementation plan will include a detailed map including all designations for Travel and Access within the Monument, including road travel restrictions and road closures to meet resource management objectives, such as protection of special status species habitat, defined in the Proposed Plan/FEIS. There will be no net increase in road mileage under this plan
142 / 001	Although the DEIS appears to meet the requirements set forth by the National Environmental Policy Act, I believe it needs a stronger definition of a road to more clearly state which routes will permit motorized travel. I would also like to urge the agencies to adopt Alternative C as the preferred alternative for management of the Monument and preserve over the next 15-20 years.	See Chapter 3 (DEIS Pg. 112) Land Use and Transportation/Travel and Access. In response to public comment concerning a lack of clarity in the Draft Management Plan / Environmental Impact Statement, road and trail definitions have been refined (See Chapter 3, Land Use and Transportation/Travel and Access, Road and Trail Definitions). These definitions apply to a road and trail inventory based on best available data at the time of this draft which includes 1:24000 USGS topographic maps, BLM 1:100,000 topographic maps and a 2002 survey of roads, ways and trails in and around existing wilderness study areas.
101 / 001	I support leaving existing trails and roads open for public access. I strongly support the Minidoka/Arco road as a passage route. I believe that the best multiple use is Plan B. although some minor modifications outlined in Plan D may be appropriate. It is inconceivable that access would be denied to 750,000 acres. I am opposed to degradation of the Monument but think the public needs to be able to see all the features available. A sound plan that has good signage and improved roads would be appropriate. Access from the south is important due to the natural attraction of the Monument. A loop including the Minidoka/Arco and Kimimah/Carey roads should be included and was supported by then Interior Secretary Babbitt at the original hearings. Hunting in the Preserve can not be utilized without access. The road improvements would enhance the safety of visitors and others and provide better fire and emergency protection.	Upgrading or maintaining the Arco-Minidoka Road to a higher standard is not a management recommendation in the Proposed Plan/FEIS, however the dashed Passage Zone within the Monument would allow for improvements should the responsible county governments decide to upgrade the Arco-Minidoka Road in the future. See DEIS heading of Chapter 2, Alternative D, Travel and Access. See Chapter One, Future Planning Needs, Transportation Planning. In the Proposed Plan/FEIS we describe desired future conditions and management actions for the type of roads and access that is appropriate within each of four management zones. The plan also classifies and inventories the type of roads and trails currently in existence within the Monument. Specific decisions on Access and Transportation beyond those already defined in the management zone descriptions will be made in the upcoming implementation level Comprehensive Travel Management Plan. This implementation plan

Topic Travel and Access

Letter No./ Comment No.	Comment	Response
		will include a detailed map including all designations for access and travel within the Monument, including road travel restrictions and road closures to meet resource management objectives, such as protection of special status species habitat, defined in the Proposed Plan. There will be no net increase in road mileage under this plan.
137 / 001	Hunting should be allowed in the BLM managed areas within the Monument, but roads or trails should not be developed in the more Pristine regions where special geological features need to be preserved and protected.	In the Proposed Plan/FEIS we have adopted an expanded Pristine Zone similar to Alternative C, which will afford the most passive protection to geologic resources through limited access. The preserve portions of the Monument, which makes up the majority of the Pristine Zone will still allow hunting, the only part of the Monument closed to hunting is the old original Monument.
116 / 001	I feel strongly disappointed in having the preferred management option to be designated be Alternative O. This option allows an unacceptable level of aggressive restoration, weed control, and fire management. Worst of all, Alternative 0 contains a vague definition of roads that will most certainly lead to increased off-road vehicle (OHV) use. That use damages the wilderness values and special geologic features which were intended to be protected. I want to point out that what disappoints me about the Alternative O road classifications and definitions used in the analysis, is that they appear to be arbitrary, and worst of all, even contrary to the intent of the Clinton Presidential Proclamation. I find it unacceptable that under Alternative O there is egregious classification of unauthorized, unmaintained, user-created "two tracks" as roads. These unauthorized and unplanned routes are not "roads," and it is important that they be eradicated and restored to natural conditions.	See Chapter 3 (DEIS Pg. 112) Land Use and Transportation/Travel and Access. In response to public comment concerning a lack of clarity in the Draft Management Plan / Environmental Impact Statement, road and trail definitions have been refined (See Chapter 3, Land Use and Transportation/Travel and Access, Road and Trail Definitions). These definitions apply to a road and trail inventory based on best available data at the time of this draft which includes 1:24000 USGS topographic maps, BLM 1:100,000 topographic maps and a 2002 survey of roads, ways and trails in and around existing wilderness study areas. See Chapter One, Future Planning Needs, Transportation Planning. In the proposed Management Plan we describe desired future conditions and management actions for the type of roads and access that is appropriate within each of four management zones. The plan also classifies and inventories the type of roads and trails currently in existence within the Monument. Specific decisions on Access and Transportation beyond those already defined in the management zone descriptions will be made in the upcoming implementation level Comprehensive Travel Management Plan. This implementation plan will include a detailed map including all designations for Travel and Access within the Monument, including road travel restrictions and road closures to meet resource management objectives, such as protection of special status species habitat, defined in the Proposed Plan/FEIS. There will be no net increase in road mileage under this plan.
142 / 001	Although the DEIS appears to meet the requirements set forth by the National Environmental Policy Act, I believe it needs a stronger definition of a road to more clearly state which routes will permit motorized travel.	See Chapter 3 (DEIS Pg. 112) Land Use and Transportation/Travel and Access. In response to public comment concerning a lack of clarity in the Draft Management Plan / Environmental Impact Statement, road and trail definitions have been refined (See Chapter 3, Land Use

Topic Travel and Access

Letter No./ Comment No.	Comment	Response
		and Transportation/Travel and Access, Road and Trail Definitions). These definitions apply to a road and trail inventory based on best available data at the time of this draft which includes 1:24000 USGS topographic maps, BLM 1:100,000 topographic maps and a 2002 survey of roads, ways and trails in and around existing wilderness study areas.
14 / 001	In analyzing impacts, the EIS should reflect that any type of structure or road in this type of terrain can be seen from a long way off, so their impacts affect visitors in the pristine areas, many miles away from the actual site.	Please refer to DEIS, Chapter 2, page 41, Definition of Visual Resource Management Classes.
70 / 001	the selected alternative will increase roads and road maintenance while at the same time acknowledging that roads are primary contributors to wildfire, weed transportation and increased visitor use. The use of corridor Passage Zones in the pristine areas has the same effect as treating the whole pristine area as a roading opportunity.	In response to this comment and many others expressing either support for increasing or decreasing the amount of area included in the Passage Zone, as well as additional consideration of the environmental consequences, the agencies modified the areas contained in the Passage Zone in Alternative D as presented herein as the Proposed Plan.
15 / 001	In regard to your study of the craters of the moon lava flow. Concerning access of existing trails, and roads, as was stated at your meeting of 5/13/04. After reading and hearing the discussion of the three proposals, I feel that all exciting trails, and roads, should be left open to motorized vehicles as they are now. These roads were built by my grandfather George Pfnister, and other neighbors in the area in the early 1900's. They did this as an access to harvest cedar posts for fencing their farms. They had just homesteaded these farms. The roads have been in use from then until now. It has been many years since cedar posts have…	See Chapter One, Future Planning Needs, Transportation Planning. In the proposed Management Plan we describe desired future conditions and management actions for the type of roads and access that is appropriate within each of four management zones. The plan also classifies and inventories the type of roads and trails currently in existence within the Monument. Specific decisions on Access and Transportation beyond those already defined in the management zone descriptions will be made in the upcoming implementation level Comprehensive Travel Management Plan. This implementation plan will include a detailed map including all designations for access and travel within the Monument, including road travel restrictions and road closures to meet resource management objectives, such as protection of special status species habitat, defined in the Proposed Plan. There will be no net increase in road mileage under this plan.
26 / 001	The City of Heyburn supports the Arco-Minidoka Road improvements. We believe this road will offer many economic opportunities for this area.	Upgrading or maintaining the Arco-Minidoka Road to a higher standard is not a management recommendation in the Proposed Plan/FEIS, however the dashed Passage Zone within the Monument would allow for improvements should the responsible county governments decide to upgrade the Arco-Minidoka Road in the future. See DEIS heading of Chapter 2, Alternative D, Travel and Access.

Topic Travel and Access

Letter No./ Comment No.	Comment	Response
1 / 001	I believe that the only way to prevent the damage from becoming even more extensive is to close the Wood Road Kipuka trail to all motorized traffic, from the trailhead beyond. To allow motorized traffic past that point is almost to invite abuse through either ignorance of the law or a disregard for it. Given the present evidence of illegal traffic, past the trailhead it is almost impossible to control off-highway vehicle in any sort of meaningful way, especially given the sparse resources available to you for enforcement of this and other laws and regulations in managing the Monument.	The Wood Road Kipuka trail is closed to motorized vehicles and has been since 1980 when this area was included in the Great Rift Wilderness Study Area designation. In two of the draft alternatives, including the Preferred Alternative, this area would be zoned Pristine and no roads or motorized vehicle trails would be permitted. The agencies acknowledge that enforcement of this particular motorized vehicle closure has been lacking.
92 / 001	The current development already gives the general publicenough access to the Monument. The recent additions to the Monument must remain undeveloped and people who wish to explore these areas must be able to experience a pristine wilderness. No new roads should be developed and many of the existing roads should be closed. Any remaining roads should also have restrictions to minimize motorized recreation.	See Chapter 2, Alternative D Description and Map. In the Proposed Alternative, Passage Zone was significantly reduced in response to public comment and after additional consideration of the potential impacts to resources. Creating Passage Zone corridors does not mandate an increase in the number or current standard of roads (See chapter 2, Description of Management Zones). See Chapter One, Future Planning Needs, Transportation Planning. In the proposed Management Plan we describe desired future conditions and management actions for the type of roads and access that is appropriate within each of four management zones. The plan also classifies and inventories the type of roads and trails currently in existence within the Monument. Specific decisions on Access and Transportation beyond those already defined in the management zone descriptions will be made in the upcoming implementation level Comprehensive Travel Management Plan. This implementation plan will include a detailed map including all designations for access and travel within the Monument, including road travel restrictions and road closures to meet resource management objectives, such as protection of special status species habitat, defined in the Proposed Plan. There will be no net increase in road mileage under this plan.
120 / 001	While the National Park/BLM preferred alternative, Alternative D, supports aggressive weed control, fire management, and restoration, this proposal would further develop roads. Roads, as you know, will actually increase the threat of noxious weeds and fire risk and will accelerate development for visitor use and recreation.	See Chapter One, Future Planning Needs, Transportation Planning. In the proposed Management Plan we describe desired future conditions and management actions for the type of roads and access that is appropriate within each of four management zones. The plan also classifies and inventories the type of roads and trails currently in existence within the Monument. Specific decisions on Access and Transportation beyond those already defined in the management zone descriptions will be made in the upcoming implementation level

Topic Travel and Access

Letter No./ Comment No.	Comment	Response
		Comprehensive Travel Management Plan. This implementation plan will include a detailed map including all designations for access and travel within the Monument, including road travel restrictions and road closures to meet resource management objectives, such as protection of special status species habitat, defined in the Proposed Plan. There will be no net increase in road mileage under this plan.
42 / 001	I am writing in support of the improvement of the Minidoka-Arco Road. I feel it is important to have a good road" so searches can be conduced. I also feel the road needs to be in good order for not only S&R, but law enforcement, fire, and EMS. For the general public I also believe that there should be access to existing roads and trails.	Upgrading or maintaining the Arco-Minidoka Road to a higher standard is not a management recommendation in the Proposed Plan/FEIS, however the dashed Passage Zone within the Monument would allow for improvements should the responsible county governments decide to upgrade the Arco-Minidoka Road in the future. See DEIS heading of Chapter 2, Alternative D, Travel and Access.
10 / 001	We understand that the designation of the Monument/Preserve has, and will continue to, create demand for public access. We believe it is the obligation of responsive government and the clarion call of orderly planning to provide for the essential needs of the public. We see the need for adequate, appropriate and safe access to such significant places of public interest and history, which the Monument/Preserve constitutes, as the type of need deserving the utmost attention. We have also been advised by the Mini-Cassia Transportation Committee in this matter. We heartily agree with the Committee's recommendations that Alternative (D) is the preferred option, and should include limited options in Alternative (B), to-wit: 1) including the entire Arco-Minidoka Road as a "passage" route; and 2) including the entire Carey-Kamima Road as a "passage" route. By adopting this Alternative, with designated options, we are confident that you would be serving the best interests of all citizens especially those seeking access to view our interesting and historic landscape.	Upgrading or maintaining the Arco-Minidoka Road to a higher standard is not a management recommendation in the Proposed Plan/FEIS, however the dashed Passage Zone within the Monument would allow for improvements should the responsible county governments decide to upgrade the Arco-Minidoka Road in the future. See DEIS heading of Chapter 2, Alternative D, Travel and Access.
27 / 001	We would urge that you include the entire Arco-Minidoka Road as a "passage" route and that you include the entire Carey-Kimama Road as a "passage" route. The recent change to the area makes it a much more desirable destination as a NPS Visitor Center. We often hear of people that drive the present route and have trouble because they do not realize how poor the route is. We also have been made aware that the better route would facilitate safety and fire suppression and that is a major reason for the improvement.	Upgrading or maintaining the Arco-Minidoka Road to a higher standard is not a management recommendation in the Proposed Plan/FEIS, however the dashed Passage Zone within the Monument would allow for improvements should the responsible county governments decide to upgrade the Arco-Minidoka Road in the future. See DEIS heading of Chapter 2, Alternative D, Travel and Access.

Topic Travel and Access

Letter No./ Comment No.	Comment	Response
29 / 001	The City of Minidoka would like to express our support and desire to have the road from Minidoka to Arco improved. We would very much like to see the road suitable for all vehicles, as we have numerous tourists stopping for directions to Arco and we have to turn them around and discourage desert travel. We truly feel this road would benefit not only travelers, but destinations on both ends.	Upgrading or maintaining the Arco-Minidoka Road to a higher standard is not a management recommendation in the Proposed Plan/FEIS, however the dashed Passage Zone within the Monument would allow for improvements should the responsible county governments decide to upgrade the Arco-Minidoka Road in the future. See DEIS heading of Chapter 2, Alternative D, Travel and Access.
9 / 001	It is proposed that the following items from AlternativeB be included in Alternative D: 1.) Include the entire Arco-Minidoka Road as a "passage" route. 2.) Include the entire Carey-Kimama Road as a "passage" route. We are adamant in our support for the Arco-Minidoka route. The Monument/Preserve designation has created a demand by the public for access. The road from Minidoka will become an attractive alternative to those wanting to go through the Monument/Preserve and to have that as an alternative to reaching the NPS Visitor Center. People will attempt to use the existing road with potential catastrophic results so it must be adequate.	Upgrading or maintaining the Arco-Minidoka Road to a higher standard is not a management recommendation in the Proposed Plan/FEIS, however the dashed Passage Zone within the Monument would allow for improvements should the responsible county governments decide to upgrade the Arco-Minidoka Road in the future. See DEIS heading of Chapter 2, Alternative D, Travel and Access.
8 / 001	After reviewing your DEIS, it wouldappear to be important that the Alternative (D) should include parts of options in Alternative (B). The entire Arco-Minidoka road as a "passage" route and Carey-Kimama as a "passage" route are important to the people wanting to go through the Monument/Preserve and to have that as an alternative to reaching the NPS Visitor Center.	In response to this comment and many others expressing either support for increasing or decreasing the amount of area included in the Passage Zone, as well as additional consideration of the environmental consequences, the agencies modified the areas contained in the Passage Zone in Alternative D as presented herein as the Proposed Plan.
104 / 001	A map should be provided that shows the Pristine Zone roads and trails as well as a map for Class II Trails open to single-track motorized use. The specific purpose and need for each road also needs to be descried in the FEIS, along with the risks associated with each road. Examples of use include administrative use for restoration, recreational two-track use, recreational gravel use, recreational paved use. Examples of risk for each segment include wildlife habitat fragmentation, noxious weed spread, increased grazing developments, vandalism of cultural and geological resources, and incompatibility with pristine recreational experiences.	See Chapter One, Future Planning Needs, Transportation Planning. In the proposed Management Plan we describe desired future conditions and management actions for the type of roads and access that is appropriate within each of four management zones. The plan also classifies and inventories the type of roads and trails currently in existence within the Monument. Specific decisions on Access and Transportation beyond those already defined in the management zone descriptions will be made in the upcoming implementation level Comprehensive Travel Management Plan. This implementation plan will include a detailed map including all designations for access and travel within the Monument, including road travel restrictions and

Topic Travel and Access

Letter No./ Comment No.	Comment	Response
		road closures to meet resource management objectives, such as protection of special status species habitat, defined in the Proposed Plan. There will be no net increase in road mileage under this plan.
122 / 001	We urge NPS/BLM to develop a Management Plan that blends Alternatives C and D, one that places a greater emphasis on non-motorized access and protection of the primitive character of the Monument while still pursuing an active and effective restoration program. The Preferred Alternative does not adequately protect the primitive character of the Monument. The presence of unique geological and biological features, extensive road-free or relatively road-free areas, and the lack of easy motorized access are what make the Monument nationally-significant. While we applaud the agencies' recognition of the need for conducting restoration work in degraded areas, this work cannot be done at the risk of inadvertently encouraging rising levels of motorized use in the Monument. The real long-term legacy of the Monument expansion will be the preservation of large areas of sagebrush steppe and lava flows that are both ecologically healthy and allow for primitive recreational and hunting experiences. We are in opposition to the approach to roads and motorized trails embodied in the Preferred Alternative. There is simply too much risk that there will be an increase in motorized use of trails and roads that currently see very seasonal and limited vehicular use. The quantity of access appears to be more of a concern than providing high quality experiences. While we support active restoration measures, BLM/NPS must find ways to minimize and reduce, not maintain or even increase, the number of roads available for motorized use.	See Chapter One, Future Planning Needs, Transportation Planning. In the proposed Management Plan we describe desired future conditions and management actions for the type of roads and access that is appropriate within each of four management zones. The plan also classifies and inventories the type of roads and trails currently in existence within the Monument. Specific decisions on Access and Transportation beyond those already defined in the management zone descriptions will be made in the upcoming implementation level Comprehensive Travel Management Plan. This implementation plan will include a detailed map including all designations for access and travel within the Monument, including road travel restrictions and road closures to meet resource management objectives, such as protection of special status species habitat, defined in the Proposed Plan. There will be no net increase in road mileage under this plan. In addition, the Proposed Management Plan is in fact a combination of Alternatives C and D. The Passage Zone is decreased, with the Pristine Zone increased. We have incorporated your comments, see changes to Alternative D.
38 / 001	The Mini-Cassia Economic Development Commission supports the proposed extension of a highway from Minidoka to Arco. This addition will provide an economic impact to the community of Minidoka and provide a safe and more economical means for locals and tourists to travel from our area to the National Monument.	Upgrading or maintaining the Arco-Minidoka Road to a higher standard is not a management recommendation in the Proposed P/FEISlan, however the dashed Passage Zone within the Monument would allow for improvements should the responsible county governments decide to upgrade the Arco-Minidoka Road in the future. See DEIS heading of Chapter 2, Alternative D, Travel and Access.
121 / 001	…and trails and begun its planning process from there. We believe this, coupled with the policy of defining any obviously-traveled vehicular path as a road, will inevitable result in unnecessarily	See Chapter One, Future Planning Needs, Transportation Planning. In the proposed Management Plan we describe desired future conditions and management actions for the type of roads and access that is

Letter No./ Comment No.	Comment	Response
	excessive roads and motorized travel, roads and travel which will almost inevitably function as vectors for and causes of such undesirable events as human-caused fire and the introduction of exotic species. We encourage the team instead to start with a blank map, and then to determine which roads are necessary for providing visitor access to specific sites or for other desirable visitor opportunities. Routes which are not necessary to provide general public access should be closed to the public while allowing individuals with specific needs to utilize normally-closed routes to do so by administrative permission. We believe…	appropriate within each of four management zones. The plan also classifies and inventories the type of roads and trails currently in existence within the Monument. Specific decisions on Access and Transportation beyond those already defined in the management zone descriptions will be made in the upcoming implementation level Comprehensive Travel Management Plan. This implementation plan will include a detailed map including all designations for access and travel within the Monument, including road travel restrictions and road closures to meet resource management objectives, such as protection of special status species habitat, defined in the Proposed Plan. There will be no net increase in road mileage under this plan.
64 / 001	While I support aggressive weed control, fire management,and restoration, the proposal to further develop roads will actually increase the threat of noxious weeds and fire risk, as well as accelerate damage to wilderness values and geologic features.	Analysis in the DEIS (Ch. 4) acknowledges the risk of increased road improvement relative to weed infestation, fire risk, wilderness values and geologic features. In response to comments such as this the ID team reduced the amount of Passage Zone in the Proposed Plan/FEIS, particularly in Laidlaw Park. The implementation plan for transportation will address road maintenance and improvement within specific areas and zones of the Monument, with consideration to
63 / 002	Worst of all, Alternative D contains a vague definition of roads that will most certainly lead to increased off-road vehicle (OHV) use. That use damages the wilderness values and special geologic features which were intended to be protected. I want to point out that what disappoints me about the Alternative D road classifications and definitions used in the analysis, is that they appear to be arbitrary, and worst of all, even contrary to the intent of the Clinton Presidential Proclamation. I find it unacceptable that under Alternative D there is egregious classification of unauthorized, unmaintained, user-created "two tracks" as roads. These unauthorized and unplanned routes are not "roads," and it is important that they be eradicated and restored to natural conditions.	See Chapter 3 (DEIS Pg. 112) Land Use and Transportation/Travel and Access. In response to public comment concerning a lack of clarity in the Draft Management Plan / Environmental Impact Statement, road and trail definitions have been refined (See Chapter 3, Land Use and Transportation/Travel and Access, Road and Trail Definitions). These definitions apply to a road and trail inventory based on best available data at the time of this draft which includes 1:24000 USGS topographic maps, BLM 1:100,000 topographic maps and a 2002 survey of roads, ways and trails in and around existing wilderness study areas. See Chapter One, Future Planning Needs, Transportation Planning. In the proposed Management Plan we describe desired future conditions and management actions for the type of roads and access that is appropriate within each of four management zones. The plan also classifies and inventories the type of roads and trails currently in existence within the Monument. Specific decisions on Access and Transportation beyond those already defined in the management zone descriptions will be made in the upcoming implementation level Comprehensive Travel Management Plan. This implementation plan will include a detailed map including all

Topic Travel and Access

Letter No./ Comment No.	Comment	Response
		designations for Travel and Access within the Monument, including road travel restrictions and road closures to meet resource management objectives, such as protection of special status species habitat, defined in the Proposed Plan/FEIS. There will be no net increase in road mileage under this plan.
18 / 002	The plan should cut back on vehicle access through the Monument, retaining only routes that serve a purpose consistent with the Monument mandate, and closing and rehabilitating all other vehicle tracks. We urge that the Arco-Minidoka road not be upgraded or paved, as it introduces vehicle traffic too close to the primitive and Pristine Zones.	See Chapter One, Future Planning Needs, Transportation Planning. In the proposed Management Plan we describe desired future conditions and management actions for the type of roads and access that is appropriate within each of four management zones. The plan also classifies and inventories the type of roads and trails currently in existence within the Monument. Specific decisions on Access and Transportation beyond those already defined in the management zone descriptions will be made in the upcoming implementation level Comprehensive Travel Management Plan. This implementation plan will include a detailed map including all designations for access and travel within the Monument, including road travel restrictions and road closures to meet resource management objectives, such as protection of special status species habitat, defined in the Proposed Plan. There will be no net increase in road mileage under this plan. Upgrading or maintaining the Arco-Minidoka Road to a higher standard is not a management recommendation in the Proposed Plan/FEIS, however the dashed Passage Zone within the Monument would allow for improvements should the responsible county governments decide to upgrade the Arco-Minidoka Road in the future. See DEIS heading of Chapter 2, Alternative D, Travel and Access.
15 / 002	…they carved out this precious way of life that we enjoy today. I have some concerns about the wilderness study that brought about these three proposals. After talking to the Monument manager Jim Morris, and the director of the B.L.M. office I discovered that they had located very few of the exciting roads and trails. This leads me to believe that the study was not very thorough. I would like our heritage that we have in this area to remain available for many years to come.	See Chapter 3 (DEIS Pg. 112) Land Use and Transportation/Travel and Access. In response to public comment concerning a lack of clarity in the Draft Management Plan / Environmental Impact Statement, road and trail definitions have been refined (See Chapter 3, Land Use and Transportation/Travel and Access, Road and Trail Definitions). These definitions apply to a road and trail inventory based on best available data at the time of this draft which includes 1:24000 USGS topographic maps, BLM 1:100,000 topographic maps and a 2002 survey of roads, ways and trails in and around existing wilderness study areas.

Topic Travel and Access

Letter No./ Comment No.	Comment	Response
70 / 002	We need a map showing the Pristine Zone roads andtrails. In general roads in the Pristine area should be restricted or eliminated P. 116: Class II Trails open to single track motorized use needs a map so we can see where they are and make appropriate comments.	See Chapter One, Future Planning Needs, Transportation Planning. In the proposed Management Plan we describe desired future conditions and management actions for the type of roads and access that is appropriate within each of four management zones. The plan also classifies and inventories the type of roads and trails currently in existence within the Monument. Specific decisions on Access and Transportation beyond those already defined in the management zone descriptions will be made in the upcoming implementation level Comprehensive Travel Management Plan. This implementation plan will include a detailed map including all designations for access and travel within the Monument, including road travel restrictions and road closures to meet resource management objectives, such as protection of special status species habitat, defined in the Proposed Plan. There will be no net increase in road mileage under this plan. In addition: See alternative maps for transportation network. All roads within Pristine Zone will be closed by this plan. No Class II trails currently exist in the Monument.
14 / 002	…have not been considered roads at all. We ask BLM and NPS to modify the plan to close and revegetate all vehicle routes that do not serve the purposes for which the Monument was established. We would favor the approach NPS has taken in other national monuments and national parks, strictly controlling vehicle access to protect the resource. The time has long passed when a spiderweb of jeep tracks can be allowed to mar this wonderful Monument area.	See Chapter One, Future Planning Needs, Transportation Planning. In the proposed Management Plan we describe desired future conditions and management actions for the type of roads and access that is appropriate within each of four management zones. The plan also classifies and inventories the type of roads and trails currently in existence within the Monument. Specific decisions on Access and Transportation beyond those already defined in the management zone descriptions will be made in the upcoming implementation level Comprehensive Travel Management Plan. This implementation plan will include a detailed map including all designations for access and travel within the Monument, including road travel restrictions and road closures to meet resource management objectives, such as protection of special status species habitat, defined in the Proposed Plan. There will be no net increase in road mileage under this plan.

Topic Travel and Access

Letter No./ Comment No.	Comment	Response
120 / 002	…then maintain Primitive Zones, with a minimum of passage and use. Management goals should include road closure and rehabilitation.	See Chapter One, Future Planning Needs, Transportation Planning. In the proposed Management Plan we describe desired future conditions and management actions for the type of roads and access that is appropriate within each of four management zones. The plan also classifies and inventories the type of roads and trails currently in existence within the Monument. Specific decisions on Access and Transportation beyond those already defined in the management zone descriptions will be made in the upcoming implementation level Comprehensive Travel Management Plan. This implementation plan will include a detailed map including all designations for access and travel within the Monument, including road travel restrictions and road closures to meet resource management objectives, such as protection of special status species habitat, defined in the Proposed Plan. There will be no net increase in road mileage under this plan.
104 / 002	It seems highly contradictory to propose increasing the Passage Zone in Alternative D from 4800 acres to 9900 acres for the sake of restoration efforts, when the very problems that are targeted for remediation are due in large part to the introduction of roads in previously unroaded areas. This historical problem is noted in the discussion of noxious weeds. The increase in vehicular traffic as well as grazing from increased access to remote areas provided by this alternative would exacerbate this problem further. It seems particularly misleading to suggest that "...impacts from damage, theft, and vandalism near roads and trails would be likely to be similar to those of Alternative A" when access increases significantly under Alternative D (P. 157). There seems to be a presumption that there will be no increased use of roads in spite of the fact the roads will be improved to enhance delivery of administrative (weed control/restoration) and fire services. Yet in the discussion on WSA's, the plan states "the level of illegal off-road use would be higher near access roads." The impacts from this expansion of access should be classified as major instead of "negligible to potentially major".	See Chapter 3 (DEIS Pg. 112) Land Use and Transportation/Travel and Access. In response to public comment concerning a lack of clarity in the Draft Management Plan / Environmental Impact Statement, road and trail definitions have been refined (See Chapter 3, Land Use and Transportation/Travel and Access, Road and Trail Definitions). These definitions apply to a road and trail inventory based on best available data at the time of this draft which includes 1:24000 USGS topographic maps, BLM 1:100,000 topographic maps and a 2002 survey of roads, ways and trails in and around existing wilderness study areas. See Chapter 2, Alternative D Description and Map. In the Proposed Alternative, Passage Zone was significantly reduced in response to public comment and after additional consideration of the potential impacts to resources. Creating Passage Zone corridors does not mandate an increase in the number or current standard of roads (See chapter 2, Description of Management Zones).

Topic Travel and Access

Letter No./ Comment No.	Comment	Response
21 / 002	Unnecessary roads identified during the planning process should be marked for closure and restoration to natural conditions. Under no circumstances should unofficial, user-created roads be designated as official roads, provided and maintained, or marked in any way with signs or on Monument maps provided to visitors. Such unofficial roads should be marked for closure and restoration.	See Chapter One, Future Planning Needs, Transportation Planning. In the proposed Management Plan we describe desired future conditions and management actions for the type of roads and access that is appropriate within each of four management zones. The plan also classifies and inventories the type of roads and trails currently in existence within the Monument. Specific decisions on Access and Transportation beyond those already defined in the management zone descriptions will be made in the upcoming implementation level Comprehensive Travel Management Plan. This implementation plan will include a detailed map including all designations for access and travel within the Monument, including road travel restrictions and road closures to meet resource management objectives, such as protection of special status species habitat, defined in the Proposed Plan. There will be no net increase in road mileage under this plan.
121 / 002	…purposes. We believe that the planning team should reconsider its definition of a "road," as the majority of the roads identified as roads are not roads in any sort of common-sense definition, and do not correspond with the intent of the presidential proclamation. We wish to strongly emphasize that we believe that only those roads which have been constructed and maintained by means other than simple vehicular travel merit the definition of the term "road."	Upgrading or maintaining the Arco-Minidoka Road to a higher standard is not a management recommendation in the Proposed Plan/FEIS, however the dashed Passage Zone within the Monument would allow for improvements should the responsible county governments decide to upgrade the Arco-Minidoka Road in the future. See DEIS heading of Chapter 2, Alternative D, Travel and Access. See Chapter 3 (DEIS Pg. 112) Changes to Land Use and Transportation/Travel and Access. In response to public comment concerning a lack of clarity in road definitions in the Draft Management Plan / Environmental Impact Statement, road and trail definitions have been refined (See Chapter 3, Land Use and Transportation/Travel and Access, Road and Trail Definitions). These definitions apply to a road and trail inventory based on best available data at the time of this draft which includes 1:24000 USGS topographic maps, BLM 1:100,000 topographic maps and a 2002 survey of roads, ways and trails in and around existing wilderness study areas.

Topic Travel and Access

Letter No./ Comment No.	Comment	Response
105 / 002	The DEIS analysis is lacking in sound science and professional judgment to back up the conclusions reached in alternatives B and D. Predictions that increased access will have minimal negative impacts to Monument resources and values are based on an ideal situation where the agencies have huge budgets to provide for signs, staff, enforcement and monitoring. With the majority of road improvements located on BLM lands, one would think that the BLM would have the resources to pay for all of the necessary enforcement and monitoring. However, current management points to a problem of shared resources between the two agencies. This is likely to continue and the resources found on NPS managed lands are likely to suffer significant negative impacts due to increased access to BLM managed lands. NPS is not likely to get increased funding for monitoring and enforcement. BLM appears to want to spend money that is available on aggressive restoration, not on monitoring and enforcement throughout the Monument. To be clear, the management and budget decisions that are influencing these processes do not seem to be made by the staff of the Monument but are being made by state, regional and national agency staff as well as Congress.	The impact assessment is described separately and somewhat differently for different resources. For example, under Geologic Resources, it is recognized that road improvements could have potentially major long-term adverse impacts on resources such as caves due to increased numbers of visitors. However, in selecting the Proposed Plan/FEIS, the agencies have taken into consideration the expected impacts on resources and the agencies' future management capabilities to deal with such impacts. See Chapter One, Future Planning Needs, Transportation Planning. In the proposed Management Plan we describe desired future conditions and management actions for the type of roads and access that is appropriate within each of four management zones. The plan also classifies and inventories the type of roads and trails currently in existence within the Monument. Specific decisions on Access and Transportation beyond those already defined in the management zone descriptions will be made in the upcoming implementation level Comprehensive Travel Management Plan. This implementation plan will include a detailed map including all designations for access and travel within the Monument, including road travel restrictions and road closures to meet resource management objectives, such as protection of special status species habitat, defined in the Proposed Plan. There will be no net increase in road mileage under this plan.
106 / 003	I feel that there are already too many roads and access trails in and around the Monument. There is almost no difference in Class C and Class D roads and trails between Alternative C and D (637 versus 634 miles, respectively). I strongly prefer Alternative C, but with more emphasis in closing unimproved roads/trails and requiring access by foot only.	See Chapter One, Future Planning Needs, Transportation Planning. In the proposed Management Plan we describe desired future conditions and management actions for the type of roads and access that is appropriate within each of four management zones. The plan also classifies and inventories the type of roads and trails currently in existence within the Monument. Specific decisions on Access and Transportation beyond those already defined in the management zone descriptions will be made in the upcoming implementation level Comprehensive Travel Management Plan. This implementation plan will include a detailed map including all designations for access and travel within the Monument, including road travel restrictions and road closures to meet resource management objectives, such as protection of special status species habitat, defined in the Proposed Plan. There will be no net increase in road mileage under this plan.

Topic Travel and Access

Letter No./ Comment No.	Comment	Response
95 / 003	An aggressive herbicide program may not be the answer,when the spread of noxious weeds can be attributed directly to grazing procedures and roads. Upgrading roads in primitive areas will only increase this.	The DEIS acknowledges that roads, vehicles, humans, and animals are known vectors to the spread of noxious weeds (DEIS Ch. 3, Discussion on Noxious and Exotic Species, p. 92). A full Integrated Weed Management Program addresses a broad range of prevention, education, and control activities to combat noxious weeds (see DEIS p. 25 Management Guidelines Common to All Alternatives: Vegetation, Including Special Status Species, and Fire Management).
127 / 003	We also recognize access to the Monument is an issue with the development of the Arco- Minidoka road but with limited budgets, this would be our third priority.	While not specifically proposing any improvement to the Arco-Minidoka Road, the agencies, in the Proposed Plan/FEIS, allow for accommodating improvement to the section of the road within the Monument if, at a future time, the local authorities decide to improve the section of the Arco-Minidoka Road to the north of the Monument boundary.
2 / 003	The draft states that the NPS and BLM prefer Alternative D. This alternative supports road enhancements and building. In an effort to "safeguard the volcanic features and geologic processes for the Great Rift", it would seem that the preferred alternative D, opens up the Monument's land to commercial services and motor vehicles/ease of transporting to the…	See Chapter 2, Alternative D Description and Map. In the Proposed Alternative, Passage Zone was significantly reduced in response to public comment and after additional consideration of the potential impacts to resources. Creating Passage Zone corridors does not mandate an increase in the number or current standard of roads (See chapter 2, Description of Management Zones). In addition, The environmental analysis (Chapter 4) has been amended to include more discussion of the expected impact on these resources from improved access roads.
122 / 003	We urge NPS/BLM to adopt an alternative that would include a detailed travel plan with specific designations for those routes that would be available to motorized use. The travel plan should specifically articulate that all non-designated roads would be closed to motorized use, with the exception of specifically permitted management or administrative uses. The plan also should include details regarding how vehicles will be managed to ensure that non-motorized regulations are followed.	See Chapter One, Future Planning Needs, Transportation Planning. In the proposed Management Plan we describe desired future conditions and management actions for the type of roads and access that is appropriate within each of four management zones. The plan also classifies and inventories the type of roads and trails currently in existence within the Monument. Specific decisions on Access and Transportation beyond those already defined in the management zone descriptions will be made in the upcoming implementation level Comprehensive Travel Management Plan. This implementation plan will include a detailed map including all designations for access and travel within the Monument, including road travel restrictions and road closures to meet resource management objectives, such as protection of special status species habitat, defined in the Proposed Plan. There will be no net increase in road mileage under this plan.

Topic Travel and Access

Letter No./ Comment No.	Comment	Response
121 / 003	All alternatives must include a transportation plan and implementation timeline that identifies the actions, including road closures or travel restrictions, necessary to protect the resources identified in the establishment of the Monument. All alternatives must include an analysis of how the proposed management actions will protect or threaten sensitive natural, cultural, biological, or geological resources. The plan should provide for a comprehensive inventory, with timeline, of the resources to be protected by the management plan.	See Chapter One, Future Planning Needs, Transportation Planning. In the proposed Management Plan we describe desired future conditions and management actions for the type of roads and access that is appropriate within each of four management zones. The plan also classifies and inventories the type of roads and trails currently in existence within the Monument. Specific decisions on Access and Transportation beyond those already defined in the management zone descriptions will be made in the upcoming implementation level Comprehensive Travel Management Plan. This implementation plan will include a detailed map including all designations for access and travel within the Monument, including road travel restrictions and road closures to meet resource management objectives, such as protection of special status species habitat, defined in the Proposed Plan. There will be no net increase in road mileage under this plan.
105 / 003	The proclamation provides the agencies with a mandate to - • manage the area to preserve the Monument objects; • prohibit all motorized and mechanized vehicle use off road (except for emergency or authorized administrative purposes); and • prepare a transportation plan that addresses the actions, including road closures or travel restrictions, necessary to protect the objects The agencies' failure to present more detailed alternatives as proposed transportation networks in the DEIS is a failure to comply with the proclamation, as well as with obligations under applicable regulations. The proclamation requires the agencies to prepare a transportation plan that addresses actions needed to protect Monument objects, which includes determining roads to be closed and other travel restrictions. We urge the agencies to conduct a more comprehensive and specific recommendations to start travel management planning as part of this broad planning effort.	See Chapter One, Future Planning Needs, Transportation Planning. In the proposed Management Plan we describe desired future conditions and management actions for the type of roads and access that is appropriate within each of four management zones. The plan also classifies and inventories the type of roads and trails currently in existence within the Monument. Specific decisions on Access and Transportation beyond those already defined in the management zone descriptions will be made in the upcoming implementation level Comprehensive Travel Management Plan. This implementation plan will include a detailed map including all designations for access and travel within the Monument, including road travel restrictions and road closures to meet resource management objectives, such as protection of special status species habitat, defined in the Proposed Plan. There will be no net increase in road mileage under this plan.

Topic Travel and Access

Letter No./ Comment No.	Comment	Response
103 / 004	The road classifications and definitions used in the analysis appear to be arbitrary and contrary to the intent of the presidential Proclamation -for example, classification of unauthorized, unmaintained, user-created "two tracks" as roads.	See Chapter 3 (DEIS Pg. 112) Land Use and Transportation/Travel and Access. In response to public comment concerning a lack of clarity in the Draft Management Plan / Environmental Impact Statement, road and trail definitions have been refined (See Chapter 3, Land Use and Transportation/Travel and Access, Road and Trail Definitions). These definitions apply to a road and trail inventory based on best available data at the time of this draft which includes 1:24000 USGS topographic maps, BLM 1:100,000 topographic maps and a 2002 survey of roads, ways and trails in and around existing wilderness study areas.
70 / 004	**..**roads in spite of the fact the roads will be improved to enhanced delivery of administrative (weed control/restoration) and fire services. Yet in the discussion on WSA's the plan states "the level of illegal off-road use would be higher near access roads." P. 217: same as above.. .i.e., illegal use would occur with improved access. The impact of the preferred alternative will be an increase and improved maintenance of roads and with that increase more visitor use and consequent impact. This needs to be acknowledged and dealt with.	Alternative D has been adjusted to decrease the miles of road within the Passage Zone. The impacts of that adjustment have been analyzed throughout the document.
120 / 004	Secondly, Blaine County is not interested in accepting responsibility for any more road maintenance in that region. To put it bluntly, the road issue is terribly overdone in Alternative D. Apparently much thought has been given to the idea…	Thank you for the comment. The plan, under “Management Common to All Alternatives” has been modified to clarify that no road upgrades or commitments to future maintenance of roads under the jurisdiction of county or highway districts would occur without that county or highway district concurrence.
104 / 004	All motorized travel should be restricted to roads designated through a planning process that considers natural and historical objects of interest in need of protection. Unnecessary reads identified during the planning process should be marked for closure and restored to natural conditions. The road classifications and definitions used in the analysis appear to be arbitrary and contrary to the purpose of the Presidential Proclamation. It is particularly troubling that unauthorized, unmaintained, user-created “two-track” trails are classified as roads. Under no circumstances should unofficial or user-created roads be designated as official roads, provided any maintenance, or marked in any way on maps provided for visitors. Such unofficial roads should be closed and restored.	See Chapter One, Future Planning Needs, Transportation Planning. In the proposed Management Plan we describe desired future conditions and management actions for the type of roads and access that is appropriate within each of four management zones. The plan also classifies and inventories the type of roads and trails currently in existence within the Monument. Specific decisions on Access and Transportation beyond those already defined in the management zone descriptions will be made in the upcoming implementation level Comprehensive Travel Management Plan. This implementation plan will include a detailed map including all designations for access and travel within the Monument, including road travel restrictions and road closures to meet resource management objectives, such as protection of special status species habitat, defined in the Proposed Plan. There will be no net increase in road mileage under this plan.

Topic Travel and Access

Letter No./ Comment No.	Comment	Response
73 / 004	In Chapter 4, Page 151 the draft covers the Lost River Off-Highway Vehicle Management Demonstration Project. The draft states "IDPR is seeking exemptions from licensing and insurance requirements for off-highway vehicle (OHV) travel on county roads and for crossing US 93." We are not seeking an exemption from insurance requirements under this proposal. Idaho Code 49-426 allows counties and highway district to exempt certain roads from the license plate requirements. It does not allow those counties to exempt roads from insurance requirements. The sentence needs to be reworded to read "IDPR is seeking an exemption from licensing requirements for off-highway (OHV) travel on county roads and for crossing US 93."	A text change was made to Proposed Plan/FEIS as suggested.
122 / 004	We strongly believe that NPS/BLM should adopt an alternative that emphasizes foot and horseback travel, facilitated through the use of licensed outfitters and guides who can help provide high quality experiences and would assist the agencies in protecting the Monument. These guiding services would also help bring additional sources of revenues to the local communities near the Monument.	The Proposed Management Plan will emphasize outfitters and guides for visitor experience and resource protection. Your comments have been considered, see changes to Alternative D. While Alternative D does not specifically emphasize foot and horse travel, it does not exclude these travel activities. Specific outfitting and guide plans are outside the scope of this overall Management Plan.
121 / 004	…should not seek to undermine its intent. All user-created roads, trails, ways and routes should be considered unauthorized and illegal intrusions into the landscape and should be immediately and permanently closed to motorized use. No new…	See Chapter One, Future Planning Needs, Transportation Planning. In the proposed Management Plan we describe desired future conditions and management actions for the type of roads and access that is appropriate within each of four management zones. The plan also classifies and inventories the type of roads and trails currently in existence within the Monument. Specific decisions on Access and Transportation beyond those already defined in the management zone descriptions will be made in the upcoming implementation level Comprehensive Travel Management Plan. This implementation plan will include a detailed map including all designations for access and travel within the Monument, including road travel restrictions and road closures to meet resource management objectives, such as protection of special status species habitat, defined in the Proposed Plan. There will be no net increase in road mileage under this plan.

Topic Travel and Access

Letter No./ Comment No.	Comment	Response
105 / 004	The agencies are also obligated to address off-road vehicle usage. Executive Order No. 11644 (1972) (as amended by Executive Order No. 11989 (1977)) required the agencies to make designations as to use of routes by off-road vehicles. BLM promulgated regulations that require the agency to "designate all public lands as either open, limited or closed to off road vehicles." 43 C.F.R. §8342.1. BLM is specifically obligated to make such designations in its RMP process, with public participation. 43 C.F.R. §8342.2. As explicitly stated by BLM regulations (43 C.F.R. § 8342.2(a)): The designation and redesignation of trails is accomplished through the resource management planning process described in Part 1600 of this Title. Current and potential impacts of specific vehicle types on all resources and uses in the planning area shall be considered in the process of preparing resource management plans, plan revisions, or plan amendments. In making designations, the agencies are obligated by both the Executive Orders and BLM's regulations (43 C.F.R. § 8342.1) to ensure that areas and trails are located: The agencies are also obligated to address off-road vehicle usage. Executive Order No. 11644 (1972) (as amended by Executive Order No. 11989 (1977)) required the agencies to make designations as to use of routes by off-road vehicles. BLM promulgated regulations that require the agency to "designate all public lands as either open, limited or closed to off road vehicles." 43 C.F.R. §8342.1. BLM is specifically obligated to make such designations in its RMP process, with public participation. 43 C.F.R. §8342.2. As explicitly stated by BLM regulations (43 C.F.R. § 8342.2(a)): The designation and redesignation of trails is accomplished through the resource management planning process described in Part 1600 of this Title. Current and potential impacts of specific vehicle types on all resources and uses in the planning area shall be considered in the process of preparing resource management plans, plan revisions, or plan amendments. In making designations, the agencies are obligated by both the Executive Orders and BLM's regulations (43 C.F.R. § 8342.1) to ensure that areas and trails are located: collection, and excessive erosion." (DEIS, p. 189). And, in the alternative, "keeping many cultural resources inaccessible" would provide a "beneficial effect." (DEIS, p. 188). In light of the agencies' obligation to protect the Monument and conduct travel planning, as well as their separate legal obligations to designate routes, the agencies should provide	See Chapter 3 (DEIS Pg. 112) Land Use and Transportation/Travel and Access. In response to public comment concerning a lack of clarity in the Draft Management Plan / Environmental Impact Statement, road and trail definitions have been refined (See Chapter 3, Land Use and Transportation/Travel and Access, Road and Trail Definitions). These definitions apply to a road and trail inventory based on best available data at the time of this draft which includes 1:24000 USGS topographic maps, BLM 1:100,000 topographic maps and a 2002 survey of roads, ways and trails in and around existing wilderness study areas. See Chapter One, Future Planning Needs, Transportation Planning. In the proposed Management Plan we describe desired future conditions and management actions for the type of roads and access that is appropriate within each of four management zones. The plan also classifies and inventories the type of roads and trails currently in existence within the Monument. Specific decisions on Access and Transportation beyond those already defined in the management zone descriptions will be made in the upcoming implementation level Comprehensive Travel Management Plan. This implementation plan will include a detailed map including all designations for Travel and Access within the Monument, including road travel restrictions and road closures to meet resource management objectives, such as protection of special status species habitat, defined in the Proposed Plan/FEIS. There will be no net increase in road mileage under this plan. Additionally see page 28 DEIS, Land Use and Transportation Common to All.

Topic Travel and Access

Letter No./ Comment No.	Comment	Response
	more specifics as part of this plan and begin to identify routes, specify closures, and provide a range of route density expectations. Further, the agencies are well aware of the existing and ongoing damage to the Monument objects that they are bound to protect from motorized use. Delay in the enforcement and monitoring of these known illegal routes and in the immediate emergency closure of roads and routes would allow this damage to continue and is unacceptable. As noted above, the proclamation (as well as interim management) closed the entirety of the Monument lands to all types of mechanized and motorized use "off road." The management plan cannot undo this restriction and should not seek to undermine its intent. As an initial matter, the agencies should distinguish routes or trails that are not roads. The legislative history of FLPMA provides a definition of a road, by providing a definition of "roadless" (H.R. Rep. No. 94-1163 at 17 (1976)): The word "roadless" refers to the absence of roads, which have been improved and maintained by mechanical means to insure relatively regular and continuous use. A way maintained solely by the passage of vehicles does not constitute a road. In addition, the Code of Federal Regulations (43 C.F.R. § 19.2(e)) establishes the following definition: An improved road that is suitable for public travel by means of four wheeled, motorized vehicles intended primarily for highway use. Any route not meeting these definitions is not a "road" and, under the proclamation, must not be open to motorized and mechanized travel. Based on these definitions, all user-created roads, trails, ways and routes should be considered unauthorized and illegal intrusions into the landscape and should be immediately and permanently closed to mechanized and/or motorized use under all alternatives. Under the road classification system used in the DEIS, Class 2 trails are open to motorized/mechanized travel in addition to other non-motorized/non-mechanized forms of travel. This use is prohibited by the proclamation, because it permits motorized use of trails, which do not meet the legal definition of a road. All Class 2 trails should be closed to motorized/mechanized use (except for limited emergency or administrative use as necessary) and converted to Class 1 trails through modification of the routes to prevent such improper uses. Class D roads are defined as "primitive roads that were not constructed, but established over time by the passage of motorized vehicles." Based	

Letter No./ Comment No.	Comment	Response
	on the legal definitions of a road, the Class D routes (which are user-created) are not roads and permitting vehicles to use these routes would violate the proclamations. All Class D roads should be closed to motorized/mechanized use (except for limited emergency or administrative use as necessary) and converted to Class 1 Trails. Class C roads are defined as unimproved, with a natural surface, which "may be either constructed or established over time by repeated passage of vehicles." Based on the legal definitions of a road, Class C routes that are user-created are not roads, so permitting vehicles to use these routes would violate the proclamations. All user-created Class C roads should be closed to motorized/mechanized use (except for limited emergency or administrative use as necessary) and converted to Class 1 Trails.	
165 / 004	Alternative D's proposed maintenance and reclassification of roads, and the planting of nonnative forage could retard recovery of native plant communities needed by sage grouse and other sage-obligate species. The DEIS has identified improved roads and the establishment and spread of non-native plant species as impacts to the system and yet has chosen an alternative that facilitates these actions more than other alternative(s). The maintenance of roads for the purposes of administrative and fire suppression will only facilitate the use of these roads by the public. This is a reoccurring process throughout the west that has shown to expedite the spread of noxious weeds and increase the frequency of man-made fires.	Analysis in the DEIS (Ch. 4) acknowledges the risk of increased road development relative to weed infestation. See Chapter 2, Alternative D Description and Map. In the Proposed Alternative, Passage Zone was significantly reduced in response to public comment and after additional consideration of the potential impacts to resources. Creating Passage Zone corridors does not mandate an increase in the number or current standard of roads (See chapter 2, Description of Management Zones). In response to comments such as this the ID team reduced the amount of Passage Zone in the Proposed Plan/FEIS, particularly in Laidlaw Park. The implementation plan for transportation will address road development within specific areas and zones of the Monument, with consideration to these and other issues. There is no guidance in the plan for "the planting of non-native forage." Overarching management guidance directing restoration in the Monument can be found on DEIS p. 25, Management Actions Common To All Alternatives: Vegetation, Including Special Status Species, and Fire Management. The use of native plants is emphasized in all restoration projects, pursuant to BLM policy and Executive Order 13112, Invasive Species, February 3, 1999, and only native species would be used on projects in the Pristine Zone.

Topic Travel and Access

Letter No./ Comment No.	Comment	Response
121 / 005	Depending on the risk posed to surrounding resources, an administrative use designation of certain existing roads may be an option for access limited to the permittee and the managing agencies. The terms and conditions of such special use and access must be clearly spelled out in the management plan.	See Chapter One, Future Planning Needs, Transportation Planning. In the proposed Management Plan we describe desired future conditions and management actions for the type of roads and access that is appropriate within each of four management zones. The plan also classifies and inventories the type of roads and trails currently in existence within the Monument. Specific decisions on Access and Transportation beyond those already defined in the management zone descriptions will be made in the upcoming implementation level Comprehensive Travel Management Plan. This implementation plan will include a detailed map including all designations for access and travel within the Monument, including road travel restrictions and road closures to meet resource management objectives, such as protection of special status species habitat, defined in the Proposed Plan. There will be no net increase in road mileage under this plan. Additionally, limited use designations will be added to the transportation plan.
105 / 005	In creating a transportation plan, the agencies should also incorporate the following: 1. Focus on Monument objects: We believe that the BLM and NPS must first inventory the objects of historic and scientific interest and other resources for which the Monument was created or which may be legally protected. The agencies' first priority is to protect the Monument objects and they are also bound to protect sensitive species, so identifying the location of Monument objects and sensitive species is the key to planning for their protection. Once the inventory is complete, the agencies can identify those objects or other resources that should be accessible to the public and at which levels, as well as which areas of the Monument require more extensive protection from motorized or mechanized vehicle use. A transportation system is important to allow for use and enjoyment of the Monument. However, to achieve the protective purposes of the Monument, the BLM and the NPS must establish a transportation system for use and enjoyment that permits visitors to get to specific destinations if vehicle use will not damage the area. The proclamation makes the Monument, and thus the objects it was designated to protect the dominant reservation. The BLM and NPS are required to protect these resources above other uses and, where possible, find lower impact ways to move visitors through	Thank you for your comments. They will be taken into consideration when the agencies develop a transportation plan for the Monument. This plan is expected to be developed in the first phase of Monument implementation-level plans. See Chapter One, Future Planning Needs, Transportation Planning. In the proposed Management Plan we describe desired future conditions and management actions for the type of roads and access that is appropriate within each of four management zones. The plan also classifies and inventories the type of roads and trails currently in existence within the Monument. Specific decisions on Access and Transportation beyond those already defined in the management zone descriptions will be made in the upcoming implementation level Comprehensive Travel Management Plan. This implementation plan will include a detailed map including all designations for Travel and Access within the Monument, including road travel restrictions and road closures to meet resource management objectives, such as protection of special status species habitat, defined in the Proposed Plan/FEIS. There will be no net increase in road mileage under this plan. See Chapter 3 (DEIS Pg. 112) Land Use and Transportation/Travel and Access. In response to public comment concerning a lack of clarity in the Proposed Plan/FEIS, road and trail definitions have been refined (See Chapter 3, Land Use and Transportation/Travel

Letter No./ Comment No.	Comment	Response
	more sensitive areas. 2. Only roads with a “destination” or other necessary use, should remain open: The agencies should determine what roads are necessary for access to appropriate Monument objects, where they should be located and the restrictions needed on timing and levels of use. The legal definition of a road, as discussed above, specifically excludes roads created solely by the passage of vehicles. The agencies should adopt this definition and use it as the basis for compliance with the proclamation’s prohibition against motorized and mechanized vehicle use “off-road.” For any road that the agencies are considering maintaining, the agencies should also inspect the condition of the road to ensure that it does not harm the Monument objects, landscape, natural and cultural resources, wildlife, wildlife habitat, wilderness, and other visitor experiences. Road density due to casual use has become a major problem in the Monument, in that numerous roads, ways, trails, and two-tracks that have developed from casual use. Many of these routes or trails must be closed immediately. If the agencies determine that any route meets the definition of a road, then they must evaluate it to determine whether the road can exist without harming the Monument objects and other resources. Also, duplicative roads, ways and trails should be evaluated, and if identified as a necessary access route, should be limited to the least environmentally damaging road. All other routes leading to the same place should be closed and revegetated, as well as posted, blocked or otherwise modified by the agencies to discourage continued use. Since over 70 percent of the Monument lands are Wilderness Study Areas, it is imperative that the agencies prohibit construction or creation of new routes in these areas. New roads, trails, ways or other routes are illegal as of the date that the Wilderness Study Area was established and cannot be developed as part of the planning process. User created roads, trails, ways and other routes must be considered an illegal incursion into the Monument. No new routes across the lava fields should be allowed. The management plan should designate specific roads as open or closed to motorized use. Some trails should be specifically designated for non-motorized use. Some of these trails should be outside of the WSAs to allow visitors the opportunity to visit some areas through a non-motorized experience. Non-motorized access should also be encouraged if any historical, cultural, biological, geological, paleontological or other significant	and Access, Road and Trail Definitions). These definitions apply to a road and trail inventory based on best available data at the time of this draft which includes 1:24000 USGS topographic maps, BLM 1:100,000 topographic maps and a 2002 survey of roads, ways and trails in and around existing wilderness study areas.

Topic Travel and Access

Letter No./ Comment No.	Comment	Response
	resources are at risk of vandalism and damage from motorized use. Consideration should also be given to limited use of roads if they are deemed critical access routes for a small number of livestock permittees. Depending on the risk posed to surrounding resources, an administrative use designation may be an option for access limited to the permittee and the managing agencies. The terms and conditions of such special use and access should be clearly spelled out in the management plan and should become a term and condition upon which the allotment is evaluated for compliance with the BLM's Rangeland Health Standards and Guidelines as developed through the RACs. Once critical and agreed upon access roads and trails are identified and a transportation network established through the planning process, the NPS and BLM should develop a travel map. This map should identify roads available for motorized vehicles and trails available for non-motorized uses. The map and additional visitor information should make it clear that off-road motorized use is prohibited to protect the resources in the Monument. This information should be readily available on user maps, kiosks or signs, and on the BLM and NPS web sites. The transportation plan, as part of the resource management plan, must mandate road closures when necessary to prevent the spread of invasive plant species and to protect cultural and geological resources and natural resources and wildlife habitats. Road closures may also be necessary at certain times to protect vegetation from fire caused by vehicles (e.g., catalytic converters). Overall, road, way and trail management should strive to eliminate unnecessary and little used routes. Any road improvements or developments should be analyzed for their potential significant impacts to the resources of the Monument. New roads should not be built and existing roads should not be significantly improved. Road maintenance should be minimal and conducted only when necessary for specific access or safety, but in no case should roads be upgraded or widened without proper analysis of potential environmental consequences. This is consistent with current BLM Interim Management Policy for National Monuments and NCAs, "Road improvements should be minimal and designed solely to correct those conditions that are unsafe or hazardous. Activities that maintain, as opposed to enhance, existing roads may be permissible." (DEIS p. 293) 3. Road classifications should be based on use of roads and not solely on manner of construction: Once the agencies identify roads	

Letter No./ Comment No.	Comment	Response
	(using the legal definition of roads), they should classify the roads by use. The classifications included in the current DEIS are based on the way that roads are constructed and, to some extent, maintained. In determining those roads that should be kept open, the agencies should classify the roads based on whether they are needed for long-term access or temporary uses. Roads with only temporary uses can then be targeted for closure or restricted use. Roads needed for long-term access can be further assessed as to their specific needs (servicing an important public destination or only needed for limited activities), and a complementary maintenance program and other limitations on use implemented. Based on the proclamation, the agencies' primary obligation is to protect Monument objects, including through prohibiting off-road use of vehicles. Therefore, the agencies must justify their decision to keep roads open based on a necessary destination or use, in conjunction with the agencies' assessment that keeping the road open will not pose an avoidable risk of damage to Monument objects. 4. Travel management decisions should be based on a scientific assessment of road densities and effects: Certain decisions to sanction, build, or maintain roads can impose detrimental and long-lasting effects on the landscape. Roads and other transportation features have numerous effects on wildlife, including mortality from collisions, modification of animal behavior, disruption of the physical environment, alteration of the chemical environment, spread of exotic species, and changes in human use of the lands and water (Trombulak and Frissell 2000). Specific examples include habitat loss and fragmentation; diminished animal use of habitats because of noise, dust emissions, and the presence of humans; loss of forage for herbivores; interference with wildlife life-history functions (for example, courtship, nesting, and migration); spread of non-native species carried by vehicles and along disturbed corridors created by road establishment and maintenance; increased poaching or unethical hunting practices; increased recreation by off-road vehicles and associated impacts; and degradation of aquatic habitats. Road access also increases vandalism, theft, and damage to archeological and cultural sites. management plan and should become a term and condition upon which the allotment is evaluated for compliance with the BLM's Rangeland Health Standards and Guidelines as developed through the RACs. Once critical and agreed upon access roads and trails are identified and a transportation network	

Topic: Travel and Access

Letter No./ Comment No.	Comment	Response
	established through the planning process, the NPS and BLM should develop a travel map. This map should identify roads available for motorized vehicles and trails available for non-motorized uses. The map and additional visitor information should make it clear that off-road motorized use is prohibited to protect the resources in the Monument. This information should be readily available on user maps, kiosks or signs, and on the BLM and NPS web sites. The transportation plan, as part of the resource management plan, must mandate road closures when necessary to prevent the spread of invasive plant species and to protect cultural and geological resources and natural resources and wildlife habitats. Road closures may also be necessary at certain times to protect vegetation from fire caused by vehicles (e.g., catalytic converters). Overall, road, way and trail management should strive to eliminate unnecessary and little used routes. Any road improvements or developments should be analyzed for their potential significant impacts to the resources of the Monument. New roads should not be built and existing roads should not be significantly improved. Road maintenance should be minimal and conducted only when necessary for specific access or safety, but in no case should roads be upgraded or widened without proper analysis of potential environmental consequences. This is consistent with current BLM Interim Management Policy for National Monuments and NCAs, "Road improvements should be minimal and designed solely to correct those conditions that are unsafe or hazardous. Activities that maintain, as opposed to enhance, existing roads may be permissible." (DEIS p. 293) 3. Road classifications should be based on use of roads and not solely on manner of construction: Once the agencies identify roads (using the legal definition of roads), they should classify the roads by use. The classifications included in the current DEIS are based on the way that roads are constructed and, to some extent, maintained. In determining those roads that should be kept open, the agencies should classify the roads based on whether they are needed for long-term access or temporary uses. Roads with only temporary uses can then be targeted for closure or restricted use. Roads needed for long-term access can be further assessed as to their specific needs (servicing an important public destination or only needed for limited activities), and a complementary maintenance program and other limitations on use implemented. Based on the proclamation, the agencies' primary obligation is to	

Letter No./ Comment No.	Comment	Response
	protect Monument objects, including through prohibiting off-road use of vehicles. Therefore, the agencies must justify their decision to keep roads open based on a necessary destination or use, in conjunction with the agencies' assessment that keeping the road open will not pose an avoidable risk of damage to Monument objects. 4. Travel management decisions should be based on a scientific assessment of road densities and effects: Certain decisions to sanction, build, or maintain roads can impose detrimental and long-lasting effects on the landscape. Roads and other transportation features have numerous effects on wildlife, including mortality from collisions, modification of animal behavior, disruption of the physical environment, alteration of the chemical environment, spread of exotic species, and changes in human use of the lands and water (Trombulak and Frissell 2000). Specific examples include habitat loss and fragmentation; diminished animal use of habitats because of noise, dust emissions, and the presence of humans; loss of forage for herbivores; interference with wildlife life-history functions (for example, courtship, nesting, and migration); spread of non-native species carried by vehicles and along disturbed corridors created by road establishment and maintenance; increased poaching or unethical hunting practices; increased recreation by off-road vehicles and associated impacts; and degradation of aquatic habitats. Road access also increases vandalism, theft, and damage to archeological and cultural sites. impact of a proposed action, taking a "hard look" at environmental consequences,1 and the scope of the analysis "must be appropriate to the action in question." Spatial analysis is the appropriate way to take this "hard look" at the impacts of routes on the Monument objects and the agencies should apply these techniques in order to meet the requirements of NEPA. In addition to NEPA's "hard look," the Federal Land Policy and Management Act (FLPMA) requires that, in managing the public lands, the BLM "take any action necessary to prevent unnecessary or undue degradation of the lands."2 FLPMA also requires that the BLM "minimize adverse impacts on the natural, environmental, scientific, cultural, and other resources and values (including fish and wildlife habitat) of the public lands involved." 3 Further, when conducting land use planning, agencies must give priority to designating and protecting ACECs and consider physical, biological, economic and other sciences.4 The agencies	

Topic: Travel and Access

Letter No./ Comment No.	Comment	Response
	cannot evaluate consequences to the environment, determine avoidable or excessive degradation or assess how best to designate and protect ACECs without adequate data and analysis. Therefore, NEPA also requires that the "hard look" at environmental consequences be based on "accurate scientific information" of "high quality."5 Essentially, NEPA "ensures that the agency, in reaching its decision, will have available and will carefully consider, detailed information concerning significant environmental impacts."6 We recommend that the agencies use information from a thorough inventory of the Monument and the spatial analysis techniques summarized above to carefully evaluate the impacts of alternative transportation systems on Monument objects. 5. Firm schedule for closures: Where the agencies identify roads and trails for closure or imposition of other restrictions on time and manner of use, the plan should include a firm schedule for completing closures and imposing other restrictions. 6. Overview of travel management planning process: We recommend that the agencies conduct travel management planning in accordance with the following steps: We recommend a process that includes the following steps: (1) Classify existing routes according to previous designations, destination, access to valid and existing rights, and route conditions (and specify whether the route meets the legal definitions of a road cited above). (2) Identify the presence and assess the condition of Monument objects and other on-the-ground resources, for example wildlife, soil types, slope, geologic features, roadless areas, and archeological or historic sites. (3) Assess present and predicted future fiscal and personnel resources.(4) Summarize public recreation desires and current recreational opportunities. (5) Assess route density and distribution in comparison to on-the-ground resources assessed in Step 2. (6) Identify the overall recreational and travel goals for the entire area, based on the proclamation. (7) Identify geographic subunits and, for each subunit, develop desired future conditions and indicators and standards needed to achieve the desired future conditions. [Please note that this is the step where the range of alternatives is created.] (8) Assess and designate routes at the site-level, considering each route's classification, reasonable access to valid and existing rights, goals and objectives, agency management capability, and impacts to high priority resources. Except for routes subject to valid existing rights or necessary for	

Letter No./ Comment No.	Comment	Response
	administrative or emergency access, routes that do not meet the legal definition of a road should be closed. (9) Review route assessment at the landscape level, considering goals and objectives, landscape health, agency management capacity, and protection and high priority biological, physical and cultural resources. (10) Develop and implement a monitoring plan, including hiring sufficient enforcement personnel to protect the Monument and specifying required changes to management to implement further protections where desired future conditions are not being met. Using this approach, route designation (Step 8) is conducted in the appropriate context to allow assessment of the multiple uses and values of an area, development of a reasonable range of alternatives and thorough assessment of potential environmental consequences, while considering existing planning decisions and management capability. As a general approach to route designation within the Monument, we would propose the following general methodology: (1) Site-level road/route assessment. If any of the answers are "no," the route should be closed. a. Is the route a Class A road, Class B road or constructed Class C road? [Essentially, does the route meet the legal definition of a "road" discussed above?] b. If so, does the road have a destination? c. If so, does it contribute to the goals and objectives of the subunit? d. If so, is it consistent with the purposes of the Monument (e.g., avoid impacts to Monument objects)? e. If so, are the agencies reasonably capable of managing visitors on and near the road? f. If so, does the road avoid impacts to other high priority resources identified? g. If so, keep the road. If not, consider options to ensure that other high priority resources are protected. Options include rerouting, seasonal closure, permanent closure, enhanced ranger presence and/or education. (2) Supplemental road/route assessment for roads classified as reasonable access to valid and existing rights, or as necessary for "emergency or authorized administrative purposes": a. Is the route the only reasonable access to valid and existing rights, or is it critical for "emergency or authorized administrative purposes"? b. If no, and if the route would be closed or subject to limitations under Step (1), then close the route. If yes, were any of the answers in Step (1) "no"? c. If no, keep the route open. If yes, then limit access to administrative or authorized purposes only, and consider seasonal closures or rerouting to protect high priority resources.	

Topic Travel and Access

Letter No./ Comment No.	Comment	Response
116 / 006	There must be a comprehensive road inventory that is conducted with a management goal of maximizing the miles of roads designated for closure and restoration to natural conditions.	See Chapter One, Future Planning Needs, Transportation Planning. In the proposed Management Plan we describe desired future conditions and management actions for the type of roads and access that is appropriate within each of four management zones. The plan also classifies and inventories the type of roads and trails currently in existence within the Monument. Specific decisions on Access and Transportation beyond those already defined in the management zone descriptions will be made in the upcoming implementation level Comprehensive Travel Management Plan. This implementation plan will include a detailed map including all designations for access and travel within the Monument, including road travel restrictions and road closures to meet resource management objectives, such as protection of special status species habitat, defined in the Proposed Plan. There will be no net increase in road mileage under this plan.
125 / 006	BRC has received information from members living in surrounding communities about specific roads on the south end of the Wapi flow and in the Great Rift WSA. These roads provide a very valuable recreational experience. We strongly urge the BLM to work with our members to identify the specific roads and trails that appropriate to remain open, and designate them are open either in the Final Management Plan or in subsequent travel planning.	See Chapter One, Future Planning Needs, Transportation Planning. In the proposed Management Plan we describe desired future conditions and management actions for the type of roads and access that is appropriate within each of four management zones. The plan also classifies and inventories the type of roads and trails currently in existence within the Monument. Specific decisions on Access and Transportation beyond those already defined in the management zone descriptions will be made in the upcoming implementation level Comprehensive Travel Management Plan. This implementation plan will include a detailed map including all designations for Travel and Access within the Monument, including road travel restrictions and road closures to meet resource management objectives, such as protection of special status species habitat, defined in the Proposed Plan/FEIS. There will be no net increase in road mileage under this plan. Thank you for your comments. We look forward to working with you and other interested groups and individuals when we craft the Transportation Plan that will build on the provisions in this land use plan.
105 / 006	Since the agencies are not including a travel plan as partof this RMP, then the agencies should make a threat of noxious weeds, wildlife disturbances, and impacts to the natural setting and solitude.	See Chapter One, Future Planning Needs, Transportation Planning. In the proposed Management Plan we describe desired future conditions and management actions for the type of roads and access that is appropriate within each of four management zones. The plan also classifies and inventories the type of roads and trails currently in existence within the Monument. Specific decisions on Access and Transportation beyond those already defined in the management

Topic Travel and Access

Letter No./ Comment No.	Comment	Response
		zone descriptions will be made in the upcoming implementation level Comprehensive Travel Management Plan. This implementation plan will include a detailed map including all designations for access and travel within the Monument, including road travel restrictions and road closures to meet resource management objectives, such as protection of special status species habitat, defined in the Proposed Plan. There will be no net increase in road mileage under this plan.
103 / 007	Signage, development, road maintenance, and motorizedtravel should be kept to a minimum throughout the Monument and preserve. The general public should be encouraged and directed to the "old," developed portion of the Monument for most visitor experiences. Use and visitation to the lands recently added to the Monument and Preserve should be for those people seeking solitude and a remote and primitive wilderness experience, and "at your own risk." front country zones. Road inventory should be comprehensive with a management goal of road closure and rehabilitation.	See Chapter One, Future Planning Needs, Transportation Planning. In the proposed Management Plan we describe desired future conditions and management actions for the type of roads and access that is appropriate within each of four management zones. The plan also classifies and inventories the type of roads and trails currently in existence within the Monument. Specific decisions on Access and Transportation beyond those already defined in the management zone descriptions will be made in the upcoming implementation level Comprehensive Travel Management Plan. This implementation plan will include a detailed map including all designations for access and travel within the Monument, including road travel restrictions and road closures to meet resource management objectives, such as protection of special status species habitat, defined in the Proposed Plan. There will be no net increase in road mileage under this plan.
121 / 007	…order to protect the natural and cultural objects identified in the proclamation, the designation of roads and trails and travel restrictions must be dine as part of the current planning process. The transportation plan should be completed during this planning process and integrated into the comprehensive management plan, not deferred to a later date. The transportation plan should not only close roads and impose travel restrictions, as appropriate, immediately upon completion of the plan, but also outline the conditions that will trigger future road closures and travel restrictions.	See Chapter One, Future Planning Needs, Transportation Planning. In the proposed Management Plan we describe desired future conditions and management actions for the type of roads and access that is appropriate within each of four management zones. The plan also classifies and inventories the type of roads and trails currently in existence within the Monument. Specific decisions on Access and Transportation beyond those already defined in the management zone descriptions will be made in the upcoming implementation level Comprehensive Travel Management Plan. This implementation plan will include a detailed map including all designations for access and travel within the Monument, including road travel restrictions and road closures to meet resource management objectives, such as protection of special status species habitat, defined in the Proposed Plan. There will be no net increase in road mileage under this plan.
122 / 008	We urge NPS/BLM to allow use of the historic sheep trailing route from Paddelford Flat to Highway 20. This trail is of significant historical and cultural value and its use should be preserved. The	Future sheep trail use on NPS lands requires further analysis. Ultimately, the status of the historic sheep trail will be an implementation-level decision. See Appendix F of the Proposed Plan/FEIS.

Topic Travel and Access

Letter No./ Comment No.	Comment	Response
	periodic use of this trailing route would have no significant environmental impact and would provide a much safer and efficient route to our home base at Lava Lake Ranch.	
121 / 008	The transportation plan should seek to use only existing roads and should analyze the current condition of these roads. A very important part of the transportation plan is the definitions of what legally constitutes a road. The legal definition of a road is derived from the definition of "roadless" in the legislative history of FLPMA: "The word "roadless" refers to the absence of roads which have been improved and maintained by mechanical means to insure relatively regular and continuous use. A way maintained solely by the passage of vehicles does not constitute a road." An accurate and precise definition of a road is necessary to meet the obligations articulate by the proclamation, especially in the context of the prohibition against motorized and mechanized vehicle use "off-road."	See Chapter 3 (DEIS Pg. 112) Land Use and Transportation/Travel and Access. In response to public comment concerning a lack of clarity in the Draft Management Plan / Environmental Impact Statement, road and trail definitions have been refined (See Chapter 3, Land Use and Transportation/Travel and Access, Road and Trail Definitions). These definitions apply to a road and trail inventory based on best available data at the time of this draft which includes 1:24000 USGS topographic maps, BLM 1:100,000 topographic maps and a 2002 survey of roads, ways and trails in and around existing wilderness study areas.
104 / 009	…restrictions and high standards to prevent the spread of seeds. The most effective way to deal with this problem would be to implement an alternative that emphasized Pristine Zone designations. In the event that roaded access is imperative for restoration efforts, the BLM and NPS should limit access to administrative use only through a series of gates and closures and maintain these roads in their current condition.	Analysis in the DEIS (Ch. 4) acknowledges the risk of increased road improvement relative to weed infestation, fire risk, wilderness values and geologic features. In response to comments such as this the ID team reduced the amount of Passage Zone in the Proposed Plan/FEIS, particularly in Laidlaw Park. The implementation plan for transportation will address road maintenance and improvement within specific areas and zones of the Monument, with consideration to these and other issues. See Chapter One, Future Planning Needs, Transportation Planning. In the proposed Management Plan we describe desired future conditions and management actions for the type of roads and access that is appropriate within each of four management zones. The plan also classifies and inventories the type of roads and trails currently in existence within the Monument. Specific decisions on Access and Transportation beyond those already defined in the management zone descriptions will be made in the upcoming implementation level Comprehensive Travel Management Plan. This implementation plan will include a detailed map including all designations for Travel and Access within the Monument, including road travel restrictions and road closures to meet resource management objectives, such as protection of special status species habitat, defined in the Proposed Plan/FEIS. There will be no net increase in road mileage under this plan.

Topic Travel and Access

Letter No./ Comment No.	Comment	Response
70 / 012	There seems to be a presumption that there will be no increased use of roads in spite of the fact the roads will be improved to enhanced delivery of administrative (weed controVrestoration) and fire services.	The existing roads support a variety of administrative activities, such as weed control and fire fighting, and have since before the new Monument was designated. These administrative uses may increase for short periods of time, such as during restoration activity, but the long-term impacts of that administrative use is expected to increase only slightly.
165 / 012	Page 50 -Alternative D; Travel and Access; ManagementActions: bullets 1,3, and 5: These actions will facilitate habitat degradation, fire frequency, noxious weed infestation, vandalism and theft of cultural and geological resources by allowing better and more frequent motorized access to these areas. Proclamation 7373 specifically sets aside these lands "for the purpose of protecting the objects identified above (lava flows, kipukas, natural landscapes)." The Service believes that access should not take precedence over the integrity and health of lands identified in the proclamation. We suggest that Class C and D roads and temporary roads could accommodate the management activities proposed in all alternatives.	See Chapter One, Future Planning Needs, Transportation Planning. In the proposed Management Plan we describe desired future conditions and management actions for the type of roads and access that is appropriate within each of four management zones. The plan also classifies and inventories the type of roads and trails currently in existence within the Monument. Specific decisions on Access and Transportation beyond those already defined in the management zone descriptions will be made in the upcoming implementation level Comprehensive Travel Management Plan. This implementation plan will include a detailed map including all designations for access and travel within the Monument, including road travel restrictions and road closures to meet resource management objectives, such as protection of special status species habitat, defined in the Proposed Plan. There will be no net increase in road mileage under this plan.
121 / 013	Laidlaw Park has several hundred miles of existing roads, ways, two tracks, and other routes. One of the best ways to protect the biological diversity of northern Laidlaw Park would be to rehabilitate and close many of these routes. The reduction of open routes in this area will also reduce the risk of human-caused fires. We support and encourage the efforts of the BLM and livestock permittees to reduce the use of motorized equipment to support grazing, thus reducing the miles of roads and trails in use, especially in the Laidlaw Park area.	See Chapter One, Future Planning Needs, Transportation Planning. In the proposed Management Plan we describe desired future conditions and management actions for the type of roads and access that is appropriate within each of four management zones. The plan also classifies and inventories the type of roads and trails currently in existence within the Monument. Specific decisions on Access and Transportation beyond those already defined in the management zone descriptions will be made in the upcoming implementation level Comprehensive Travel Management Plan. This implementation plan will include a detailed map including all designations for access and travel within the Monument, including road travel restrictions and road closures to meet resource management objectives, such as protection of special status species habitat, defined in the Proposed Plan. There will be no net increase in road mileage under this plan.
165 / 020	Page 70- Land use and Transportation: Travel and Access: Alternative C identifies “minor adverse Impacts on travel from visitors using lower standard roads”. Alternative D carries this same potential yet it is not identified there.	See the revised Travel and Access section of Chapter 4, Environmental Consequences, in the Proposed Plan/FEIS.

Topic Travel and Access

Letter No./ Comment No.	Comment	Response
123 / 020	The relationship between transportation and access and past, ongoing and proposed livestock grazing is not described. DEIS at 13-14 addresses livestock grazing under “Authorized Uses”.	The Livestock grazing section on page 121 describes some of the relationships associated with grazing and existing roads.
165 / 025	Page 167-Affected Environment; Impacts from Alternative C: It is stated that a decrease in access would occur under this alternative. We do not believe that this is entirely accurate. There would be a decrease in motorized access, but access from foot or pack animal would remain the same. Legal access to a given area is not being altered, only the means by which an area can be accessed.	Yes, there would be a decrease in motorized and mechanized access under Alternative C, which may have a slight impact on the level of foot traffic in areas further from established roads. The amount of pack animal access would probably remain the same.
123 / 042	In the description of “Passage Zones”, the DEIS should describe the link between road upgrades and livestock facilities. When a Supplemental DEIS is undertaken to examine the impacts of livestock projects and associated roading, evaluation of road closures should be part of this process, and thus revision of the Passage Zone area under a new range of alternatives.	See Chapter 2, Alternative D Description and Map. In the Proposed Alternative, Passage Zone was significantly reduced in response to public comment and after additional consideration of the potential impacts to resources. Creating Passage Zone corridors does not mandate an increase in the number or current standard of roads (See chapter 2, Description of Management Zones). In addition, see chapter 4 Environmental Consequences on page 205-209 of the DEIS for impacts of road upgrades and livestock facilities.
123 / 043	There has been no rationale provided for including all of the many roads shown on the map of Alt. D as “passage” roads. This is a dramatic increase in Upgraded roads from Alt, A, the current situation. There is no recreational justification for the large network of roads and upgraded roads in Laidlaw Park. There has been no study undertaken or information that shows that these roads are necessary for livestock purposes, either. Designation of a “Passage” Zone here will doom these areas to even more livestock project and other developments. In fact, structuring alternatives in this plan in this way can be interpreted as a move to facilitate and expand livestock use and all its weed-spreading and habitat fragmenting effects in the heart of the World’s largest kipuka. The definition of “Passage Zone” must be changed to prohibit new livestock facilities or expanded water hauling.	See Chapter 2, Alternative D Description and Map. In the Proposed Alternative, Passage Zone was significantly reduced in response to public comment and after additional consideration of the potential impacts to resources. Creating Passage Zone corridors does not mandate an increase in the number or current standard of roads (See chapter 2, Description of Management Zones. In addition, the desired future condition on page 29 of the DEIS states "Livestock developments are consistent with the desired future condition for natural, cultural and visual resources."

Topic Travel and Access

Letter No./ Comment No.	Comment	Response
123 / 044	The roads of Alt. D directly conflict with many of the DEIS DFCs, such as "continuity of habitat for special status species and general wildlife will be emphasized" –as roads serve as conduits for weed spread that will thwart any "restoration" projects, lead to increased fires and fragmentation, etc.	See Chapter One, Future Planning Needs, Transportation Planning. In the proposed Management Plan we describe desired future conditions and management actions for the type of roads and access that is appropriate within each of four management zones. The plan also classifies and inventories the type of roads and trails currently in existence within the Monument. Specific decisions on Access and Transportation beyond those already defined in the management zone descriptions will be made in the upcoming implementation level Comprehensive Travel Management Plan. This implementation plan will include a detailed map including all designations for access and travel within the Monument, including road travel restrictions and road closures to meet resource management objectives, such as protection of special status species habitat, defined in the Proposed Plan. There will be no net increase in road mileage under this plan.
123 / 045	The present situation –where many of the roads are not "front country" allows fire response time just fine – as vehicles can readily traverse jeep trails. If fire access is needed, the plan should provide for use of the road corridors on an "emergency only" basis.	Zoning does not guarantee that roads would be improved -- it simply provides for guidance and flexibility based on resource values and management needs. Thank you for your comment. It will be considered in the crafting of the travel implementation plan.
123 / 047	The network of "passage" areas and roads and likely new livestock developments under Alt. D conflicts with Map Figure 7 VRM classifications. Please explain how livestock facilities are compatible with "Class 2" VRM categories.	Refer to page 137 for detailed VRM classifications. All livestock facilities in the Passage Zone will be subject to Class Two VRM restrictions.
123 / 049	DEIS at 51, Table 5 shows that Alt. D would allow 287 miles of Class C roads in "primitive" areas, and 158 miles of Class D roads in "primitive" areas. This is a wildly excessive number, and is simply not needed for fire suppression or any other purposes. Agency fire people have aerial abilities to suppress fire. You vastly increase the risk of human-caused fire by having so many roads to entice driving by visitors who are often little aware of the dangers of driving over cheatgrass, tumblemustards and other dried vegetation in the center of two tracks, or growing on road and trail margins. Keeping this many miles of roads open while upgrading many access roads will ensure the maximum number of human-caused fires are started, and will greatly increase fire danger here. Plus, the more roads that are open to be driven, the greater likelihood that the public will become confused and disoriented, and lost far from water. Each road will serve as a jumping-off point for OHV intrusions into unroaded lands. Also, by leaving	In response to this comment and many others expressing either support for increasing or decreasing the amount of area included in the Passage Zone, as well as additional consideration of the environmental consequences, the agencies modified the areas contained in the Passage Zone in Alternative D as presented herein as the Proposed Plan. Analysis in the DEIS (Ch. 4) acknowledges the risk of increased road improvement relative to weed infestation, fire risk, wilderness values and geologic features. In response to comments such as this the ID team reduced the amount of Passage Zone in the Proposed Plan/FEIS, particularly in Laidlaw Park. The implementation plan for transportation will address road maintenance and improvement within specific areas and zones of the Monument, with consideration to these and other issues. See Chapter One, Future Planning Needs, Transportation Planning. In the proposed Management Plan we describe desired future conditions and management actions for the type of roads and access that is

Topic Travel and Access

Letter No./ Comment No.	Comment	Response
	this many roads open, you essentially condemn the lands of the "primitive" zone to become an OHV enforcement nightmare. These roads, and their location, have absolutely nothing to do with a strategic placement for fire access/suppression. The only reason many of these roads exist is because of livestock projects and permittee driving to place salt, park sheep wagons, etc. The road network (much of it unnecessary) simply grew in association with livestock activities and was not regulated by BLM.	appropriate within each of four management zones. The plan also classifies and inventories the type of roads and trails currently in existence within the Monument. Specific decisions on Access and Transportation beyond those already defined in the management zone descriptions will be made in the upcoming implementation level Comprehensive Travel Management Plan. This implementation plan will include a detailed map including all designations for access and travel within the Monument, including road travel restrictions and road closures to meet resource management objectives, such as protection of special status species habitat, defined in the Proposed Plan/FEIS. There will be no net increase in road mileage under this plan.
123 / 056	DEIS at 53 wrongly claims that "air quality" will remain the same under all alternatives. That is not the case – more roads = more dusty, bare erosion surfaces to produce wind-borne dust. Depending on just how many and what type of chemicals BLM plans on using in its treatments, Alt. D may add significant chemical pollutants in the air and roadside dust, may infiltrating waters flowing into seasonal playas, etc.	The section referenced indicated that for the purposes of selecting a preferred alternative, air quality was not a factor in the "Choosing by Advantages" process. The DEIS did not state that air quality would remain the same under all alternatives. The DEIS stated the differences in air quality impacts between the four alternatives were not "substantial" enough to include air quality as a factor in the CBA process. The air resource section of Chapter 4 of the DEIS discusses the differences in air quality impacts of the four alternatives. Both fugitive dust from vehicle traffic on roads and smoke from prescribed fires were predicted to be higher under Alternative D.
123 / 073	By keeping all existing minor roads and two tracks open, Alt. D maximizes chances for ill-prepared visitors to become disoriented and lost; to set fires by parking catalytic converters on top of cheatgrass, etc. The status quo livestock grazing, high road densities in sagebrush and cheatgrass and weed infested lands; and use of herbicide must be considered here. Plus, the chance of prescribed fire escaping from "treatments" Must be assessed. Improving more roads will result in higher speeds on loose gravel Thus, it decreases public safety and health.	See Chapter One, Future Planning Needs, Transportation Planning. In the proposed Management Plan we describe desired future conditions and management actions for the type of roads and access that is appropriate within each of four management zones. The plan also classifies and inventories the type of roads and trails currently in existence within the Monument. Specific decisions on Access and Transportation beyond those already defined in the management zone descriptions will be made in the upcoming implementation level Comprehensive Travel Management Plan. This implementation plan will include a detailed map including all designations for access and travel within the Monument, including road travel restrictions and road closures to meet resource management objectives, such as protection of special status species habitat, defined in the Proposed Plan. There will be no net increase in road mileage under this plan.
123 / 091	How might the intensive restoration, many roads, upgraded gravel roads and livestock grazing here contribute to fugitive dust?	These impacts to air resources were addressed in the DEIS on pages 182-186.
123 / 093	DEIS at 115-116. There seems to be some discrepancy between the description of the Class C road, and the photo. If Class C roads have an "unimproved, natural surface", why do you claim that maintenance costs are $200-$400/mile. Class C roads aren't improved – are they?	A class C road is defined as a road that has been constructed or established over time by repeated use. The definition goes on to say "a minimal amount of maintenance is limited primarily to surface grading to allow vehicle passage within the original road corridor. See Travel and Access, Chapter 3, Proposed Plan/FEIS.

Topic Travel and Access

Letter No./ Comment No.	Comment	Response
123 / 108	DEIS at 128 describes the number of miles of vehicle ways in the WSA at the time of inventory. However, many more miles may now exist due to unauthorized activity, fire suppression, etc. How many more miles now exist, and where are they located? Please present a map for comparative purposes. As part of the DEIS, closure and restoration of all unauthorized ways, fire equipment scars, etc. must be undertaken.	The WSA inventory data is the most recent data available on ways within WSAs.
123 / 141	The impacts analysis for roads for other Alternatives is NOT the same as Alternative A. The DEIS plans to improve more roads, thus facilitating access to remote areas, especially near the lava edges, and increasing potential for vandalism of cultural and other sites associated with these margins.	Not all alternatives considered in the draft DEIS involve the upgrading of roads and, consequently, improving access to remote areas. The impacts of improved access to cultural resources have been analyzed on pages 89-90 of the draft DEIS. The impacts of reduced access to cultural resources have been analyzed on pages 191-192 pf the draft EIS.
123 / 144	From review of the maps, it does not really appear that therewill be many more road developments under Alt. B than D. The DEIS provides no rationale for identifying the various roads to be Upgraded under the various alternatives. The DEIS has failed to reveal the areas where restoration is planned, or which roads are deemed necessary for fire activities. As this is the basis of this alternative, you must clearly identify and provide maps of all of this. Analysis of Alt. D and roads is flawed, as grazing would potentially increase dramatically, since upgrading roads allows new livestock projects since the area then becomes classified as "passage" zone. DEIS Map of Alt. D roads shows upgraded roads along/near to large areas of lava, including right next to the Bear Den Butte WSA, compare Map Figure 9 (DEIS at 48), and Map Figure 18, (DEIS at 129). Yet, the DEIS fails to analyze these impacts on WSA values of solitude, naturalness, primitive recreation and special features.	See Chapter 2, Alternative D Description and Map. In the Proposed Alternative, Passage Zone was significantly reduced in response to public comment and after additional consideration of the potential impacts to resources. Creating Passage Zone corridors does not mandate an increase in the number or current standard of roads (See chapter 2, Description of Management Zones). See Chapter One, Future Planning Needs, Transportation Planning. In the proposed Management Plan we describe desired future conditions and management actions for the type of roads and access that is appropriate within each of four management zones. The plan also classifies and inventories the type of roads and trails currently in existence within the Monument. Specific decisions on Access and Transportation beyond those already defined in the management zone descriptions will be made in the upcoming implementation level Comprehensive Travel Management Plan. This implementation plan will include a detailed map including all designations for access and travel within the Monument, including road travel restrictions and road closures to meet resource management objectives, such as protection of special status species habitat, defined in the Proposed Plan. There will be no net increase in road mileage under this plan. In addition, we have included additional maps detailing priority rehab areas in the Proposed Plan/FEIS.
123 / 155	DEIS at 167 fails to assess the role of vehicles in transporting weed seeds. More roads = more surfaces with weeds. It does acknowledge that more fragmentation would occur, but does not consider the synergistic, linked and cumulative impacts of fragmentation by roads, expanded or existing livestock facilities, and aggressive vegetation. treatments.	The analysis for vegetation, including special status species and fire management, (DEIS pp. 162-171) acknowledges the potential for weed spread by vehicles, as well as road maintenance activities.

Topic Travel and Access

Letter No./ Comment No.	Comment	Response
123 / 167	DEIS at 177 admits that fragmentation from roads, trails, facilities, exists. Yet, under the Preferred Alternative, this fragmentation would be expanded as road upgrades and livestock projects expand.	See Chapter 2, Alternative D Description and Map. In the Proposed Alternative, Passage Zone was significantly reduced in response to public comment and after additional consideration of the potential impacts to resources. Creating Passage Zone corridors does not mandate an increase in the number or current standard of roads (See chapter 2, Description of Management Zones). See Chapter One, Future Planning Needs, Transportation Planning. In the proposed Management Plan we describe desired future conditions and management actions for the type of roads and access that is appropriate within each of four management zones. The plan also classifies and inventories the type of roads and trails currently in existence within the Monument. Specific decisions on Access and Transportation beyond those already defined in the management zone descriptions will be made in the upcoming implementation level Comprehensive Travel Management Plan. This implementation plan will include a detailed map including all designations for access and travel within the Monument, including road travel restrictions and road closures to meet resource management objectives, such as protection of special status species habitat, defined in the Proposed Plan. There will be no net increase in road mileage under this plan.
123 / 189	Minimize the introduction, establishment and spread of invasive species due to roads and OHVs by the following methods: Roads, vehicle route construction, use and maintenance must be addressed by: 1) Develop maps and databases of all systems; 2) Precede all road or route reconstruction, and any consideration of adding existing illegal or user-created roads and off-road vehicle routes to the transportation system, by NEPA analysis of their impact, including potential to facilitate the spread of invasive species into native ecosystems 3) Close or restrict non-essential, designated routes for motorized travel in areas at high risk for spread of invasive species; 4) Implement measures that reduce the likelihood of weed seed dispersal. 5) Consider restricting road grading activities in areas with high populations of invasive species; 6) Implement full area closures that prohibit all motorized travel on lands outside of designated NEPA analyzed transportation systems 7) Identify and designate for obliteration non-essential system and non-system roads and off-road vehicle routes that do not comply with native vegetation protection goals; 8) Reclaim obliterated roads to native vegetation.	See Chapter One, Future Planning Needs, Transportation Planning. In the proposed Management Plan we describe desired future conditions and management actions for the type of roads and access that is appropriate within each of four management zones. The plan also classifies and inventories the type of roads and trails currently in existence within the Monument. Specific decisions on Access and Transportation beyond those already defined in the management zone descriptions will be made in the upcoming implementation level Comprehensive Travel Management Plan. This implementation plan will include a detailed map including all designations for access and travel within the Monument, including road travel restrictions and road closures to meet resource management objectives, such as protection of special status species habitat, defined in the Proposed Plan. There will be no net increase in road mileage under this plan. Thank you for your comments. We will consider these points in the Travel Management and Integrated Weed Management implementation plans.

Topic Recreation

Letter No./ Comment No.	Comment	Response
2 / 001	…the BLM and NPS, can you explain to me what philosophy both parties have or foresee on Cave Management within the Monument?	As stated on page 13 of the DEIS, a Cave Management Plan would be developed pursuant to the Final EIS to meet the requirements of the Federal Cave Resources Protection Act.
41 / 001	I am writing to express my support for the concept of an upgraded and realigned road connecting the Idaho cities of Minidoka and Arco. I see this as an important step which would benefit the communities of Arco, Mackay, Minidoka, Rupert, Heyburn, Burley in the Cassia, Minidoka and Butte counties. An adequate road upgrade and realignment would provide for recreation, tourism, farm to market, desert access and viewing, INEEL access, fire suppression, hunting, search and rescue access and a very beneficial north south route.	Upgrading or maintaining the Arco-Minidoka Road to a higher standard is not a management recommendation in the Proposed Plan/FEIS, however the dashed Passage Zone within the Monument would allow for improvements should the responsible county governments decide to upgrade the Arco-Minidoka Road in the future. See DEIS heading of Chapter 2, Alternative D, Travel and Access.
125 / 004	The decision to be made regarding the level ofuse of motorized vehicles in the Monument is one of the most contentious issues in this planning process. Based on the very restrictive prescriptions on motorized vehicle use in most of the alternatives, I know the great majority of resident public land users in Idaho will feel a strong sense of outrage if any of those alternatives were selected. This would be unfortunate in light of the fact that the many assumptions made regarding these proposed restrictions are not supportable by adequate scientific information, use of available factual data, deductive reasoning, sound recreation management principles and holistic analysis. BLM should provide vehicle assisted public land visitors a full range of recreational opportunity. BLM should formulate a complete and accurate inventory of currently used travelways. BLM should realize that there is extensive opportunity for "Pristine" recreational pursuits already provided in current management and there is no need to provide additional "primitive" or "pristine" opportunity. Conversely, there is a need to provide more designated motorized trails.	See Chapter One, Future Planning Needs, Transportation Planning. In the proposed Management Plan we describe desired future conditions and management actions for the type of roads and access that is appropriate within each of four management zones. The plan also classifies and inventories the type of roads and trails currently in existence within the Monument. Specific decisions on Access and Transportation beyond those already defined in the management zone descriptions will be made in the upcoming implementation level Comprehensive Travel Management Plan. This implementation plan will include a detailed map including all designations for access and travel within the Monument, including road travel restrictions and road closures to meet resource management objectives, such as protection of special status species habitat, defined in the Proposed Plan. There will be no net increase in road mileage under this plan.

Topic Recreation

Letter No./ Comment No.	Comment	Response
125 / 005	This [growing OHV] popularity is evidenced by the factthat recreational enthusiasts are buying OHV's at the rate of 1,500 units per day nationwide, with nearly one-third of them doing so as first-time buyers."1 "[BLM's OHV] Strategy recognizes, as does policy outlined in BLM Manual 8340 (May 25, 1982), that off-road vehicle use is an 'acceptable use of public land wherever it is compatible with established resource management objectives.' As established by the Federal land Policy and Management Act of 1976 (FlPMA), the BLM is required to manage public lands on the basis of multiple use and sustained yield, while protecting natural values. ...Motorized OHV use is now firmly established as a major recreational activity on BLM-administered public lands".2 Unwisely, rather than work to accommodate the increased demand for OHV recreation, BLM has frequently reacted by restricting OHV opportunities. But more importantly, opportunities to manage OHV use by marking roads and trails, providing usable maps, identifying OHV trails and systems and entering into cooperative management agreements with OHV user groups have, by and large, been ignored by the BLM. BLM cannot legitimately address increasing legitimate OHV demand by refusing to accommodate such demand. BLM planning must provide for the dramatic increasing demand for OHV recreation opportunities and anticipate even more demand in future years. The Final Management Plan must prudently provide for increased OHV recreation opportunities to meet current and anticipated demand. The planning team should look to County and Local Governments as well as individuals and user groups for assistance in identifying opportunities for OHV recreation. The planning team should develop management alternatives that allow for proactive OHV management. The Final Management Plan should include specific provisions to mark. map and maintain existing OHV opportunities. The Final Plan shouldinclude instructions to engage in cooperative management with OHV Groups and individuals. The planning team should give serious consideration to provisions in the Final Management Plan that allow full implementation of the agencies OHV policy and even direct land managers to identify and develop OHV travel systems in appropriate areas.	See Chapter One, Future Planning Needs, Transportation Planning. In the proposed Management Plan we describe desired future conditions and management actions for the type of roads and access that is appropriate within each of four management zones. The plan also classifies and inventories the type of roads and trails currently in existence within the Monument. Specific decisions on Access and Transportation beyond those already defined in the management zone descriptions will be made in the upcoming implementation level Comprehensive Travel Management Plan. This implementation plan will include a detailed map including all designations for access and travel within the Monument, including road travel restrictions and road closures to meet resource management objectives, such as protection of special status species habitat, defined in the Proposed Plan. There will be no net increase in road mileage under this plan.

Topic Recreation

Letter No./ Comment No.	Comment	Response
121 / 009	The management plan should include a monitoringplan to ensure primitive camping and recreation does not damage resources. Steps that will be taken to relocate or close and rehabilitate areas with conflicts between visitors and resource protection should be identified.	On pages 12-13 of the DEIS, future planning needs are discussed. Many of the implementation plans describe, such as the Wilderness/Wilderness Study Area Plan, the Cave Management Plan, and the Cultural Resources Plan, would provide for periodic monitoring and protection of resources from adverse impacts, such as primitive camping and recreation.
104 / 017	The plan seems to imply that irresponsible OHV use is currently a problem and/or will be in the future by noting, “Most OHV activity takes place on the existing road network…” (P. 133). Information should be provided about OHV use that is occurring elsewhere besides the existing road network in order to provide an understanding of the scope of the problem as well as the potential for increased risk from greater user-access to various parts of the Monument. The FEIS should describe the illegal OHV use in the southern end of the Monument and ways to address this issue.	On page 148, under "Incomplete or Unavailable Information" the DEIS states "data about visitor use is available for the original Monument, but such information for the remaining area is limited."
104 / 018	The plan should provide more information comparing the potential impacts from OHV’s associated with each alternative. The DEIS notes that increased access from expansion of Passage Zone would increase the risk of illegal off-road use. As a preventative measure, administrative roads should be gates and closed to all other motorized use.	On page 148, under "Incomplete or Unavailable Information" the DEIS states "data about visitor use is available for the original Monument, but such information for the remaining area is limited." As stated on page 12 of the EIS, a Travel Management Plan would be developed pursuant to the Final EIS to address these issues.
123 / 039	DEIS at 31 describes two programs. Are these part of the Idaho Parks and Recreation. If so, we are concerned that these programs may have a strong bias towards motorized use, at the expense of other uses. Why are you not developing a plan tailored for Craters?	Idaho's State Comprehensive Outdoor Recreation and Tourism Plan and the Idaho Outdoor Recreation Demand Assessment are tools available to the agencies to provide information on recreation use patterns, trends and facilities that may be required. They do not set agency policy for federal lands.
123 / 041	Recreation (DEIS at 31) fails to describe the possible negative impacts on back country recreation of relying on extensive guide services, as proposed here. We have encountered lands in the Bennett Hills where guided therapy groups frequently take clients, and they are becoming beat out and heavily impacted by human use. Do you anticipate both guided recreation and therapy groups here? What upper cap or limit will you place on permits for commercial recreational or therapy on Craters lands? Who is operating here at present? What is the current number of guided trips per year, visitors using these services, etc.? What impacts are occurring?	There is currently one permitted guide service in the Monument, conducting less than three guided trips a year. The agencies do not foresee a dramatic increase in the number and types of guide services within the Monument. Additional information has been added to the Final EIS to clarify the potential impacts of outfitters and guides.

Topic Recreation

Letter No./ Comment No.	Comment	Response
123 / 075	The DEIS completely fails to address the intrusive impacts and degradation of Alt. D livestock and roads on visitors seeking a primitive or pristine recreation experience. Please explain how any aspect of livestock grazing would result in beneficial recreational impacts.	The impacts of livestock on visitor experience have been addressed on pages 222, 224, 226, and 228.
123 / 114	The DEIS claims that hiking in the expanded part of the Monument allows visitors to experience a high degree of solitude. Please assess how the upgraded roads (and likely new livestock facilities or water haul sites in the expanded "Passage Zones") will decrease solitude under the Preferred Alternative. How will all alternatives affect solitude? How do peak livestock grazing times correspond to peak visitor times? How do ranching activities (including guard dogs, noise, weeds, dust, stench, disease organisms) affect recreational visits?	Please see pages 222-229 of the DEIS for a discussion of impacts to visitor experience.
123 / 118	Since the DEIS does not describe otherwise, and hunting is allowed on all BLM lands, and ranchers are allowed to use aggressive guard dogs, we assume that dogs are also allowed to accompany visitors. What risks do WS activities pose for dogs accompanying recreationalists here?	NPS policy does not allow unrestrained dogs on Park Service lands. BLM has no policy regarding dogs. The risk to recreationists from dogs is relatively minor.
123 / 127	This EIS provides no guidance whatsoever on livestock grazing. You cannot assume that recreational use will be the same as in the past. Ever-more sophisticated OHV equipment, and especially snowmobiles, are louder, faster, etc. What about other new types of motorized equipment? Are motorized and crosscountry travel prohibited for ranching activities? As more four-wheelers are being used, the plan should expressly prohibit use of OHVs or any motorized equipment off exiting roads.	The agencies do not foresee a dramatic increase in recreational use under the Proposed Plan/FEIS. The Proclamation expressly prohibits motorized off-road travel within the Monument.

Topic Special Designation Areas

147 / 001	Designate North Laidlaw Park as an Area of Critical Environmental Concern.	The commenter did not provide any new information or studies that would update the analysis of relevance and importance criteria, resulting in a determination that ACEC status is warranted. Management direction to protect the high quality vegetation resources in North Laidlaw Park, similar to that proposed for the nominated ACEC, was included in Alternative D (See DEIS p. 49, Vegetation, Including Special Status Species, and Fire Management for Alternative D; and pp. 340, Appendix G). Analysis of the relevance and importance criteria for establishment of North Laidlaw Park as an ACEC did not indicate that ACEC status is required for protection of the area. To further protect the area, the preferred alternative was

Topic Special Designation Areas

Letter No./ Comment No.	Comment	Response
		modified to increase the acreage of Pristine Zone and decrease the acreage of Passage Zone in North Laidlaw Park. Management direction under Alternative D (p. 49) states that the high ecological condition of North Laidlaw Park would be maintained and no new water developments would be allowed.
130 / 002	The preferred alternative should include designation of North Laidlaw Park, one of the least disturbed, large areas of sagebrush	Same response as previous comment.
142 / 004	All Wilderness Study Areas should be managed under National Park Service guidelines and regulations. The preferred alternative should include designation of North Laidlaw Park, one of the least disturbed, large areas of sagebrush steppe, as an Area of Critical Environmental Concern.	Same response as previous comment.
165 / 008	The Service recommends that the preferred alternative include the designation of Laidlaw Park as an Area of Critical Environmental Concern (ACEC). ACECs include public lands where special management attention and direction is needed to protect and prevent irreparable damage to important historic, cultural, and scenic values, fish, or wildlife resources or other natural systems or processes; or to protect human life and safety from natural hazards. ACEC designation indicates that the management agency recognizes the significant values of the area and intends to implement management to protect and enhance the resource values. We understand that all ACEC's are considered land use authorization avoidance areas as they are known to contain resource values that will pose special constraints for and possibly denial of applications for land uses that can not be designed to be compatible with the management objectives and prescriptions for the ACEC. If the preferred alternative does include designation of Laidlaw Park as an ACEC, then the Service recommends the final document include management objectives and prescriptions to implement a resource management regime for Laidlaw Park's unique vegetative features.	Same response as previous comment.

Topic Special Designation Areas

Letter No./ Comment No.	Comment	Response
105 / 009	The EIS discusses the proposed designation of an ACEC for North Laidlaw Park. However, the conclusions reached regarding the need to designate the area as an ACEC or not should be reevaluated. While current management has left the area in good condition, it is hard to say what the next 15 to 20 years will bring. The area certainly qualifies for ACEC designation. But it is not safe to assume that current management, regulation, and law will remain the same and will stay in place for the life of this plan. Therefore, it is both necessary and wise to designate a place as special as Laidlaw Park as an ACEC. It is the best and only way to recognize and be certain that management actions will, in fact, protect the special resources and values for the future. The need to designate the area as an ACEC is also evident in the treatment of the issue in the planning process and planning documents. The section discussing the ACEC designation is relegated to an appendix in the back of the planning document. And, only one alternative looks at designating the area as an ACEC. It is not clear as to why alternatives B and/or D did not also look at ACEC designation. The fact that only 1 out of 4 alternatives even considers such designation and the associated actions shows a lack of understanding and commitment to take such actions if the ACEC were not designated. The designation of an ACEC and the related management actions for the area should be part of each alternative in the plan as a way to recognize and protect the high quality native vegetation, wildlife habitat and scenic values of this irreplaceable treasure. Laidlaw Park has a unique aspen stand, key habitat for sage grouse and other sagebrush steppe obligates and many other distinctions enumerated on pages 338 and 339 in the DEIS. It is the world's largest kipuka, has extraordinary scenic values and serves as a very important reference site for ecologically comparable, more heavily grazed sites. Additionally, the proclamation highlighted the importance of this area. The proposed actions should be changed to reflect a change to point c) "Water hauling to temporary sites will remain at the current level." This management direction should be revised. It is presumptive to conclude that grazing will continue in this area at current levels and for the life of the plan. It would be better to say "water hauling to temporary sites may remain at the current level or may be decreased, but it will not be increased." This provides more management flexibility. All alternatives, especially the agency-preferred alternative, should reflect designation of North Laidlaw Park as an ACEC and the management actions describes	Please refer to DEIS Appendix G, pp. 337-341. The ID team followed the appropriate process in analyzing the values in North Laidlaw Park to determine if the area qualified for ACEC status. The proposed ACEC was included and analyzed in Alternative C, the logical alternative to include the potential protection provided by the proposed ACEC. Further, to demonstrate a commitment to maintaining the high ecological condition of the area, protective measures were included in Alternative D, the preferred alternative, that limit livestock developments, specifically to maintain the light use that the area has received for years and that has resulted in the current condition (DEIS p. 49). Additional protective measures have been included in the Proposed Plan/FEIS, including decreasing the acreage of Passage Zone and increasing the acreage of Pristine Zone in Laidlaw Park. By comparing the effects of managing the area as an ACEC in Alternative C with the effects of managing the area with the protective measures in Alternative D we found no advantage in designating the area an ACEC and that we can achieve the same results with the protective measures in Alternative D. Therefore we concluded that it is unnecessary to designate the area as an ACEC.

Letter No./ Comment No.	Comment	Response
	under alternative C in the DEIS should be a part of those alternative with the changes as suggested above. There is no reason to exclude the area from the protection it deserves and needs.	
128 / 010	Please create ACECs for Cinder Gardens on Ant Butte and for key spring- and rare- systems in the Monument.	Blaine County has a free use permit at Ant Butte and has periodically mined cinder from the butte. Therefore, Ant butte does not appear to meet the relevance and criteria for an ACEC as described in Appendix G. Most of the cinder cones within the Monument lie within the Pristine Management Zone in all Alternatives, which serves to provide protection to the cones and attendant cinder gardens through limited access.
104 / 019	…standards. In all alternatives, North Laidlaw Park shouldbe designated as an Area of Critical Environmental Concern to ensure protection of the sagebrush steppe habitat. This would be far more effective than simply instituting restoration plans to mitigate impacts from the past and those that will occur in the future. The FEIS could vary the size of this ACEC in each alternative, but significant portions should be included in each alternative to protect the values at risk.	The commenter did not provide any new information or studies that would update the analysis of relevance and importance criteria, resulting in a determination that ACEC status is warranted. Management direction to protect the high quality vegetation resources in North Laidlaw Park, similar to that proposed for the nominated ACEC, was included in Alternative D (See DEIS p. 49, Vegetation, Including Special Status Species, and Fire Management for Alternative D; and pp. 340, Appendix G). Analysis of the relevance and importance criteria for establishment of North Laidlaw Park as an ACEC did not indicate that ACEC status is required for protection of the area. To further protect the area, the preferred alternative was modified to increase the acreage of Pristine Zone and decrease the acreage of Passage Zone in North Laidlaw Park. Management direction under Alternative D (p. 49) states that the high ecological condition of North Laidlaw Park would be maintained and no new livestock water developments would be allowed.

Topic Wilderness Study Areas

Letter No./ Comment No.	Comment	Response
103 / 002	This leads to a major complaint I have, which is the absolute lack of consideration of the wilderness quality lands included in the expanded boundaries. The current Craters of the Moon Wilderness Area must be substantially expanded beyond the current core area. Please revise the Plan with concrete steps to analyze, inventory, and to recommend to Congress ALL qualifying wilderness-quality lands in the Monument and Preserve. Complementary to this, the Plan must outline the requirement that all wilderness quality lands are managed consistent with their being designated as such by Congress in the future. The management must not allow any degradation of these areas to occur.	Both agencies inventoried all lands within the current Monument boundaries to determine areas with wilderness qualities. These inventories began in the 1960s and continued through the 1980s. These studies resulted in designation of the 43,243 acre Craters of the Moon Wilderness in 1970 and 469,009 acres of Wilderness Study Areas of which 408,110 acres have been recommended to the U.S. Congress for designation. Existing law and agency policy require management of Wilderness Study Areas to protect the wilderness qualities until Congress determines whether or not to designate the lands as wilderness.
12 / 002	All Wilderness Study Areas should be managed under National Park Service guidelines and regulations.	NPS and BLM are required follow their individual agency management policies including the management of WSA. Changes to those policies are beyond the scope of this plan.
116 / 003	Make certain that the Plan will manage all Wilderness Study Areas under the more protective NPS guidelines and regulations. The preferred alternative should include designation of North Laidlaw Park, one of the least disturbed, large areas of sagebrush steppe, as an Area of Critical Environmental Concern.	NPS and BLM are required follow their individual agency management policies including the management of WSA. Changes to those policies are beyond the scope of this plan.
18 / 003	Wilderness and ACEE: We urge that the wilderness study areas be managed under NPS policies and regulations, rather than the weaker BLM interim management policy.	NPS and BLM are required follow their individual agency management policies including the management of WSA. Changes to those policies are beyond the scope of this plan.
21 / 003	Wildlands Management- All Wilderness Study Areas should be managed consistent with the NPS's WSA standards. Designate North Laidlaw Park as an Area of Critical Environmental Concern, to ensure protection of sagebrush steppe habitat.	NPS and BLM are required follow their individual agency management policies including the management of WSA. Changes to those policies are beyond the scope of this plan.
142 / 004	All Wilderness Study Areas should be managed under National Park Service guidelines and regulations. The preferred alternative should include designation of North Laidlaw Park, one of the least disturbed, large areas of sagebrush st.eppe, as an Area of Critical Environmental Concern.	NPS and BLM are required follow their individual agency management policies including the management of WSA. Changes to those policies are beyond the scope of this plan.

Topic Wilderness Study Areas

Letter No./ Comment No.	Comment	Response
122 / 009	NPS/BLM must work to protect all roadless areas and WSAs within the expanded Monument. In fact, NPS/BLM must adopt an Alternative that restores the integrity of WSAs that have suffered incursions by motorized vehicles since the original designation of those WSAs. As we have stated above, these areas represent one of the greatest attributes of the Monument and represent the core of the Monument expansion's long term legacy to the American people.	The Proposed Plan/FEIS classifies most WSAs in the Pristine Zone where any existing vehicle routes would be closed to unauthorized motorized use.
128 / 010	The NPS should expand and propose WSAs for wilderness protection then manage them to strictly protect these proposals.	Almost 440,000 acres (94%) of NPS lands in the Monument are either designated wilderness or wilderness study areas. Existing law and policy require protection of the wilderness character of these lands.
121 / 010	The management plan for the Monument should identify a process by which Wilderness Study Areas not currently recommended for wilderness designation are reevaluated for their wilderness characteristics and suitability for wilderness designation. These BLM and NPS lands were evaluated users and decades ago for their eligibility to be included in the National Wilderness Preservation System. Today many of these lands still provide solitude, naturalness, scenic beauty and other wilderness characteristics that may have been overlooked and would make them eligible for wilderness designation. We also ask you to evaluate and inventory any lands that may qualify for Wilderness Study Area status, but were not inventoried during the original process.	The agencies previously inventoried lands within the current Monument boundaries to determine areas with wilderness qualities. These inventories began in the 1960s and continued through the 1980s. These studies resulted in designation of the 43,243 acre Craters of the Moon Wilderness in 1970 and 469,009 acres of Wilderness Study Areas of which 408,110 acres have been recommended to the U.S. Congress for designation. Existing law and agency policy require management of Wilderness Study Areas to protect the wilderness qualities until Congress determines whether or not to designate the lands as wilderness. The agencies do not believe the land use situation within or adjacent to the Monument warrants re-inventory of lands for wilderness suitability.
105 / 010	NPS management of WSAs calls for management as ifthe area were designated wilderness. BLM management of portions of WSAs should be coordinated w/ NPS management and should rise to a higher standard – equivalent w/ NPS standards, in order to help prevent confusion and resource damage and degradation. There is nothing in BLM's IMP re: WSAs that prohibits or discourages management to a higher standard – especially on discretionary issues such as roads. We appreciate the recognition, common to all alternates, of our comments regarding the 660-foot strip of non-wilderness between the Craters of the Moon Wilderness boundary and the original Monument boundary. (DEIS p. 30).	The Proposed Plan/FIS includes direction for NPS and BLM to develop a joint Wilderness Management Plan for all wilderness and wilderness study areas within the Monument. Both agencies must follow individual agency policies which include making detailed management decisions in an implementation plan. The Proposed Plan/FEIS classifies most WSA lands, including those on BLM portions of the Monument, as Pristine Zone which is closed to non-administrative motorized and mechanized vehicle use.

Topic Wilderness Study Areas

Letter No./ Comment No.	Comment	Response
121 / 011	Wilderness Study Area status should be granted to any eligible areas left out of the wilderness designation in the "old" NPS national Monument because of the idea that a "buffer-strip" was needed between designated wilderness and non-wilderness. This wilderness designation was, along with the wilderness on Petrified Forest Nation Park, one of the first two wilderness designations within the NPS. The then-director was not friendly toward wilderness, so there were all sorts of bad policies that sought to minimize wilderness came out to the outer Monument or Monument boundary, there would have to be a non-wilderness "buffer-strip." That idea has since been proven to be false and the policy was changed a few years later. However, we are not aware that this issue was ever corrected for the Craters of the Moon Wilderness Area.	In the event that portions of the Great Rift WSA adjacent to the Craters of the Moon Wilderness are designated as wilderness, the draft plan/EIS (page 30) recommends that the non-wilderness buffer strip within the NPS Monument be designated wilderness as well. This management action has been retained in the Proposed Plan/FEIS.
123 / 040	Wilderness Management actions should include removal of livestock projects that may be impairing Wilderness values. The DEIS should provide a summary of monitoring data for WSAs that examines any livestock impacts.	WSA's have specific regulations which already guide activities and associated impacts. Under the DEIS managers would continue to have the authority to remove livestock or livestock facilities for resource benefit if needed. Livestock projects within WSA are managed according to BLM's Interim Management Policies for Lands under Wilderness Review, Handbook H8550-1 to prevent impairment of wilderness values.
123 / 057	In addition, the DEIS could take this opportunity to expand Wilderness recommendations – but unfortunately has not done so. We ask that an expanded analysis of additional roadless lands suitable for Wilderness be included as part of the SEIS. Plus, the effects of (and intrusions into) Wilderness vary under Alternatives, even without any analysis of grazing changes. For example, herbicide dust may blow into Wilderness under the treatment Alt. (D), killing or weakening plants inside Wilderness. As Alt. D maximizes the number of Open roads leading to and even bordering WSAs, the likelihood of human-caused fires is increased under Alt. D. Noise from vehicles, which travels for several miles in clear desert air will be greater under Alt. D. Likelihood of weed invasion form vehicle-transported weeds areas near WSAs, and ultimately into WSAs is increased under Alt. D.	The agencies do not believe the land use situation within or adjacent to the Monument warrants re-inventory of lands for wilderness suitability. The general nature of this type of broad plan makes analysis of the potential impacts from "herbicide dust" blowing into Wilderness nearly impossible. Analysis of such potential impacts will be conducted for site specific restoration projects. The Proposed Plan/FEIS expands the Pristine Zone (as compared to the draft Alternative D) to include almost all of the WSA. These areas would be closed to motorized vehicle use. The potential for spread of invasive weeds and creation of unauthorized vehicle routes is noted on page 217 of the Draft EIS(second to last paragraph).

Topic Wilderness Study Areas

Letter No./ Comment No.	Comment	Response
123 / 107	As part of this process, an inventory of all lands should be conducted to determine if additional roadless acreages lying outside WSAs exist, and if closing minor two tracks or ways would result in expanded wilderness-potential acreage. If so, where are they? How will Alt. D (and all alternatives) affect the possible future expansion of WSAs/Wilderness? What is the condition of all roads, ways, trails that currently bound WSAs?	The agencies do not believe the land use situation within or adjacent to the Monument warrants re-inventory of lands for wilderness suitability. The wilderness inventory and recommendation process for BLM lands is summarized pages 127 and 128 of the Draft EIS. The Proposed Plan/FEIS expands the Pristine Zone (as compared to the draft Alternative D) to include almost all of the WSA. These areas would be closed to motorized vehicle use. None of the alternatives propose developments or activities which would preclude future wilderness designation of WSA lands. The status of roads, ways, and trails which bound WSAs is shown in Figure 13 on page 113 of the Draft EIS.

Topic Budget

39 / 003	We would also like to mention that the BLM and National Park Services must be realistic in their expectations based on budgets available for staffing, monitoring, enforcement, interpretation, facilities, maintenance, and resource protection and restoration. There must be appropriate funding available to carry out the actions that will be described in the future management plan.	Comment noted.
142 / 005	The agencies should be realistic in their expectations and projections based on budgets available for staffing, monitoring, enforcement, interpretation, facilities, maintenance, and resource protection. Signage, development, road maintenance, and motorized travel should be kept to a minimum. Only signs necessary for safe orientation within the Monument and to direct visitors to designated motorized routes should be erected.	Comment noted.
142 / 005	The agencies should be realistic in their expectations and projections based on budgets available for staffing, monitoring, enforcement, interpretation, facilities, maintenance, and resource protection. Signage, development, road maintenance, and motorized travel should be kept to a minimum. Only signs necessary for safe orientation within the Monument and to direct visitors to designated motorized routes should be erected.	Comment noted.

Topic Budget

Letter No./ Comment No.	Comment	Response
103 / 006	The agencies should be realistic in its expectations and projections based on budgets available for staffing, monitoring, enforcement, interpretation, facilities, maintenance and resource protection.	Comment noted.
123 / 054	As part of the cost for all alternatives, you must calculate the costs of "restoration" – both the pseudo-restoration you propose under the DEIS definition, and true restoration, with and without continued livestock grazing. Please also calculate the annual costs (including agency staff) of livestock grazing administration, monitoring and facilities to the public on these lands. Here are some questions to be addressed: What will the annual weed suppression costs be over the life of the plan with status quo grazing practices? With significantly reduced livestock numbers? With passive restoration? How long will any of the DEIS' pseudo-restoration projects persist with continued livestock grazing? With significantly reduced livestock grazing? How much will it later cost to restore lands where you plan to shift livestock use as you undertake restoration/treatment? A Supplemental DEIS must be prepared that accurately portrays grazing costs (ecological and economic) and that takes a "hard look" at a broad range of alternatives that significantly address grazing impacts to soils, native vegetation, microbiotic crusts, weed infestation and spread, recreation, native animals, playas, cultural sites, recreational uses, etc. The DEIS must also assess the probability of success (or failure) of any plantings – particularly any plantings employing native vegetation with status quo grazing.	Costs were considered by the agencies in the Choosing by Advantages process used to select the preferred alternative.

Topic Level of Development

Letter No./ Comment No.	Comment	Response
2 / 004	…Monument's outer limits. The draft says that this alternative would minimize the need for development and staffing within Monument. However, on page vi, this same Alternative reflects 'largest weed treatment and prevention of all tools available'.	The minimized need for development and staffing within the Monument would result from the use of partnerships at off-site facilities, under Alternative D.

Topic Management Zones

Letter No./ Comment No.	Comment	Response
124 / 001	I would like to encourage you to designate North LaidlawPark as an ACEC in the plan you are developing.	The commenter did not provide any new information or studies that would update the analysis of relevance and importance criteria, resulting in a determination that ACEC status is warranted. Management direction to protect the high quality vegetation resources in North Laidlaw Park, similar to that proposed for the nominated ACEC, was included in Alternative D (See DEIS p. 49, Vegetation, Including Special Status Species, and Fire Management for Alternative D; and pp. 340, Appendix G). Analysis of the relevance and importance criteria for establishment of North Laidlaw Park as an ACEC did not indicate that ACEC status is required for protection of the area. To further protect the area, the preferred alternative was modified to increase the acreage of Pristine Zone and decrease the acreage of Passage Zone in North Laidlaw Park. Management direction under Alternative D (p. 49) states that the high ecological condition of North Laidlaw Park would be maintained and no new livestock water developments would be allowed.
71 / 001	Designate N, Laidlaw Park as ACEC.	Same response as previous comment.
46 / 001	I oppose the BLM's adoption of Alternative D as the preferred alternative and urge the adoption of Alternative C as the alternative that best preserves the Monument's primitive character. Alternative C provides greater protection for the Monument's natural resources and wildlife by limiting motorized vehicle use and routes. However, I urge the BLM to increase protections for wilderness areas by designating North Laidlaw Park an Area of Critical Environmental Concern and by further restricting road development and maintenance as well as off-road vehicles.	Same response as previous comment.
39 / 002	We also would like to see the Area of Critical Environmental Concern (ACEC) designation for northern Laidlaw Park that is mentioned in Alternative C to be added to Alternative D. We believe this ACEC is an important component in the future management plans.	Same response as previous comment.

Topic Management Zones

Letter No./ Comment No.	Comment	Response
44 / 002	Designate North Laidlaw Park as an Area of Critical Environmental Concern.	The commenter did not provide any new information or studies that would update the analysis of relevance and importance criteria, resulting in a determination that ACEC status is warranted. Management direction to protect the high quality vegetation resources in North Laidlaw Park, similar to that proposed for the nominated ACEC, was included in Alternative D (See DEIS p. 49, Vegetation, Including Special Status Species, and Fire Management for Alternative D; and pp. 340, Appendix G). Analysis of the relevance and importance criteria for establishment of North Laidlaw Park as an ACEC did not indicate that ACEC status is required for protection of the area. To further protect the area, the preferred alterantive was modified to increase the acreage of Pristine Zone and decrease the acreage of Passage Zone in North Laidlaw Park. Management direction under Alternative D (p. 49) states that the high ecological condition of North Laidlaw Park would be maintained and no new livestock water developments would be allowed.
111 / 002	I further object to the agency's refusal to designate an Area of Critical Environmental Concern in Laidlaw Park. Sagebrush steppe is one of the most degraded and endangered habitat types in the West, perhaps particularly on the Snake River Plain. ACEC designation and proper management of Laidlaw Park, including elimination of livestock grazing, would help protect an important, relatively high-quality sagebrush community.	Same response as previous comment.
106 / 002	I have not visited the North Laidlaw Park, but would highly recommend that it be designated as an Area of Critical Environmental Concern, so as to contrast with any improvements in the Laidlaw Park proper.	Same response as previous comment.
95 / 002	I would also urge that Laidlaw Park be designated an Area of Critical Environmental Concern to help better protect the sagebrush communities there.	Same response as previous comment.
44 / 002	Designate North Laidlaw Park as an Area of Critical Environmental Concern.	Same response as previous comment.

Topic Management Zones

Letter No./ Comment No.	Comment	Response
63 / 003	Preservation of natural and cultural resources must take precedence over all development, whether for visitor use or for recreation. Visitors should be encouraged and first directed to the original and more developed portion of the Monument for most interpretation and recreational experiences. Use and visitation to the lands recently added should be for those people seeking... '" solitude and a remote and primitive wilderness experience. The preferred alternative should include designation of North Laidlaw Park, one of the least disturbed, large areas of sagebrush steppe, as an Area of Critical Environmental Concern.	Same response as previous comment.
89 / 003	There is not even a requirement to seed native plant species following a treatment! Plus, the Preferred Alternative rejects designation of an Area of Critical Environmental Concern in Laidlaw Park. An ACEC designation would help protect one of the last remaining better condition sagebrush communities on the entire Snake River Plain.	Same response as previous comment.
81 / 003	An ACEC designation should be considered for LaidlawPark, and native plant species reseeded there.	Same response as previous comment.
73 / 003	In Alternative E, in Chapter 2, Page 30, one of themanagement actions states, "Selected Class D roads in the Primitive and Pristine Zones could be converted to trails or closed for resource protection." Table 5 identifies that 167 miles of these roads are within primitive and Pristine Zones. The Pristine Zone concept is inconsistent with roads in these areas, so 9 miles of roads within the Pristine Zone can be either closed or converted to non-motorized trails. The public should clearly understand the inconsistency between pristine areas and roads in the Final Management Plan. If a primitive road in pristine area needs to remain on the system because of management access or public access, then the area surrounding the road should be reclassified to primitive status to resolve the inconsistency.	See Chapter One, Future Planning Needs, Transportation Planning. In the proposed Management Plan we describe desired future conditions and management actions for the type of roads and access that is appropriate within each of four management zones. The plan also classifies and inventories the type of roads and trails currently in existence within the Monument. Specific decisions on Access and Transportation beyond those already defined in the management zone descriptions will be made in the upcoming implementation level Comprehensive Travel Management Plan. This implementation plan will include a detailed map including all designations for access and travel within the Monument, including road travel restrictions and road closures to meet resource management objectives, such as protection of special status species habitat, defined in the Proposed Plan. There will be no net increase in road mileage under this plan.

Topic Management Zones

Letter No./ Comment No.	Comment	Response
102 / 004	Designate an ACEC in Laidlaw Park that encompasses all remaining sagebrush communities.	The commenter did not provide any new information or studies that would update the analysis of relevance and importance criteria, resulting in a determination that ACEC status is warranted. Management direction to protect the high quality vegetation resources in North Laidlaw Park, similar to that proposed for the nominated ACEC, was included in Alternative D (See DEIS p. 49, Vegetation, Including Special Status Species, and Fire Management for Alternative D; and pp. 340, Appendix G). Analysis of the relevance and importance criteria for establishment of North Laidlaw Park as an ACEC did not indicate that ACEC status is required for protection of the area. To further protect the area, the preferred alternative was modified to increase the acreage of Pristine Zone and decrease the acreage of Passage Zone in North Laidlaw Park. Management direction under Alternative D (p. 49) states that the high ecological condition of North Laidlaw Park would be maintained and no new livestock water developments would be allowed.
88 / 004	Designate an ACEC in Laidlaw Park that encompasses all remaining sagebrush communities.	Same response as previous comment.
63 / 005	Management zoning (i.e. level of development) should maximize the amount of pristine, and then Primitive Zones, with a minimum of passage and even less front country zones. There must be a comprehensive road inventory that is conducted with a management goal of maximizing the miles of roads designated for closure and restoration to natural conditions.	See Chapter One, Future Planning Needs, Transportation Planning. In the proposed Management Plan we describe desired future conditions and management actions for the type of roads and access that is appropriate within each of four management zones. The plan also classifies and inventories the type of roads and trails currently in existence within the Monument. Specific decisions on Access and Transportation beyond those already defined in the management zone descriptions will be made in the upcoming implementation level Comprehensive Travel Management Plan. This implementation plan will include a detailed map including all designations for access and travel within the Monument, including road travel restrictions and road closures to meet resource management objectives, such as protection of special status species habitat, defined in the Proposed Plan. There will be no net increase in road mileage under this plan.
103 / 005	The preferred alternative should include designation of North Laidlaw Park, one of the least disturbed, large areas of sagebrush steppe, as an Area of Critical Environmental Concern.	Same response as previous comment.

Topic Management Zones

Letter No./ Comment No.	Comment	Response
111 / 005	The agencies should designate a Laidlaw Park ACEC that encompasses and protects all remaining sagebrush communities.	Same response as previous comment.
128 / 005	Also, please designate North Laidlaw Butte as part of the unique ACEC (if you need me to more formally propose it, I will if you would contact me), or establish a similar NPS designation if that is needed (after all, you guys are supposed to talk to each other despite your different mandates). Laidlaw Park shares some of the vegetative values with North Laidlaw Butte but with the greater remoteness of the Butte they are less damaged. This could provide a no-livestock grazing study to compare it to Laidlaw Park management. North Laidlaw Butte also has the benefit of providing a beautiful view from above the floor of lava. Please leave this area as undisturbed as possible.	Thank you for your comment.
159 / 005	Plus, the Preferred Alternative rejects designation of an Area of Critical Environmental Concern in Laidlaw Park. An ACEC designation would help protect one of the last remaining better condition sagebrush communities on the entire Snake River Plain.	The commenter did not provide any new information or studies that would update the analysis of relevance and importance criteria, resulting in a determination that ACEC status is warranted. Management direction to protect the high quality vegetation resources in North Laidlaw Park, similar to that proposed for the nominated ACEC, was included in Alternative D (See DEIS p. 49, Vegetation, Including Special Status Species, and Fire Management for Alternative D; and pp. 340, Appendix G). Analysis of the relevance and importance criteria for establishment of North Laidlaw Park as an ACEC did not indicate that ACEC status is required for protection of the area. To further protect the area, the preferred alternative was modified to increase the acreage of Pristine Zone and decrease the acreage of Passage Zone in North Laidlaw Park. Management direction under Alternative D (p. 49) states that the high ecological condition of North Laidlaw Park would be maintained and no new livestock water developments would be allowed.

Topic Management Zones

Letter No./ Comment No.	Comment	Response
70 / 006	Why is the Pristine Zone reduced in Alt. D by some 90,000 acres from Alt C? If the area considered in C is eligible for pristine classification, it should also be so in D. The areas affected seem to be the lava edges which typically contain the greatest biological diversity, frequent cultural areas and no critical roads necessary for administration. Reconfigure Alt D to include the larger Pristine acreage and in Alternative C	See Chapter 2, Alternative D Description and Map. In the Proposed Alternative, Passage Zone was significantly reduced in response to public comment and after additional consideration of the potential impacts to resources. Creating Passage Zone corridors does not mandate an increase in the number or current standard of roads (See chapter 2, Description of Management Zones).
82 / 006	Designate an ACEC in Laidlaw Park that encompasses all remaining sagebrush communities.	The commenter did not provide any new information or studies that would update the analysis of relevance and importance criteria, resulting in a determination that ACEC status is warranted. Management direction to protect the high quality vegetation resources in North Laidlaw Park, similar to that proposed for the nominated ACEC, was included in Alternative D (See DEIS p. 49, Vegetation, Including Special Status Species, and Fire Management for Alternative D; and pp. 340, Appendix G). Analysis of the relevance and importance criteria for establishment of North Laidlaw Park as an ACEC did not indicate that ACEC status is required for protection of the area. To further protect the area, the preferred alternative was modified to increase the acreage of Pristine Zone and decrease the acreage of Passage Zone in North Laidlaw Park. Management direction under Alternative D (p. 49) states that the high ecological condition of North Laidlaw Park would be maintained and no new livestock water developments would be allowed.
125 / 007	BLM is apparently attempting a zone management concept, which is not authorized by law or regulation. BLM must formulate management plans that reflect the policy of the United States regarding all public lands, including National Monuments.	Thank you for your comment.

Topic Management Zones

Letter No./ Comment No.	Comment	Response
125 / 008	The effort to designate "Primitive Zones" within the Monument Plan process violates FLPMA. "Pristine Zones" are. in essence. de-facto Wilderness management. This violates law and regulation. Section 201 of FLPMA places a general requirement on BLM to inventory all public lands for various resource values. Section 202 contains general planning provisions. Both require BLM to manage using the principles of multiple use and sustained yield. Neither mention wilderness specifically nor do they suggest any justification for the approach suggested in this planning effort – i.e. designation of "Wilderness/Primitive/Pristine Lands". The planning team may not like it, but Congress has established a policy for managing public lands. The development of preliminary alternatives that include designating "Management Areas" is an attempt to subvert BLM's policy mandate. FLPMA Title II, particularly subsection (c)(1) that specifically requires development and revision of land use plans on the basis of "principles of multiple use and sustained yield," FLPMA section 102(a)(7) also specifically requires that "goals and objectives be established by law as guidelines for public land use planning, and that management be on the basis of multiple use and sustained yield unless otherwise specified by law. Attempting to exclude lands from multiple use mandate via the designation of "Management Areas" or "Management Zones" also subverts the implementing regulations found at 43 C.F.R. 1600 et seq. that require planning based upon multiple use and sustained yield, including subsection 1601.0-2: "The objective of resource management planning by the BLM is to maximize resource values for the public through a rational, consistently applied set of regulations and procedures which promote the concept of multiple use management and ensure participation by the public, state and local governments, Indian tribes and appropriate Federal agencies. ..." For the most part, the BLM has totally ignored the FLPMA Section 603 wilderness inventories, studies, and decisions. It also completely ignores the extensive data and public input collected during the 603 process. It also ignores the fact that all BLM lands (except in Alaska) have been previously inventoried for wilderness values under Section 603 and formal recommendations made to the Congress by the President of the United States, as required. The BLM is totally ignoring decades of prior wilderness policy, procedures and guidance on wilderness inventories, existing inventory records,	The DEIS does not violate FLMPA.

Topic Management Zones

Letter No./ Comment No.	Comment	Response

official determinations of wilderness suitability and unsuitability. There is no justification, no mandate in FLPMA and no process requirement for managing lands in management zones that resemble wilderness management, or are de-facto Wilderness management. Under FLPMA §603, the Secretary of the Interior was directed to review the public lands and identify those areas that meet the wilderness criteria contained in sec. 2(c) of the Wilderness Act, 16 U.S.C. § 1131 (c). Those areas that have wilderness characteristics were then to be studied to determine their suitability for inclusion in the National Wilderness Preservation System. The Secretary was required to make recommendations on their suitability or nonsuitability to the President by Oct. 21, 1991. That date has expired. Congress clearly set its deadline. Congress did not authorize a never ending wilderness inventory and review process outside FLPMA §603. Additionally, and importantly, the Federal Courts have weighed in on management paradigms that resemble or are de-facto Wilderness Areas. In "State of Wyoming v United States Department of Agriculture" (01-CV-86-B) Judge Clarence Brimmer ruled: In establishing the NWPS [National Wilderness Preservation System], Congress unambiguously provided that "no Federal lands shall be designated as 'wilderness areas' except as provided for in [the Wilderness Act] or by a subsequent Act." Brimmer goes on to note: In fact, the primary purpose of the Wilderness Act was to provide: [a] statutory framework for the preservation of wilderness [that] would permit long-range planning and assure no further administrator could arbitrarily or capriciously either abolish wilderness areas that should be retained or make wholesale designations of additional areas in which use would be limited. (quoting H.R. Rep. No. 88-1538).

Topic Management Zones

Letter No./ Comment No.	Comment	Response
125 / 009	Creating "Pristine Zones" pursuant to FLPMA .&202 is an attempt to subvert Congressional directives found throughout Title II of FLPMA. The planning team is unlawfully attempting to make wilderness the priority way to protect the resources identified in 102(a)(8) instead of ACECs. The use of Pristine Areas or an attempt to substitute the Congressional directive found at Section 201 (a) of FLPMA calling for the Secretary to "prepare and maintain on a continuing basis an inventory of all public lands and their resources and other values (including, but not limited to, outdoor recreation and scenic values), giving priority to areas of critical environmental concern [ACEC] (emphasis added). This is contrary to Congressional directive found in Title II and Title VI of FLPMA. The Congressional directive found at Section 201 (a) of FLPMA calls for the Secretary to "prepare and maintain on a continuing basis an inventory of all public lands and their resources and other values (including, but not limited to, outdoor recreation and scenic values), giving priority to areas of critical environmental concern [ACEC] (emphasis added), not wilderness or "Pristine Zones" or other such de-facto WSA. Naturally, BLM may formulate management plans that protect Monument resources, but it must do so lawfully, using site specific use allocations or the ACEC. BLM may not use the Zone Management concept. BLM should abandon the concept of establishing "Pristine Zones", BLM should abandon the concept of managing for "wilderness character", by designating "Management Zones" are de-facto WSAs (such as Pristine Management Areas) that are not authorized by law. When attempting to manage for "Pristine" and/or "unconfined recreation" BLM must use sound and valid principles of recreation management and legally authorized designations such as those contained in the Recreation Opportunity Spectrum. BLM should seek to manage for sensitive resources by developing site specific management plans formulated pursuant to the designation of Areas of Critical Environmental Concern.	The DEIS does not violate FLMPA.

Topic Management Zones

Letter No./ Comment No.	Comment	Response
70 / 010	How does the restoration acreage correlate with the 90,000 acres of Pristine Zone shift discussed in Zone Characterizations?	The intent of the increase in restoration acreage in Alt. D over Alt. C was to treat as much of the area in the Monument that has been identified as having poor ecological integrity as possible over the life of the plan. (See Jurs and Sands 2004 and map of potential restoration acreages, included in the Proposed Plan/FEIS.) Some of this area is in Wilderness Study Area. In Alternative C, the boundaries for the Pristine Zone were synonymous with the WSA boundary, regardless of ecological condition (See DEIS, p. 23, for zone descriptions). Zoning, or WSA status, does not exclude the potential for restoration treatment -- it simply prescribes the range of treatment methods that should be used given the designation. The intent of Alt. C was to have more focus on preservation as opposed to proactive restoration. The proposed restoration acreages were estimated with that intent in mind.
105 / 013	We encourage expansion of the Pristine Zone beyond even alternative C's recommendations. Pristine zoning should not be excluded from an area just because there currently exists a medium probability of encountering livestock and associated facilities. We also encourage expansion of the Primitive Zone beyond the amount called for in any of the alternatives. Primitive Zoning should be the second most common amount of land in the preferred alternative.	Thank you for your suggestions.
123 / 014	The ACEC should be part of ALL Alternatives analyzed. Extreme political bias has been introduced into this process- basically, the livestock industry and Bush administration despises land protection. Since ACEC provides an opportunity for special management. The sad thing here is how much the ACEC lands are currently being impacted (and community condition eroded) due to livestock grazing and especially associated spread of exotic species.	The commenter did not provide any new information or studies that would update the analysis of relevance and importance criteria, resulting in a determination that ACEC status is warranted. Management direction to protect the high quality vegetation resources in North Laidlaw Park, similar to that proposed for the nominated ACEC, was included in Alternative D (See DEIS p. 49, Vegetation, Including Special Status Species, and Fire Management for Alternative D; and pp. 340, Appendix G). Analysis of the relevance and importance criteria for establishment of North Laidlaw Park as an ACEC did not indicate that ACEC status is required for protection of the area. To further protect the area, the preferred alternative was modified to increase the acreage of Pristine Zone and decrease the acreage of Passage Zone in North Laidlaw Park. Management direction under Alternative D (p. 49) states that the high ecological condition of North Laidlaw Park would be maintained and no new livestock water developments would be allowed.

Topic Management Zones

Letter No./ Comment No.	Comment	Response
70 / 017	there is a general agreement that we need to guide visitors towards the main visitor facilities along the Frontcountry Zone and in the Kings Bowl area, but there is no discussion of how that area is to be redeveloped to encourage visitors.	This plan is intended to provide a general framework for how the Monument in general will be managed, and a little more specifically what to expect within the different zones, such as the Frontcountry Zone. This is the "what". The "how" will be developed in concert with public input in later implementation level planning. Expanding the visitor center, reconstructing roads and parking areas, and trail improvements are already underway or planned for the near future within the existing Frontcountry zoned area managed by the NPS adjacent to U.S. Highway 20/26/93.
165 / 027	Page 337-Appendix G Proposed Laidlaw Park ACEC: The document states that ACEC designation may not be necessary because "current management, regulation, and law provide sufficient protection for the values identified." Given that Laidlaw Park is unique and valuable because of its plant community, the Service recommends it be provided the protection given by ACEC designation and the prioritization of resource conservation it affords.	The commenter did not provide any new information or studies that would update the analysis of relevance and importance criteria, resulting in a determination that ACEC status is warranted. Management direction to protect the high quality vegetation resources in North Laidlaw Park, similar to that proposed for the nominated ACEC, was included in Alternative D (See DEIS p. 49, Vegetation, Including Special Status Species, and Fire Management for Alternative D; and pp. 340, Appendix G). Analysis of the relevance and importance criteria for establishment of North Laidlaw Park as an ACEC did not indicate that ACEC status is required for protection of the area. To further protect the area, the preferred alternative was modified to increase the acreage of Pristine Zone and decrease the acreage of Passage Zone in North Laidlaw Park. Management direction under Alternative D (p. 49) states that the high ecological condition of North Laidlaw Park would be maintained and no new livestock water developments would be allowed.

Topic Management Zones

Letter No./ Comment No.	Comment	Response
123 / 110	DEIS at 130. We are deeply disappointed at the inclusion of the Laidlaw ACEC only under Alt. C. You have provided no legitimate rationale, science-based or otherwise, for not recognizing it as an ACEC under all Alternatives. How is designation of an ACEC incompatible with any of the alternatives? How can designation of an ACEC not significantly help you to attain your goals? You cannot claim that it will prohibit restoration. In fact, it will significantly help all forms of passive restoration. Plus, your extreme aggressive pseudorestoration is not going to occur in the northern part of Laidlaw Park anyway - unless through continued abusive livestock grazing and overstocking, BLM succeeds in turning what in the early 1990s was described as one of the best remaining the sagebrush-steppe communities still extant in the Snake River Plain into a cheatgrass wasteland.	Same response as previous comment.
123 / 183	Laidlaw Park requires Special Management Attention because it is a remnant court ruling on Laidlaw Park S&G EA and Determination deficiencies and flaws.	Please refer to DEIS Appendix G, pp. 337-341. The ID team followed the appropriate process in analyzing the values in North Laidlaw Park to determine if the area qualified for ACEC status. The proposed ACEC was included and analyzed in Alternative C, the logical alternative to include the potential protection provided by the proposed ACEC. Further, to demonstrate a commitment to maintaining the high ecological condition of the area, protective measures were included in Alternative D, the preferred alternative, that limit livestock developments, specifically to maintain the light use that the area has received for years and that has resulted in the current condition (DEIS p. 49). Additional protective measures have been included in the Proposed Plan/FEIS, including decreasing the acreage of Passage Zone and increasing the acreage of Pristine Zone in Laidlaw Park. By comparing the effects of managing the area as an ACEC in Alternative C with the effects of managing the area with the protective measures in Alternative D we found no advantage in designating the area an ACEC and that we can achieve the same results with the protective measures in Alternative D. Therefore we concluded that it is unnecessary to designate the area as an ACEC.

Topic Soundscape

Letter No./ Comment No.	Comment	Response
104 / 011	Regarding the visitor experience, there needs to be astronger statement under desired future conditions and management actions. There should be two additions including: (1) “no commercial air tour landing within the Monument” and (2) “no commercial over flight of Pristine Zones.”	Neither BLM nor NPS have authority to regulate aircraft over-flights. Non-emergency and non-administrative aircraft landings are not authorized on 65% of the Monument (NPS lands).
104 / 012	Cumulative impacts of Alternative D from roads, commercial flights and landings, and radio tower locations should be considered major, not minor. Vehicular traffic would increase significantly due to the increase in designated Passage Zone, which would degrade the soundscape further than the status quo. Thus it is difficult to comprehend why the impacts would be listed as similar to those of Alternative A. Additionally, given that commercial services are emphasized in this alternative with a focus on outfitter and guide services, it seems likely that the soundscape would be adversely affected more from this alternative than from any other offered alternatives. It also seems likely that this emphasis would further increase air traffic in the area.	The cumulative impacts of Alternative D from roads, commercial flights, outfitters and guides, and radio towers is expected to be minor because none are expected to increase substantially in the next 20 years. The miles of road in the Passage Zone has been reduced in Alternative D of the Final EIS, thus reducing the impact level of roads.
123 / 123	How much noisier will these lands be with more upgraded roads, more livestock facilities or more water hauling? How much noise do livestock facilities or water hauling currently generate? For example, sounds from generators at wells can carry for several miles in arid desert air.	The agencies do not foresee a dramatic increase in noise under any of the alternatives.
123 / 174	Upgraded roads would mean more livestock water hauling,and thus increased loud vehicle noise (likely diesel truck). More livestock grazed with more facilities, or shifted use, will result in more unnatural livestock sounds disturbing wild land settings.	Once again the DEIS does not mandate upgrading roads or more facilities. BLM does not anticipate an increase in livestock water hauling activities. In fact there are proposals which would reduce water hauling in the Monument. New facility impacts would be evaluated and would conform with resource objectives.

Topic Viewscape

Letter No./ Comment No.	Comment	Response
70 / 005	In a landscape that features a night viewscape without any light intrusion, p. 02- it is hard to understand or justify the conclusion that the effects of lighted towers, "on solitude and natural conditions in wilderness areas (and anywhere else in the Monument) could be negligible to minor." The effects of night light from towers will be both long term and major and needs to acknowledge in the plan by not allowing such construction.	Currently lighted towers do not exist within Craters of the Moon National Monument and this Plan neither proposes nor endorses the construction of lighted towers within the Monument. While the plan does provide guidance to help prevent lighted tower installation within the Monument, the Plan also can not specifically prohibit such installations because previously existing federal law, regulation and policy governing the siting and installation of communications facilities could, under certain circumstances, trump the management direction in this Plan. In such cases, appropriate NEPA analysis and BLM and NPS policies designed to minimize contrasts to characteristic natural landscapes would be applied. A few lighted towers, located outside the Monument can be seen from within the Monument in certain areas, particularly on the south end. Lighted towers would not be allowed in Wilderness areas.
104 / 013	In a landscape that features a night viewscape without any light intrusion, it is hard to understand or justify the conclusion that the effects of lighted towers "…on solitude and natural conditions in wilderness areas could be negligible to minor…" (P. 214). Unimpeded night views are an increasingly rare natural resource which should be protected through adherence to dark shy principles. The adverse effects of night light from towers will be both long term and major and needs to be acknowledged when discussing future plans for constructing new structures in the area.	Refer to the Management Action under Visual Resources, Management Guidance common to All Alternatives. The light intrusion from lighted towers is considered minor because the locations of present towers and potential future towers are not visible from the majority of the Monument.

Topic Grazing

Letter No./ Comment No.	Comment	Response
159 / 001	The EIS, jointly prepared by BLM and the NPS, fails to take actions necessary to protect the vanishing Craters sagebrush ecosystem and its plummeting sage grouse, pygmy rabbit and migratory songbird populations. 30% of the BLM-managed lands (these are the lands that are grazed by livestock-NPS manages the ungrazed lava) are in such poor condition that BLM proposes massive "treatments" .Instead of analyzing alternatives that change cattle and sheep grazing disturbance, a primary cause of the weed infestations and altered fire cycles that plague the Monument, all four agency alternatives keep livestock grazing constant, and make no significant changes in grazing at all.	This EIS has identified which lands are available for livestock grazing (See page 117, chapter 3, under Livestock Grazing). This fulfils BLM Land Use Planning Appendix C requirements for decisions pertaining to Livestock Grazing.

Topic Grazing

Letter No./ Comment No.	Comment	Response
107 / 001	It is strongly proposed that all fences should be taken out of Laidlaw Park allotment and that livestock shall be free to graze without fenced pastures. Fenced pastures were erected for cattle grazing in order to practice rest rotation but positive results have not materialized. Rest rotation absolutely is not a good practice for domestic sheep and wildlife use. Fenced-in rest rotation has not contributed positively in Laidlaw Park allotment. Cattle permittees in Laidlaw Park did not license for the year 2004 grazing season because it was not economical, since fencing of the pastures added to their demise with limited water availability. Cattlemen believe that the Laidlaw Park cattle grazing has become too expensive and does not provide for sufficient gains for meat production under present conditions.	Thank you for your comment. We will consider these points in the appropriate implementation ad project-level plans.
111 / 001	The Craters sagebrush ecosystem is at risk, as are native animal species, especially sage grouse, pygmy rabbit, and migratory songbirds, that it supports. The BLM and the NPS each has an obligation to take steps to conserve these species. Yet the Plan and DEIS ignore the most obvious first step of any solution to the Preserve's weed and altered fire regime problems-removing cattle and sheep from these areas. The "treatments" (use of herbicides, mechanical and fire treatments, and seedings) that BLM proposes instead would be expensive, wasteful, and/or destructive. Because the DEIS wholly fails to consider reducing or eliminating livestock grazing, it is plainly inadequate. The DEIS and plan are also flawed for failing to consider closing roads and for actually proposing to upgrade roads in "primitive" zones.	This EIS has identified which lands are available and unavailable for livestock grazing (See page 117, Chapter 3 under Livestock Grazing). This fulfills BLM Land Use Planning Appendix C requirements for decisions pertaining to Livestock Grazing. The S&G process is the chosen method to address livestock stocking rates rather than across the board reductions or increases because it allows managers to assess each grazing allotment individually and determine if adjustments are needed in the allotment. None of the alternatives mandate grazing to continue at existing levels. The Proclamation expanding the Monument states: “Laws, regulations, and policies followed by the BLM in issuing and administering grazing permits or leases on all lands under its jurisdiction shall continue to apply with regard to the lands in the Monument administered by the BLM.” Therefore, a No Grazing alternative was not considered viable. The BLM does have flexibility to adjust livestock grazing management to help achieve desired resource objectives.

Topic Grazing

Letter No./ Comment No.	Comment	Response
106 / 001	There is far too much emphasis on increasing roads in the Monument (read more fragmentation) and I see no attempt to reduce grazing by cattle and sheep. I have conducted two Breeding Bird Survey (BBS) Routes in the Craters area for the last 15+ years. These are twenty-five mile routes with three-minute stops every half mile, starting at a half-hour before dawn, and run each June. One runs from US 93 near Carey and runs through Paddleford Flats and on down toward Kamima. The other starts at the Craters headquarters and ends in Arco. I have noticed in both BBS routes that sagebrush obligate birds, such as Brewer's sparrows, sage sparrows, and sage thrashers are found in far greater numbers in ungrazed portions, such as near the headquarters area, and in inaccessible areas of rugged lava/sage interface. I have encountered sage grouse also in these areas, but not on an annual basis. As I get into more degraded areas, or those with more introduced grasses, such as crested wheatgrass, I find only generalist species of birds, such as vesper sparrows, homed larks or western meadowlarks. There seems to be an abrupt transition in both routes, and it is associated with grazing of domestic livestock and conversion of native shrub-steppe to grasslands. I noted in the DMP/EIS that there -, are plans to plant hybrid perennial grasses for rehabilitation of depleted areas, and I caution you not to do this to large areas, as native wildlife populations remained reduced for extensive time periods (Reynolds and Trost, 1979, 1980, & 1981). Both the Paddleford Flats and Laidlaw Park areas seem quite depleted of sagebrush obligate birds, despite the fact that sage is the most abundant vegetation. This year I had to wait for a large flock of sheep that were being trailed north on the Carey-Kamima Road towards Paddleford Flats. Detection of birds in the wake of the sheep was almost nil for several miles. This was in June, the breeding season for these birds, and the area looked like a war zone after the sheep had passed -almost none were detected. I would bet that avian productivity was reduced to near zero for at least one hundred meters on each side of the road. My question is, why can't these sheep be trucked to summer pastures the way it is done in much of the Arco Desert?	In response to this and similar comments, modifications were made in the Proposed Plan/FEIS to reduce the number and size of areas zoned as Passage within the Monument. Sheep are occasionally trucked.

Topic Grazing

Letter No./ Comment No.	Comment	Response
161 / 001	There is a conflict of interest written into this plan that I find confusing. At the same time that you intend "no net loss" of sagebrush steppe communities, you also intend sustainable forage for livestock, yet you also plan "minimizing of invasive species" by the use of herbicides. Forgive me for feeling like I have to point out something so obvious, but livestock IS AN INVASIVE SPECIES. The historical overgrazing by livestock is directly linked to the decline in sagebrush areas and the increase in invasive species. Thousands of acres of cheatgrass and crested wheatgrass currently existing inside the Monument are also all INVASIVE SPECIES. So I strongly suggest that you go back to the drawing board and come up with an alternative which drastically reduces livestock thus limiting the spread of weeds, thereby INCREASING the sagebrush communities and wildlife habitat. "No net loss" of sage habitat is one sad goal. In tons, how much herbicide do you intend to use within the Monument over the next decade? What a catastrophe. Please just get to the correct solution immediately. Get rid of the livestock and let the biologists guide a return to a healthy natural state. It will cost us all a lot less in dollars, destroyed ecosystems, lost habitat, lost species, herbicidal health effects, time and stress. No cows or sheep, no rolling acres of wheat lined by invasive species, no extra roads serving livestock facilities, restored sage communities, watersheds functioning naturally... That's a Craters of the Moon Monument that I want to visit. Thank you for listening to me.	This EIS has identified which lands are available and unavailable for livestock grazing (See page 117, Chapter 3 under Livestock Grazing). This fulfills BLM Land Use Planning Appendix C requirements for decisions pertaining to Livestock Grazing. The S&G process is the chosen method to address livestock stocking rates rather than across the board reductions or increases because it allows managers to assess each grazing allotment individually and determine if adjustments are needed in the allotment. None of the alternative mandate grazing to continue at existing levels. The Proclamation expanding the Monument states: “Laws, regulations, and policies followed by the BLM in issuing and administering grazing permits or leases on all lands under its jurisdiction shall continue to apply with regard to the lands in the Monument administered by the BLM.” Therefore a No Grazing alternative was not considered viable. The BLM does have flexibility to temporarily remove livestock to help achieve desired resource objectives.
88 / 001	The EIS, jointly prepared by BLM and the NPS, fails to take actions necessary to protect the vanishing Craters sagebrush ecosystem and its plummeting sage grouse, pygmy rabbit and migratory songbird populations. 30% of the BLM-managed lands (these are the lands that are grazed by livestock- NPS manages the ungrazed lava) are in such poor condition that BLM proposes massive "treatments". Instead of analyzing alternatives that change cattle and sheep grazing disturbance, a primary cause of the weed infestations and altered fire cycles that plague the Monument, all four agency alternatives keep livestock grazing constant, and make no significant changes in grazing at all.	This EIS has identified which lands are available and unavailable for livestock grazing (See page 117, Chapter 3 under Livestock Grazing). This fulfills BLM Land Use Planning Appendix C requirements for decisions pertaining to Livestock Grazing. The S&G process is the chosen method to address livestock stocking rates rather than across the board reductions or increases because it allows managers to assess each grazing allotment individually and determine if adjustments are needed in the allotment. None of the alternative mandate grazing to continue at existing levels. The Proclamation expanding the Monument states: “Laws, regulations, and policies followed by the BLM in issuing and administering grazing permits or leases on all lands under its jurisdiction shall continue to apply with regard to the lands in the Monument administered by the BLM.” Therefore a No Grazing alternative was not considered viable. The BLM does have flexibility to temporarily remove livestock to help achieve desired resource objectives.

Topic Grazing

Letter No./ Comment No.	Comment	Response
89 / 001	The Draft Management Plan and EIS for Craters of the Moon National Monument and Preserve fails to take actions necessary to protect the vanishing Craters sagebrush ecosystem and its plummeting sage grouse, pygmy rabbit and migratory songbird populations. Instead of analyzing alternatives that change cattle and sheep grazing disturbance, a primary cause of the weed infestations and altered fire cycles that plague the Monument, all four agency alternatives keep livestock grazing constant, and make no significant changes in grazing at all.	Same response as previous comment.
127 / 001	As to the continued management of the Craters, Butte County first priority is expecting the multiple use policy will be followed which allows for continued grazing and hunting on the parts of the Monument as was promised at the time the Craters was expanded.	The Draft Plan/EIS did not propose any new closures to hunting or the elimination of livestock grazing.
81 / 001	It is clear that all of the Alternatives offered are heavily weighted toward livestock production, with little regard for wildlife habitat, native vegetation, and biodiversity. None of the four Alternatives seriously addresses grazing impacts, leaving livestock levels basically unchanged. In the interest of true multiple use, I strongly urge you to prepare a Supplemental EIS which would include a science based assessment of grazing suitability of the lands in question. The supplemental EIS should consider changes to and reduction of grazing, especially as they would relate to weed spread, habitat destruction and water quality issues.	This EIS has identified which lands are available and unavailable for livestock grazing (See page 117, Chapter 3 under Livestock Grazing). This fulfills BLM Land Use Planning Appendix C requirements for decisions pertaining to Livestock Grazing. The S&G process is the chosen method to address livestock stocking rates rather than across the board reductions or increases because it allows managers to assess each grazing allotment individually and determine if adjustments are needed in the allotment. None of the alternative mandate grazing to continue at existing levels. The Proclamation expanding the Monument states: "Laws, regulations, and policies followed by the BLM in issuing and administering grazing permits or leases on all lands under its jurisdiction shall continue to apply with regard to the lands in the Monument administered by the BLM." Therefore a No Grazing alternative was not considered viable. The BLM does have flexibility to temporarily remove livestock to help achieve desired resource objectives.
129 / 001	The number of grazing permits and active AUMs has remained in tact in the area managed by the BLM (BLM). While this is critical to the continued viability of the livestock operations that depend on these areas for a portion of the yearlong forage requirements, it is just as critical that the permittees be able to access these areas for administrative purposes. Areas key to the success of rangeland grazing operations include water sources, salt and mineral distribution sites, and other facilities used throughout the grazing season. Access to these areas must be included as an distractive term of the grazing permit.	The Management Plan maintains access to permittees for administrative purposes. See page 116 of the DEIS.

Topic Grazing

Letter No./ Comment No.	Comment	Response
123 / 001	The DEIS not present a reasonable range of alternatives related to livestock grazing. We request that a Supplemental EIS be prepared that addresses a wide range of DEIS deficiencies, especially in relation to livestock grazing and its current and future effects, as described throughout the following comments. Livestock grazing is the overwhelmingly dominant land use on almost every acre of the Monument that is not solid lava. It is leading to rapid deterioration and alteration of the native sagebrush vegetation and associated wildlife species.	This EIS has identified which lands are available and unavailable for livestock grazing (See page 117, Chapter 3 under Livestock Grazing). This fulfills BLM Land Use Planning Appendix C requirements for decisions pertaining to Livestock Grazing. The S&G process is the chosen method to address livestock stocking rates rather than across the board reductions or increases because it allows managers to assess each grazing allotment individually and determine if adjustments are needed in the allotment. None of the alternative mandate grazing to continue at existing levels. The Proclamation expanding the Monument states: "Laws, regulations, and policies followed by the BLM in issuing and administering grazing permits or leases on all lands under its jurisdiction shall continue to apply with regard to the lands in the Monument administered by the BLM." Therefore a No Grazing alternative was not considered viable. The BLM does have flexibility to temporarily remove livestock to help achieve desired resource objectives.
159 / 002	Instead of analyzing alternatives that change cattle and sheep grazing disturbance, a primary cause of the weed infestations and altered fire cycles that plague the Monument, all four agency alternatives keep livestock grazing constant, and make no significant changes in grazing at all.	Same response as previous comment
82 / 002	even allows upgrading of roads in "primitive" zones. Effects of grazing and roads upon weed dispersal, erosion, and wildlife habitat are well documented in the literature. All alternatives considered would continue grazing at the same level as is currently in effect.	Temporary removal of livestock is a viable action taken to protect areas from impacts associated with livestock grazing. This is commonly done during restoration efforts. None of the alternatives mandate grazing to continue at the current levels. Chapter 3 is a description not a mandated prescription/alternative of existing conditions. It allows grazing to continue at present levels until individual allotment assessments determine the need to make adjustments to meet standards as stated on page 120 paragraph 1.

Topic Grazing

Letter No./ Comment No.	Comment	Response
162 / 002	We are however, concerned regarding the status of livestock grazing management within the Monument and the lack of analysis in the DEIS. The Laidlaw Park portion of the Monument maintains one of the last remaining large, contiguous blocks of low elevation sagebrush habitat in the area administered by the BLM's Shoshone Field Office. This area provides critical breeding, brood rearing, and winter habitat for sage-grouse and other sagebrush dependent wildlife. In addition, the allotment provides important seasonal habitat for pronghorn and elk and important transition range for migrating mule deer. Improper grazing management can constitute a significant impact to vegetation resources and subsequent wildlife habitat. Alteration of plant community structure, species diversity, and plant abundance can impact the availability of food and cover resources for wildlife. In addition, grazing livestock and associated operations can displace wildlife from seasonally important habitats including breeding and nesting habitat and winter range. We recognize grazing has historically occurred within the Monument expansion since post settlement by pioneers. Further, we acknowledge the administrative rationale to address grazing management on the Monument through the BLM's. Standards and Guidelines process. However, analysis relative to impacts of livestock grazing on wildlife resources and other features common to a visitor's expectation should be reviewed in this EIS. In technical correspondence to BLM regarding the standards and guidelines assessment of the Laidlaw Park Allotment, we identified several wildlife related issues and provided management recommendations to address the needs of wildlife on the allotment (see attached). The assessment noted a general lack of species and structural diversity (forbs and large, perennial bunchgrasses) throughout the Laidlaw Park Allotment coupled with a widespread distribution and abundance of cheatgrass. To our knowledge, only one management guideline identified by the IDFG was incorporated in the final decision—prohibiting sheep bedding on active sage-grouse leks during the breeding season. As demonstrated in the assessment. Livestock grazing has had a significant impact on vegetation resources within the Monument—Monument provides an opportunity to examine past grazing practices and evaluate new alternative grazing management strategies that address the needs of important wildlife resources and better fit the Monument.	This issue is dealt with under separate NEPA documents associated with the Laidlaw Park Grazing Plan.

Topic Grazing

Letter No./ Comment No.	Comment	Response
165 / 002	Restoration of native plant communities, protection ofsoils, and protection and restoration of sage grouse habitat have all been identified as objectives in this DEIS. Even though livestock grazing and its associated activities (road development, introduction of invasive species, plantings of non-native forage, habitat fragmentation due to fencing) have been consistently identified as impacts in the DEIS, no alternative provides BLM the tools to reduce the numbers and/or change the timing and movement of livestock within the Monument in order to meet the goals presented in this document. On page 52, the DEIS states that elimination of livestock was not considered in any of the alternatives because a "no grazing" alternative would not be consistent with the language in Proclamation 7373 (Federal Register, v.65 pp 69221). Nonetheless, the proclamation states that livestock grazing will continue to be managed in a way that is consistent with BLM regulations and policy. BLM policy and regulations certainly allow for removal and/or reduction of livestock to meet management objectives. The Service is specifically identifying grazing as a concern because a number of allotments within the Monument are not meeting standards at this time. The Service is not necessarily endorsing an alternative that proposes the elimination of livestock grazing, we are merely stating that as a document of disclosure and public review, the range of alternatives should include possible modifications to a land use (grazing) that can have profound impacts on the very resources the BLM and NPS have identified as priorities. We strongly recommend that an alternative be developed and considered that would provide the BLM with the tool of modifying livestock numbers and distribution, as necessary, to meet management objectives.	This Draft Plan/EIS has identified which lands are available and unavailable for livestock grazing (See page 117, Chapter 3 under Livestock Grazing). This fulfills BLM Land Use Planning Appendix C requirements for decisions pertaining to Livestock Grazing. The S&G process is the chosen method to address livestock stocking rates rather than across the board reductions or increases because it allows managers to assess each grazing allotment individually and determine if adjustments are needed in the allotment. None of the alternative mandate grazing to continue at existing levels. The Proclamation expanding the Monument states: “Laws, regulations, and policies followed by the BLM in issuing and administering grazing permits or leases on all lands under its jurisdiction shall continue to apply with regard to the lands in the Monument administered by the BLM.” Therefore a No Grazing alternative was not considered viable. The BLM does have flexibility to temporarily remove livestock to help achieve desired resource objectives.
128 / 003	This brings me to my most vehement point: establish a no-grazing area within Snowdrift Crater and covering the land to the Northeast of it to the lava. One fence should be constructed from the southeast side of Snowdrift Crater (by the "parking area") to the lava directly east; in addition, another short fence should be constructed from the north side of Snowdrift to the lava on the north. (Another possibility would be to fence an additional part of Little Laidlaw Park with a short fence at its narrowest point, and closing this land to livestock grazing. But that is not my proposal.) Only by eliminating of animals and Rlants be made. I can only conclude that you don't want to study the possibility of being wrong; that is no way to do science. Only by eliminating livestock grazing could	This would be considered in implementation level decisions.

Topic Grazing

Letter No./ Comment No.	Comment	Response
	the grasses, forbs, and sagebrush come back enough for sage grouse and other nearly-threatened animals and more common species to exist. In addition, the cover would allow more prey species to survive so that raptors, foxes, coyotes, raccoons, skunks, snakes, and other carnivores could occasionally catch pikas, rabbits, and squirrels while these prey can occasionally escape and reproduce. If the comparison for livestock gazing practices needs to be in an area with similar rainfall [which I doubt, as rainfall is virtually the same throughout the kipuka], BLM could also monitor Little Laidlaw Park as a comparison. Payment for the fence by Snowdrift Crater ought to be extracted from the abundant money out of the fire suppression funds. There are many ways that the money could be found in the Monument/Preserve.	
111 / 003	I refer BLM to its governing mandates in FLPMA. Section 202(c)(3) requires that BLM "give priority to the designation and protection of [ACECs]." Section 202(c)(6) directs the agency to "consider the relative scarcity of the values involved and the availability of alternative means. ..and sites for realization of those values." In any situation where the "values involved" include livestock production, roaded recreation opportunities, and preservation of healthy sagebrush communities, the latter must take precedence. There is simply no "scarcity" of either livestock pasture (private or public) or roaded recreation areas, and there exist many readily available alternative means for providing or producing these commodities elsewhere, at less risk to irreplaceable natural, publicly owned resources. Further, section 202(c)(7) requires weighing "long-term benefits to the public against short-term [private] benefits." The long-term benefits of sustaining healthy sagebrush communities vastly outweigh the minimal economic benefits that inure to those few persons permitted to graze livestock on these lands and the benefits of convenience or pleasure derived by road users.	Please refer to Appendix G of the Proposed Plan/FEIS. The ID team followed the appropriate process in analyzing the values in North Laidlaw Park to determine if the area qualified for ACEC status. The proposed ACEC was included and analyzed in Alternative C, the logical alternative to include the potential protection provided by the proposed ACEC. Further, to demonstrate a commitment to maintaining the high ecological condition of the area, protective measures were included in Alternative D, the preferred alternative, that limit livestock developments, specifically to maintain the light use that the area has received for years and that has resulted in the current condition (DEIS p. 49). Additional protective measures have been included in the Proposed Plan/FEIS, including decreasing the acreage of Passage Zone and increasing the acreage of Pristine Zone in Laidlaw Park. By comparing the effects of managing the area as an ACEC in Alternative C with the effects of managing the area with the protective measures in Alternative D we found no advantage in designating the area an ACEC and that we can achieve the same results with the protective measures in Alternative D. Therefore we concluded that it is unnecessary to designate the area as an ACEC.
88 / 003	Prepare a Supplemental EIS. This EIS must examine a broad range of alternatives including changes and reductions in livestock use necessary to limit weed spread, protect remaining sagebrush communities and wildlife habitat, and allow real restoration of tens of thousands of acres of cheatgrass and crested wheatgrass wastelands that currently exist inside the Monument. *** Conduct a science-based assessment of the suitability of these lands for grazing. ***	This EIS has identified which lands are available and unavailable for livestock grazing (See page 117, Chapter 3 under Livestock Grazing). This fulfills BLM Land Use Planning Appendix C requirements for decisions pertaining to Livestock Grazing. The S&G process is the chosen method to address livestock stocking rates rather than across the board reductions or increases because it allows managers to assess each grazing allotment individually and determine if adjustments are needed in the allotment. None of the alternative mandate grazing to continue at existing levels. The Proclamation expanding the Monument states: “Laws, regulations, and policies followed by the

Topic Grazing

Letter No./ Comment No.	Comment	Response
		BLM in issuing and administering grazing permits or leases on all lands under its jurisdiction shall continue to apply with regard to the lands in the Monument administered by the BLM." Therefore a No Grazing alternative was not considered viable. The BLM does have flexibility to temporarily remove livestock to help achieve desired resource objectives. BLM will continue to monitor and use all available data which could include utilization pattern mapping, trend data, and S&G allotment assessments to determine suitability for grazing.
102 / 003	Prepare a Supplemental EIS. This EIS must examine a broad range of alternatives including changes and reductions in livestock use necessary to limit weed spread, protect remaining sagebrush communities and wildlife habitat, and allow real restoration of tens of thousands of acres of cheatgrass and crested wheatgrass wastelands that currently exist inside the Monument. *** Conduct a science-based assessment of the suitability of these lands for grazing.	This EIS has identified which lands are available and unavailable for livestock grazing (See page 117, Chapter 3 under Livestock Grazing). This fulfills BLM Land Use Planning Appendix C requirements for decisions pertaining to Livestock Grazing. The S&G process is the chosen method to address livestock stocking rates rather than across the board reductions or increases because it allows managers to assess each grazing allotment individually and determine if adjustments are needed in the allotment. None of the alternative mandate grazing to continue at existing levels. The Proclamation expanding the Monument states: "Laws, regulations, and policies followed by the BLM in issuing and administering grazing permits or leases on all lands under its jurisdiction shall continue to apply with regard to the lands in the Monument administered by the BLM." Therefore a No Grazing alternative was not considered viable. The BLM does have flexibility to temporarily remove livestock to help achieve desired resource objectives. BLM will continue to monitor and use all available data which could include utilization pattern mapping, trend data, and S&G allotment assessments to determine suitability for grazing.
113 / 003	The preferred alternative states "to protect vegetation resources, no new livestock developments would be permitted in North Laidlaw Park pasture and Bowl Crater allotment". This Association does not agree with this management directive. A new well needs to drilled in North Laidlaw Park which would not only be of benefit to livestock permittes but to the wildlife in this area as well. As stated above, the plan needs to be flexible. There may be a time when a specific livestock improvement (either permanent or temporary) is needed for the benefit of not only the livestock grazing operation but for the overall betterment of the area as well. Keep that flexibility.	The high ecological condition of North Laidlaw Park has been maintained with light livestock use, primarily due limited water developments in that area. The ID Team felt that restriction of water developments in North Laidlaw Park would be the most effective way to maintain the existing light livestock use in that area at this level of planning.

Topic Grazing

Letter No./ Comment No.	Comment	Response
123 / 003	Characterized by bunchgrasses, forbs and shrubs with soil interspaces of microbiotic crusts, the sagebrush ecosystem did not evolve with herds of large, hoofed ungulates (Mack and Thompson 1982). The current vegetation originated in the Pleistocene, with little grazing by large native herbivores, and bison scarce in the intermountain region. “The vegetation of the pristine sagebrush/grasslands was relatively simple and extraordinarily susceptible to disturbance ... the native vegetation lacked the resilience, depth, and plasticity to cope with concentrations of large herbivores. The plant communities did not bend to adapt; they shattered. This tends to make the review of grazing in the sagebrush/grasslands a horror story, resplendent with examples of what should not have been done ” (Young and Sparks 1985 in Young 1994). Native bunchgrasses are weakened and killed by the chronic effects of livestock grazing. Microbiotic crusts that fix nitrogen, protect against erosion and help exclude weeds are destroyed by trampling. Alien annual cheatgrass and other weeds invade depleted understories and clog the now bare interspaces. Cheatgrass produces continuous fine fuels so fires flash across the landscape. Larger areas burn more frequently and uniformly, and few unburned patches remain. This phenomenon accelerates, with conversion to annual grassland the end result. As remaining habitat patches become smaller, species disappear. As fires become larger, more uniform and more frequent, the landscape changes from a species-rich matrix to a species-poor matrix dominated by exotic, annual species (Whisenant 1991). Plant communities set on this trajectory with repeated disturbance cross thresholds from which they can not recover, and restoration is not possible (Knick et al. 2003). In contrast to uplands, most riparian systems will exhibit recovery following livestock removal. Highest elevation sagebrush communities are more resilient than lower elevation communities. Unfortunately, cheatgrass and other weeds are now evolving to grow at higher elevations. “The end results could be the conversion of these native ecosystems to unproductive and simplistic annual grasslands lacking not only native vertebrates but also those invertebrates involved in the operation of the ecosystem including energy flow, water cycling and nutrient balance”. (Billings 1994). The horror story continues to this day in the Monument, with livestock disturbing soil surfaces, and nipping bunchgrasses to levels far too low. Weeds invade, and	The decline of the sagebrush steppe in the western United States is acknowledged in the DEIS (pp. 86-98, Affected Environment, Vegetation, Including Special Status Species, and Fire Management).

Topic Grazing

Letter No./ Comment No.	Comment	Response
	livestock act as their vectors of dispersal, transporting weeds in fur, mud, and dung (Belsky and Gelbard 2000). Fragmentation proceeds at multiple levels – while a veneer of sagebrush may remain, livestock may have removed or simplified critical habitat components. For example, sagebrush broken and battered by livestock converging on water loses the structural complexity required by the pygmy rabbit.	
95 / 004	problem. To achieve any permanent positive results, I believe that there should be a science-based assessment of the suitability of these lands for grazing before any management plan is put into place, rather than starting with the objective of keeping current grazing practices as they are currently.	BLM will continue to monitor and use all available data which could include utilization pattern mapping, trend data, and S&G allotment assessments to determine suitability for grazing. This EIS has identified which lands are available and unavailable for livestock grazing (See page 117, Chapter 3 under Livestock Grazing). This fulfills BLM Land Use Planning Appendix C requirements for decisions pertaining to Livestock Grazing. The S&G process is the chosen method to address livestock stocking rates rather than across the board reductions or increases because it allows managers to assess each grazing allotment individually and determine if adjustments are needed in the allotment. None of the alternative mandate grazing to continue at existing levels. The Proclamation expanding the Monument states: "Laws, regulations, and policies followed by the BLM in issuing and administering grazing permits or leases on all lands under its jurisdiction shall continue to apply with regard to the lands in the Monument administered by the BLM." Therefore a No Grazing alternative was not considered viable. The BLM does have flexibility to temporarily remove livestock to help achieve desired resource objectives.
89 / 004	Prepare a Supplemental EIS. This EIS must examine a broad range of alternatives including changes and reductions in livestock use necessary to limit weed spread, protect remaining sagebrush communities and wildlife habitat, and allow real restoration of tens of thousands of acres of cheatgrass and crested wheatgrass wastelands that currently exist inside the Monument. Conduct a science-based assessment of the suitability of these lands for grazing.	Same response as previous comment.

Topic Grazing

Letter No./ Comment No.	Comment	Response
111 / 004	In sum, I urge the agencies to revise the DEIS or prepare a supplemental EIS, which considers an acceptable range of reasonable alternatives, including reducing or eliminating livestock use as necessary to protect existing sagebrush communities, and measures to begin the long process of restoring areas now dominated by cheatgrass, crested wheatgrass, and other nonnative plants. Before livestock grazing is authorized on any Monument/Preserve lands, their suitability for grazing must be assessed. This assessment must employ accepted ecological measures.	This EIS has identified which lands are available and unavailable for livestock grazing (See page 117, Chapter 3 under Livestock Grazing). This fulfills BLM Land Use Planning Appendix C requirements for decisions pertaining to Livestock Grazing. The S&G process is the chosen method to address livestock stocking rates rather than across the board reductions or increases because it allows managers to assess each grazing allotment individually and determine if adjustments are needed in the allotment. None of the alternative mandate grazing to continue at existing levels. The Proclamation expanding the Monument states: "Laws, regulations, and policies followed by the BLM in issuing and administering grazing permits or leases on all lands under its jurisdiction shall continue to apply with regard to the lands in the Monument administered by the BLM." Therefore a No Grazing alternative was not considered viable. The BLM does have flexibility to temporarily remove livestock to help achieve desired resource objectives.
113 / 004	A key factor in the proper management of a livestock operation is accessibility to the in regards to road closures should be part of the plan.	On page 116 of the Travel and Access section states that "Proclamation 7373 prohibits all motorized and mechanized vehicle use off road except for emergency or authorized administrative purposes. Administrative purposes include permit holders (e.g., livestock permitees).
82 / 005	Prepare a Supplemental EIS. This EIS must examine a broad range of alternatives including changes and reductions in livestock use necessary to limit weed spread, protect remaining sagebrush communities and wildlife habitat, and allow real restoration of tens of thousands of acres of cheatgrass and crested wheatgrass wastelands that currently exist inside the Monument. Conduct a science-based assessment of the suitability of these lands for grazing.	BLM will continue to monitor and use all available data which could include utilization pattern mapping, trend data, and S&G allotment assessments to determine suitability for grazing. This EIS has identified which lands are available and unavailable for livestock grazing (See page 117, Chapter 3 under Livestock Grazing). This fulfills BLM Land Use Planning Appendix C requirements for decisions pertaining to Livestock Grazing. The S&G process is the chosen method to address livestock stocking rates rather than across the board reductions or increases because it allows managers to assess each grazing allotment individually and determine if adjustments are needed in the allotment. None of the alternative mandate grazing to continue at existing levels. The Proclamation expanding the Monument states: "Laws, regulations, and policies followed by the BLM in issuing and administering grazing permits or leases on all lands under its jurisdiction shall continue to apply with regard to the lands in the Monument administered by the BLM." Therefore a No Grazing alternative was not considered viable. The BLM does have flexibility to temporarily remove livestock to help achieve desired resource objectives.

Topic Grazing

Letter No./ Comment No.	Comment	Response
159 / 006	Prepare a Supplemental EIS. This EIS must examine a broad range of alternatives including changes and reductions in livestock use necessary to limit weed spread, protect remaining sagebrush communities and wildlife habitat, and allow real restoration of tens of thousands of acres of cheatgrass and crested wheatgrass wastelands that currently exist inside the Monument. Conduct a science-based assessment of the suitability of these lands for grazing.	See response to previous comment.
106 / 006	One of the stated purposes for the expansion of the Monument was to benefit greater sage grouse, which are currently being considered for listing under the ESA. On page 169 of the DMP/EIS it states that in the Laidlaw Park area there are 79 known grouse leks with only 184 birds when last surveyed. Of these 79 leks, only 29, or 37% were active. I submit to you that such a low number of active leks with relatively few birds is already a sign of a population that is in trouble. I think this calls for drastic action, such as removing cattle and sheep grazing in the entire area. Grouse require sage and grasslands in a healthy mixture, as the DMP/EIS noted, but they also require native succulent forbs, especially in the spring when the females have to lay eggs. They can't lay eggs on a sage diet alone, and there are few insects available in April. Domestic livestock preferentially remove these plants, and are thus in direct competition with grouse at this critical season. Since when does the NPS allow commercial alien grazers on their lands? I feel that the DMP/EIS should accept Alternative C as the preferred alternative and use the nearly half-million dollar ($446,000/year) difference between it and Alternative D to buyout grazing allotments and private in-holdings in these areas critical for sage grouse.	Current federal regulations prevent buyouts of grazing allotments.
129 / 006	While livestock may impact resources, the impacts portrayed in the "Unavoidable Adverse Impacts" section (pg239) unnecessarily concentrate on those associated with livestock. The "damage, theft, vandalism, foot-traffic, and other caused disturbances" associated with geologic resources also impact many other facets of the Monument that are currently only attributed to livestock. Cultural resources are a prime example of finite resources damaged more extensively by direct human activity (theft or vandalism) than by livestock. ISDA strongly suggests that the team make a complete assessment of current and potential impacts to these resources by direct human activity in addition to those caused by livestock.	The unavoidable adverse impacts of theft and vandalism have been mentioned for Alternative B on p. 241 because of the intensity of recreational use expected under that alternative. The impacts of theft and vandalism were deemed to be of lesser intensity under Alternatives A, C and D comparatively, but the DEIS does assess the impacts of theft and vandalism to cultural resources under all alternatives on pages 188-193. On page 239 of the DEIS, adverse impacts have been analyzed and are attributed to humans as well as to livestock: for example, “Damage, theft, vandalism, foot traffic, and other human-caused disturbances to geologic resources…”

Topic Grazing

Letter No./ Comment No.	Comment	Response
122 / 006	There is solid scientific evidence, developed by the U.S. Sheep Experiment Station in Dubois, Idaho, that carefully implemented fall sheep grazing can be a useful tool for restoring forb and grass levels in sagebrush steppe. The University of Idaho currently is developing weed control programs using sheep and goats. We urge NPS/BLM to carefully and thoroughly assess the feasibility of using sheep as a management tool for achieving restoration of sagebrush steppe where appropriate.	The targeted use of livestock as a cultural or biological tool for noxious weed control is recognized under the Proposed Plan/FEIS as a viable option within a fully implemented Integrated Weed Management Program. See FEIS Chapter 2, Management Actions Common To All Alternatives: Vegetation, Including Special Status Species, and Fire Management.
128 / 007	Please consider assessment of plant types and seed production, plant growth, seedling survival in hard soils, and percent bare ground in your grazing assessments relative to soil types, climate, and landforms. Please also write into your grazing Guidelines a condition that habitat for endangered or threatened species must be improved. Similarly, please apply management practices that 12romote habitat for physical and biological conditions to sustain native plant populations and wildlife habitats in plant communities. In places dominated by non-native plants and grasses, turn these lands into having native plants and grasses; again reduce grazing and then seed the areas with native seeds. Please stand by your Guidelines # 6 and #7 that you haven't in the past. Always maintain better than viable numbers of T&E species within the Monument.	Thank you for your comment.
129 / 007	While it is true that removal of exposed lava flows will not appreciably reduce the available forage base for grazing permits, care should be taken to ensure that only those lands of truly exposed lava are removed from the grazing permits. ISDA supports the recommended adjustments to the boundary and jurisdictional changes proposed within Appendix C.	The planning team has been working with those permittees affected by the boundary adjustments to make the transition accurate and appropriate.

Topic Grazing

Letter No./ Comment No.	Comment	Response
122 / 007	NPS/BLM must adopt an alternative that permits continued livestock grazing in BLM-managed portions of the Monument. As an active and direct participant in the field meetings that occurred with Secretary Babbitt preceding the proclamation that led to the Monument's expansion, Lava Lake firmly believes that it was fully and clearly within the intent of the Proclamation that livestock grazing be continued within the Monument consistent with the regulations governing BLM. Efforts to use language in the Proclamation to advocate for wholesale removal of all livestock grazing from the Monument are inconsistent with the intent and the letter of the Proclamation and undermine the collaborative spirit that supported the Clinton Administration's efforts to bring greater levels of protection to this remarkable area. We believe that sheep grazing can be compatible with the preservation and restoration of the primitive nature of the Monument and the improvement of their ecological condition. Clearly, sheep grazing levels have to be set at a level supported by up-to-date field assessments and evaluated through quantitative field monitoring. BLM's proposed grazing decision for Laidlaw Park Allotment is currently under appeal but that decision will obviously need to be integrated with the final management plan for the Monument. While Lava Lake has commented extensively on the BLM's standards and guidelines process and the proposed and final grazing decisions for Laidlaw Park, several points merit emphasis in these comments. First, Lava Lake supports a grazing program that takes place in the context of the restoration of native plant communities in Laidlaw Park and which does not significantly detract from the primitive character of the Monument. Second, we also have consistently advocated for the implementation of a quantitative monitoring program that will allow BLM and permittees to objectively and accurately evaluate year-to-year impacts of sheep grazing. Finally, we continue to be concerned about the artificial constraints imposed by current fencing in Laidlaw Park on sheep grazing patterns and the rest-rotation program proposed by BLM. We believe that the fences reduce our collective ability to implement a sound grazing strategy, create artificial and unnecessary trailing and grazing bottlenecks, impede wildlife movements, and detract from the primitive character of Laidlaw Park. Lava Lake supports the removal, over a period of time, of the fencing in Laidlaw Park and promotes the reliance on active or abandoned roads to delineate pasture boundaries and guide livestock movements. There is no	Thank you for your comment. This will be considered in the appropriate implementation-level plans.

Topic Grazing

Letter No./ Comment No.	Comment	Response
	doubt that this approach will greatly facilitate a common sense approach to restoration, will minimize livestock impacts and will allow for efficient grazing patterns.	
128 / 008	Identifying 36,963 AUMs in table 15 (and particularly the 11,431 AUMs in Laidlaw Park allotment) of the EIS is absolutely absurd! This fails to consider potential future decreases in use (voluntary or mandatory), seasonal drought, closures for fire management, or other management prescriptions and unforeseen consequences. This sort of figure should only be set in site-specific documents, if there. They are precise and specific in contrast to virtually all other directions in a programmatic land use plan like this one. Delete this specific information which could be taken for accurate by ranchers and BLM, which, of course, you wouldn't want. They should be mentioned in the Future Planning Needs portion of the plan. It is notable that the 11,431 AMUs in Laidlaw Park Allotment fail to meet standards.	See Table 20 and revised Livestock Grazing text in Chapter 3, Proposed Plan/FEIS.
129 / 008	The nominated Laidlaw Park ACEC, as shown in Appendix G, is not appropriate. The BLM has Standards for Rangeland Health and Guidelines for Livestock Management that provide for the attainment of rangeland health while still providing for utilization to benefit the operations of local ranchers. The designation of this area calls for additional protection that is not necessary and would limit the availability of many management tools currently used by resource managers and users.	The proposed ACEC is included in Alternative C. It is not proposed in the Preferred Alternative at this time. Thank you for your comment.
123 / 009	For example, an Alternative that terminates livestock grazing across remaining sagebrush habitats in Laidlaw Park (where there is still some hope of keeping the land from turning into a complete Weed Hell), while allowing some grazing to continue in the cheatgrass-infested southern areas, should be assessed as part of a reasonable alternatives range. It would protect the significant values of the Monument. Another example is development of an alternative that addresses the role of livestock in the infestation and spread of weeds as well as alteration of fire cycles.	Thank you for your comment. We will consider these points in the appropriate implementation- and project-level plans.

Topic Grazing

Letter No./ Comment No.	Comment	Response
165 / 010	Page 49 -Alternative D; Vegetation; Management Actions, 2nd bullet: It is unclear how active restoration/rehabilitation of 80,000 acres of annual grassland and low elevation sagebrush steppe will impact use of livestock allotments in those areas being treated. Livestock allotted to areas being treated by fire and other mechanisms (mechanical, chemical) will need to go elsewhere in many cases. The Service recommends that the final document disclose the destination of displaced livestock, what success criteria will need to be met before they can be placed back on the treated allotment, whether or not other BLM allotments will be used to support the displaced livestock, or what contingency plans will be in place if the treated areas do not meet success criteria within the predicted time frame. These nuances are very important when assessing the utility of an action or an alternative that calls for a particular prescription.	Livestock management following restoration treatment and other specific project-level resource management issues and objectives, including criteria for success or treatment, are addressed in project-level environmental assessments.
165 / 010	Page 46 -Alternative C; We suggest that "no new livestock developments in the proposed Laidlaw Park ACEC" may be too restrictive. If this alternative were chosen and the BLM subsequently finds that moving livestock facilities to a new location within the proposed ACEC would be beneficial to wildlife and native plant communities, they would be unable proceed because of this restriction. If the absolute number of developments in the proposed ACEC is the issue, we recommend that the statement read "no net increase of livestock developments or the acreage they impact and no new developments unless it results in a net benefit to those resources identified as needing improvement or protection." This would allow moving fence and water developments to new locations if it resulted in a net gain in overall plant community health in Laidlaw Park.	Thank you for your comment. The recommended change has been made to the text.
123 / 011	As grazing permit retirement is a very foreseeable during the life of this plan, this plan should examine and authorize it.	Appendix F in the Proposed Plan/FEIS, addresses livestock administration adjustments, which includes suspending a permit for resource benefit.

Topic Grazing

Letter No./ Comment No.	Comment	Response
123 / 012	Analysis of the current ecological condition of the land and the impacts of livestock grazing is absent. Plus, the effects of the various alternatives on extending livestock grazing are not analyzed. A Supplemental EIS must be prepared to address these many deficiencies. Passive restoration, as described in Appendix A of our comments, must be incorporated as part of all action alternatives.	This EIS has identified which lands are available and unavailable for livestock grazing (See page 117, Chapter 3 under Livestock Grazing). This fulfills BLM Land Use Planning Appendix C requirements for decisions pertaining to Livestock Grazing. The S&G process is the chosen method to address livestock stocking rates rather than across the board reductions or increases because it allows managers to assess each grazing allotment individually and determine if adjustments are needed in the allotment. None of the alternative mandate grazing to continue at existing levels. The Proclamation expanding the Monument states: "Laws, regulations, and policies followed by the BLM in issuing and administering grazing permits or leases on all lands under its jurisdiction shall continue to apply with regard to the lands in the Monument administered by the BLM." Therefore a No Grazing alternative was not considered viable. The BLM does have flexibility to temporarily remove livestock to help achieve desired resource objectives.
123 / 013	The DEIS presents information on livestock stocking rates (as in Table 15, DEIS at 119) that has no relation to the much-reduced actual use that now occurs under depleted vegetation conditions. It provides no data on actual use, changes with drought, high utilization levels, weed infestations associated with livestock projects, etc. Such information is necessary to provide a foundation and historical context so that the levels and impacts of public lands ranching and its implications to Monument resources and values can be understood. The DEIS team cannot cast this off onto future allotment-level decisions. That would result in no foundation for livestock management being laid out in the EIS, as well as no current inventory of livestock-related activities and impacts on these lands. It would also mean that analysis of indirect, cumulative and synergistic impacts analyses of livestock grazing would be deficient.	Actual Use information was not individually summarized by allotment in this DEIS primarily because there are only four allotments which are completely within the Monument boundary. If actual use information was extrapolated for all allotments it would only be an estimate based on the percent of each allotment within the Monument boundary and may or may not accurately reflect the amount of use which has actually occurred. Actual use can be accurately figured for those four allotments which have 100% of the acres within the Monument boundary. This information is available at the Shoshone and Idaho Falls Field Offices.

Topic Grazing

Letter No./ Comment No.	Comment	Response
70 / 014	Grazing discussions in the entire plan seem to focus on the impact of the plan on grazing and not the impact of grazing on the land. Considering that grazing is recognized as the largest major disturbance historically leading to soil disturbance, plant diversity loss and the consequent introduction of weeds and subsequent fire regime changes, it would be appropriate to have a discussion of that historical impact. If monitoring shows that grazing is impacting the restoration process, removal needs to be a legitimate response.	If monitoring shows that grazing is impacting the restoration process, temporary removal of livestock is a legitimate response to correct the problem. According to policy requirements, restoration projects always include removal of livestock for a minimum of two growing seasons following treatment to allow for vegetation recovery and establishment of seeded species. Idaho Standards and Guidelines for Rangeland Health guide adjustments in livestock grazing regimes (numbers, season of use) in response to problems identified through evaluation and monitoring. The historical impacts of livestock grazing on the sagebrush steppe were discussed in the DEIS (p. 86, Affected Environment: Vegetation, including Special Status Species, and Fire Management).
104 / 014	Grazing discussions in the entire plan seem to focus on the impact of the plan on grazing and not the impact of grazing on the land. Considering that grazing is recognized as the largest major disturbance historically leading to soil disturbance, plant diversity loss and the consequent introduction of weeds and subsequent fire regime changes, it would be appropriate to have a discussion of the historical impact. Suggesting that it would only result in some "negligible to minor adverse impacts" seems to ignore the devastating affect grazing has had on western landscapes. The conclusions seem to acknowledge the potential for major impacts by noting, "effects on the natural soundscape would result mainly from transportation, administrative uses, and grazing" (P. 235).	Impacts associated with livestock grazing are described throughout the Environmental Consequences chapter of the DEIS, and include impacts to soils, vegetation, water, wildlife, and livestock grazing.
165 / 014	Several allotments, including the proposed ACEC in Laidlaw Park, are not meeting rangeland health standards. All of the alternatives, including Alternative D, do not provide the tool of reducing or eliminating livestock grazing, whether temporary or permanent, in areas not attaining standards.	This EIS has identified which lands are available and unavailable for livestock grazing (See page 117, Chapter 3 under Livestock Grazing). This fulfills BLM Land Use Planning Appendix C requirements for decisions pertaining to Livestock Grazing. The S&G process is the chosen method to address livestock stocking rates rather than across the board reductions or increases because it allows managers to assess each grazing allotment individually and determine if adjustments are needed in the allotment. None of the alternative mandate grazing to continue at existing levels. The Proclamation expanding the Monument states: "Laws, regulations, and policies followed by the BLM in issuing and administering grazing permits or leases on all lands under its jurisdiction shall continue to apply with regard to the lands in the Monument administered by the BLM." Therefore a No Grazing alternative was not considered viable. The BLM does have flexibility to temporarily remove livestock to help achieve desired resource objectives.

Topic Grazing

Letter No./ Comment No.	Comment	Response
123 / 014	The DEIS fails to lay out the link between livestock and the proliferation of roads. The primary cause of the large network of roads that penetrate so much of the non-lava land (and even some of the lava land!) in the Monument is activities associated with public lands ranching, and/or attempts to patch the damage done by grazing. As part of this EIS process, you must address livestock-ranching activity related roading. As part of this, examine the purpose of the road, road redundancy, etc. The DEIS, for example, does not even address practices like parking sheep wagons in inappropriate locations.	Table 1 is Management Zone descriptions on page 23; Common to All description of Livestock Grazing on page 29, and the Access and Travel section of the Affected Environment on page 116 all discuss some of the access and developments associated with livestock grazing. The implementation level Travel and Access plan would further address the purpose of roads, road redundancy and correlated livestock grazing interactions.
70 / 015	In light of the above, the plan needs to justify the conclusion on P. 157 that, "Grazing and associated trailing would result in the same negligible to minor adverse impacts described for the other alternatives, since grazing would not be managed any differently." Grazing has had and will have a major impact on the landscape. P. 235: The conclusion: "effects on the natural soundscape would result mainly from transportation, administrative uses, and grazing," indicates that grazing would be a major source of impact and conflicts with the note above.	Livestock impacts to geologic resources are considered negligible to minor because (1) livestock trailing generally occurs along existing improved roads, (2) historic uses have not proven to be a major impact to geologic resources, and (3) livestock use and trailing is not expected to increase. The conclusion on page 235 of the DEIS refers to impacts to soundscapes from livestock operations as well as vehicle and fire management operations. The two impacts are addressed separately.
104 / 015	Additionally, the plan should justify the conclusion that the impacts associated with grazing would be the same as those associated with any other impact because they are managed differently. It seems likely that expansion of the Passage Zone would affect trailing of livestock and thus have an impact on surrounding areas. The plan acknowledges the likelihood of different impacts (or the intensity of those impacts) by noting on page 70, "…and expanded Passage Zone…would result in minor to moderate beneficial effects from increased access and more ability to create new facilities. The Pristine Zone could restrict or increase the costs associated with grazing, a moderate adverse impact." This implies that increasing the Passage Zone or Pristine Zone would have a direct effect on grazing. Thus the impacts expected from each alternative should be analyzed accordingly.	See page 205-209 of the DEIS for a more detailed description of the environmental consequences pertaining to livestock grazing.
123 / 015	The DEIS also fails to identify the link between livestock grazing disturbance and weed infestation and spread. As a result, actions necessary to control weed spread by livestock are lacking from the DEIS. For example, there are no provisions to cleanse/purge livestock of weed seeds before moving into the lands of the Monument. Under all alternatives, livestock should be quarantined for the period of time necessary to cleanse systems of weeds	The DEIS acknowledges that roads, vehicles, humans, and animals are known vectors to the spread of noxious weeds (Ch. 3, Discussion on Noxious and Exotic Species, p. 92). A full Integrated Weed Management Program addresses a broad range of prevention, education, and control activities to combat noxious weeds (see DEIS p. 25, Management Guidelines Common To All Alternatives: Vegetation, Including Special Status Species, and Fire Management).

Topic Grazing

Letter No./ Comment No.	Comment	Response
	consumed, cleaned of mud or burs/seeds in fur before being transported onto the Monument.	
70 / 016	This section acknowledges the role neighboring agriculture contributes to the littering and deposits of solid waste in remote areas, but I do not see any management action notes on reduction and removal. We need a waste reduction and removal action note.	This is an implementation level comment. The Craters of the Moon National Monument and Preserve has historically and will continue to promote waste removal projects.
104 / 016	The two livestock trails that do not follow designated roads and cross lava flows should be addressed under the plan. Information should be provided regarding the previous and future impact of these operations. This information is relevant considering the plan is aimed at restoring natural resources and grazing can have significant negative impacts.	The primary impacts from livestock trailing typically affect soil and vegetation. These impacts have been discussed in the Environmental Consequences chapter of the DEIS. Historic impacts to resources are discussed in the Affected Environment chapter of the DEIS. Trailing on existing roads minimizes impacts. Trailing off the designated roads increases impacts caused from repeated hoof alterations to soil, vegetation, and rocks. This can leave visible ruts on the landscape.
123 / 016	Livestock grazing affects and/or degrades all componentslisted under the “”Purpose and Significance” of the Monument (DEIS at 6-7). Components include: Safeguard volcanic features, scientific, educational and interpretive activities, maintain wilderness character, perpetuate scenic vistas, protect kipukas. Laidlaw Park is the world’s largest kipuka, and it is NOT protected under the Preferred or other Alternatives.	The DEIS does place restrictions on livestock grazing to protect natural resources. Examples of restrictions include excluding livestock from areas, identifying areas available and not available to grazing, allotment management plan conformance with the new Plan, allotment boundary adjustments, allotment conformance with Idaho Standards for rangeland Health and Guidelines for Livestock Grazing Management which requires all allotment to be meeting or making significant progress towards meeting applicable standards. Some specific protections to natural resource conditions are included in the Management Guidance Common to All Alternatives Livestock Grazing section, and the Summary of Alternatives in table 7. Alternative C specifically prohibits new livestock facilities in the north pasture of Laidlaw Park.
123 / 018	Neither the confusion of old, out-dated Land Use Plans listed in DEIS at 11, or the DEIS, provides no modern-day inventory of any kind or current-day analysis of grazing and roading. Thus, it is critical that a SEIS be developed to do this. As written, the Alternatives provide no concrete guidance - including goals, objectives and management actions for livestock activity plans (such as the Laidlaw Park livestock grazing decision).	This EIS has identified which lands are available and unavailable for livestock grazing (See page 117, Chapter 3 under Livestock Grazing). This fulfills BLM Land Use Planning Appendix C requirements for decisions pertaining to Livestock Grazing. The S&G process is the chosen method to address livestock stocking rates rather than across the board reductions or increases because it allows managers to assess each grazing allotment individually and determine if adjustments are needed in the allotment. None of the alternative mandate grazing to continue at existing levels. The Proclamation expanding the Monument states: “Laws, regulations, and policies followed by the BLM in issuing and administering grazing permits or leases on all lands under its jurisdiction shall continue to apply with regard to the lands in the Monument administered by the BLM.” Therefore a No Grazing alternative

Topic Grazing

Letter No./ Comment No.	Comment	Response
		was not considered viable. The BLM does have flexibility to temporarily remove livestock to help achieve desired resource objectives.
123 / 021	While the DEIS describes "increased risks" in relation to other uses (fire, safety, etc.), there are many "risks" associated with livestock grazing, especially the overlapping sheep and cattle grazing conducted on many areas of the Monument. Risks include cheatgrass invasion, weed invasion, diseases such as Q fever, water-borne pathogens, etc. that affect public uses and safety.	The DEIS acknowledges that roads, vehicles, humans, and animals are known vectors to the spread of noxious weeds (Ch. 3 Discussion on Noxious and Exotic species, p. 92). A full Integrated Weed Management Program addresses a broad range of prevention, education and control activities to combat noxious weeds (See DEIS p. 25, Management Actions Common to All Alternatives: Vegetation Including Special Status Species and Fire Management). The danger of Q fever is considered to be very minimal on rangeland in Idaho. There are only four known cases of Q fever recorded in Idaho since 1990. The risk on public lands to the users is very limited, since Q fever have been directly correlated to occupational exposure involving veterinarians, meat processing plant workers, sheep and dairy workers, livestock farmers and researchers at facilities housing sheep. The important fact of the Q fever bacteria is that during the birthing, the organisms are shed in high numbers within the amniotic fluids and placenta, birthing generally occurs on private lands.
165 / 022	Page 71- Special Designation Areas: Under Alternatives C and D, it is stated that livestock impacts "could be moderate in some local areas where livestock concentrate". This statement is inaccurate. The DEIS identifies Laidlaw Park as being an area where grazing standards are not being met (DEIS Page 120). This conveys more than a "moderate impact" and if monitoring is being done correctly, the failure to meet standards is indicative of the whole allotment and not just "where livestock concentrate".	Please read the Environmental Consequences section on page 213-217 of the DEIS for a more detailed definition of the methodology and assumptions.
123 / 022	14. Photo caption is not ATV use – but pickup tracks. Many hills across SW Idaho have tracks just like this –associated with the parking of sheep camps parked without control nearly anywhere across the landscape. Please review letters of 2002-3 on the Bennett Hills sheep wagons and knapweed infestations, cross-country driving of water haul trucks, etc. We have walked sheep camp-road after sheep camp road in the Bennett Hills, and found knapweed associated with every one, and sheep water haul trucks driving crosscountry, including in WSAs.	Photo caption has been changed.
165 / 023	Page 73- Visitor Experience; Recreation and Public Safety; All Alternatives: It is unclear how ongoing livestock operations can result in "long-term negligible to minor beneficial effects". The	Please read the Environmental Consequences section on page 222 of the DEIS for a more detailed definition of the methodology and assumptions.

Topic Grazing

Letter No./ Comment No.	Comment	Response
	document does not describe how livestock grazing can be beneficial to recreation and public safety, it merely states it. We recommend thy final document provide the information to support this statement.	
123 / 023	While the DEIS asks if there will be new guidelines for weed, grasshopper and other management, it fails to ask, "will there be new guidelines for livestock grazing?" Likewise, Visitor Experience.	This EIS has identified which lands are available and unavailable for livestock grazing (See page 117, Chapter 3 under Livestock Grazing). This fulfills BLM Land Use Planning Appendix C requirements for decisions pertaining to Livestock Grazing. The S&G process is the chosen method to address livestock stocking rates rather than across the board reductions or increases because it allows managers to assess each grazing allotment individually and determine if adjustments are needed in the allotment. None of the alternative mandate grazing to continue at existing levels. The Proclamation expanding the Monument states: "Laws, regulations, and policies followed by the BLM in issuing and administering grazing permits or leases on all lands under its jurisdiction shall continue to apply with regard to the lands in the Monument administered by the BLM." Therefore a No Grazing alternative was not considered viable. The BLM does have flexibility to temporarily remove livestock to help achieve desired resource objectives.
165 / 024	Page 120-Affected Environment; Livestock Grazing: Itis stated that grazing preference is not expected to change because most allotments are attaining or making progress toward uniform achievement. Table 16 indicates otherwise. Standards and guidelines have been applied to 14 of the 23 allotments. Table 16 indicates that standards were not meant for 5 out of the 13 allotments or, one out of three allotments is not meeting standards. In addition, the allotments that are not meeting standards (376,000 acres) contain 40,000 more acres than those meeting standards (336,000 acres). The Service recommends that the final document address whether the allotments not meeting standards were in areas important of sage grouse, pygmy rabbits, and neo-tropical migrants. We also recommend that, if grazing preference is not expected to change, the rationale for this decision be described.	There are changes other than AUM adjustments which would promote meeting standards. The number of AUMs in the table (Table 21 in the Proposed Plan/FEIS) may reflect adjustments.

Topic Grazing

Letter No./ Comment No.	Comment	Response
123 / 027	Why is there no discussion of "carrying capacity" or suitability for livestock, and "limits of acceptable change" as they relate to Livestock?	This EIS has identified which lands are available and unavailable for livestock grazing (See page 117, Chapter 3 under Livestock Grazing). This fulfills BLM Land Use Planning Appendix C requirements for decisions pertaining to Livestock Grazing. The S&G process is the chosen method to address livestock stocking rates rather than across the board reductions or increases because it allows managers to assess each grazing allotment individually and determine if adjustments are needed in the allotment. None of the alternative mandate grazing to continue at existing levels. The Proclamation expanding the Monument states: "Laws, regulations, and policies followed by the BLM in issuing and administering grazing permits or leases on all lands under its jurisdiction shall continue to apply with regard to the lands in the Monument administered by the BLM." Therefore a No Grazing alternative was not considered viable. The BLM does have flexibility to temporarily remove livestock to help achieve desired resource objectives.
123 / 028	DEIS at 21 states that "each separate zone has distinct settings to be provided and maintained", and "physical settings consider the degree of naturalness and amount and type of facilities …". Yet, the DEIS has provided no map of livestock facilities, sheep bed sites, water haul sites and other facilities that would allow it to determine these zones, or the visual qualities associated with them. Livestock facilities and disturbance affect visual quality, ecological integrity and visitor use and enjoyment. It appears that BLM is allowing the location of livestock facilities to be a primary influence on how it defines zones. Is that the case? Please describe how you have taken this into account? "Passage" Zone has "high" degree of livestock encounters and maintained roads, primitive has "medium" degree of livestock encounters and 2-track or high clearance roads. Pristine has a "low"? Yet, you have failed to provide maps that show the location of projects. Aren't there currently livestock projects and zones of livestock concentration in the Primitive Zone. Does this mean that you plant to shift cattle out of the Primitive Zone into the passage zone? With livestock grazing, sheep wagons, salt lick or mineral site placement, sheep bedding wastelands, etc. how can lands be considered "pristine"?	Please see Figure 18 in the Proposed Plan/FEIS.

Topic Grazing

Letter No./ Comment No.	Comment	Response
123 / 031	DEIS vegetation goals common to all alternatives are protecting existing sagebrush steppe communities, restoring degraded areas, post-fire rehab, sagebrush management. If that is the case, current on livestock impacts and the role of livestock in retarding attainment of these goals must be fully assessed.	The ID Team felt that the level of detail regarding soils data was adequate to make informed decisions at the RMP/GMP level of analysis. Additional information found in the NRCS Soil Surveys will be used for implementation- and project-level planning.
123 / 035	Where are the 5000 acres of BLM land NOT available for livestock use? The DEIS provides no guidance for the S&G Determinations. The EIS should provide for removal of livestock facilities in Primitive and Pristine Zones, and any locations where they are causing harm to soils, waters, vegetation, leading to weed increases/invasion, fragmenting/altering wildlife habitats, etc.	The Livestock Grazing section of the Affected Environment on page 117 describes the lands not available to grazing as "…acres of BLM administered land adjacent to privately owned agriculture fields and NPS -administered lava, which are not within a grazing allotment." Generally these areas are southeast of Cary and on the east side of Wapi flow. Guidance for S & G determinations are on page 120 and Appendix F of the DEIS. For improved accuracy and in response to public comments, revisions to GIS data, analysis and calculations have been made resulting in changes to the ACEC figures between the DEIS and the Proposed Plan/FEIS. Specifically, there are 1,800 acres of BLM-administered lands designated not available for grazing.
123 / 036	There is no real guidance provided in this plan for managing or changing livestock grazing to protect or enhance Monument values. The DEIS brushes aside any guidance or control, and only providing for Standards and Guidelines review. Yet, in the Laidlaw Park allotment, BLM referred to amending the Laidlaw grazing plan in the future - based on finalization of the Craters RMP. As there is no guidance in the DEIS (not even to protect cultural sites from livestock damage), we can expect NO changes to protect Monument values to be applied as part of S&G livestock grazing determinations. The DEIS perpetuates harmful grazing practices and degradation.	All Allotment Management Plans for allotments within the Monument will be amended to follow guidance by this EIS. This specifically provides guidance and restrictions which apply to livestock grazing by closing areas to grazing, removing acres from allotments, and provides restrictions/guidance by implementing management zones. This EIS has identified which lands are available and unavailable for livestock grazing (See page 117, Chapter 3 under Livestock Grazing). This fulfills BLM Land Use Planning Appendix C requirements for decisions pertaining to Livestock Grazing. The S&G process is the chosen method to address livestock stocking rates rather than across the board reductions or increases because it allows managers to assess each grazing allotment individually and determine if adjustments are needed in the allotment. None of the alternative mandate grazing to continue at existing levels. The Proclamation expanding the Monument states: "Laws, regulations, and policies followed by the BLM in issuing and administering grazing permits or leases on all lands under its jurisdiction shall continue to apply with regard to the lands in the Monument administered by the BLM." Therefore a No Grazing alternative was not considered viable. The BLM does have flexibility to temporarily remove livestock to help achieve desired resource objectives. The DEIS does place restrictions on livestock grazing to protect natural resources. Examples of restrictions include excluding livestock from areas, identifying areas available and not available to grazing, allotment management plan conformance with the new Plan, allotment boundary adjustments, allotment conformance with Idaho Standards for rangeland Health and Guidelines for Livestock Grazing Management which requires all allotment to be meeting or making significant progress towards

Topic Grazing

Letter No./ Comment No.	Comment	Response
		meeting applicable standards. Some specific protections to natural resource conditions are included in the Management Guidance Common to All Alternatives Livestock Grazing section, and the Summary of Alternatives in table 7. Alternative C specifically prohibits new livestock facilities in the north pasture of Laidlaw Park.
123 / 037	We remind the DEIS preparers that the Monument Proclamation did not say that livestock grazing was sacred and immutable. Rather, it provides for continued livestock use on BLM lands – at unspecified levels, and management under existing regulations, including FLPMA. FLPMA allows for some lands to be used for less than all purposes. The Proclamation in no way constrains development of clear and necessary livestock grazing goals, objectives and management actions to protect important Monument resources and values.	Grazing practices must conform to resource management direction and Standards and Guidelines. The Standards and Guidelines require changes to grazing systems if Standards are not being met.
123 / 038	While BLM (DEIS at 29) refers to livestock developments being consistent with desired future conditions, nothing in this plan scientifically presents vegetation, soils, cultural, weed infestation site or other data, or an analysis of impacts of livestock projects on these factors, that would allow BLM to determine desired future condition.	The DEIS states on page 29, "BLM may remove developments if they are no longer serving a useful purpose or resource objectives warrant their removal. Sites would be restored." Thank you for your comment.
123 / 051	Not only did the DEIS not analyze a "no livestock grazing alternative", it failed to analyze any alternative that would significantly reduce livestock numbers. As livestock use and spread of weeds are inextricably tied to the very serious degradation of native vegetation and invasion of rush skeletonweed and other species here, it is imperative that BLM analyze a range of alternatives that significantly alters and reduces livestock disturbance; provides for long periods of post-treatment rest, etc. Elsewhere, the DEIS outrageously describes shifting livestock use to other and unknown areas while "restoration" occurs without any analysis of the impacts of these shifts.	This EIS has identified which lands are available and unavailable for livestock grazing (See page 117, Chapter 3 under Livestock Grazing). This fulfills BLM Land Use Planning Appendix C requirements for decisions pertaining to Livestock Grazing. The S&G process is the chosen method to address livestock stocking rates rather than across the board reductions or increases because it allows managers to assess each grazing allotment individually and determine if adjustments are needed in the allotment. None of the alternative mandate grazing to continue at existing levels. The Proclamation expanding the Monument states: "Laws, regulations, and policies followed by the BLM in issuing and administering grazing permits or leases on all lands under its jurisdiction shall continue to apply with regard to the lands in the Monument administered by the BLM." Therefore a No Grazing alternative was not considered viable. The BLM does have flexibility to temporarily remove livestock to help achieve desired resource objectives.
123 / 052	All restoration activities should be done with minimal new structures - use existing pasture boundary fences under all circumstances. Electric fences are notorious for failing – one-time grazing inundation of newly treated sites can destroy hundreds of thousands of dollars of re-seeding effort.	Thank you for your comment. This has been considered in the Final EIS.

Topic Grazing

Letter No./ Comment No.	Comment	Response
123 / 053	While BLM claims to have evaluated alternatives (53) to see how well they protect natural and cultural resources (including restoring degraded sagebrush vegetation, and prevent introduction of weeds and damage to cultural resources, provide a quality visitor experience, allow opportunities for solitude) it has provided no rationale for essentially ignoring assessment of an alternative range of livestock grazing and restoration actions. Instead, the DEIS here claims that the alternatives and the management actions were essentially the same for grazing! This is arbitrary and biased. In doing this, the DEIS failed to take a "hard look" at the environmental consequences of the MOST WIDESPREAD AND ENVIRONMENTALLY SIGNIFICANT AND DAMAGING ACTIVITY that occurs across nearly all non-lava lands.	This EIS has identified which lands are available and unavailable for livestock grazing (See page 117, Chapter 3 under Livestock Grazing). This fulfills BLM Land Use Planning Appendix C requirements for decisions pertaining to Livestock Grazing. The S&G process is the chosen method to address livestock stocking rates rather than across the board reductions or increases because it allows managers to assess each grazing allotment individually and determine if adjustments are needed in the allotment. None of the alternative mandate grazing to continue at existing levels. The Proclamation expanding the Monument states: "Laws, regulations, and policies followed by the BLM in issuing and administering grazing permits or leases on all lands under its jurisdiction shall continue to apply with regard to the lands in the Monument administered by the BLM." Therefore a No Grazing alternative was not considered viable. The BLM does have flexibility to temporarily remove livestock to help achieve desired resource objectives.
123 / 055	The DEIS claims its CBA process was "anchored in relevant facts". Yet, any analysis process was not anchored in relevant facts if it did not consider a range of livestock grazing alternatives and actions, and overlay that with the cumulative and synergistic effects of roads under the various alternatives. Example: Grazing largely unchanged cows and sheep and more open roads under Alt. D = more weeds than Alt. C..	See response to previous comment.
123 / 061	The "Mitigation Measures" (DEIS at 55-57) do not in any way adequately mitigate the effects of livestock grazing (status quo practices continued, no effort to limit livestock and rancher/herder weed spread, no protection for vegetation – such as modern-day limits on utilization, removal of harmful structures, etc., no protection of cultural sites from livestock impacts, no minimization of livestock grazing and trampling effects on soil and water resources – not even restoring any playas. The Preferred Alternative makes no effort to address the root cause of vegetation problems and altered fire ecology (i.e. livestock grazing). It opens the door to expanded livestock facilities, water hauling, etc. The vast array of roads that will remain open and the increased risk of fire danger, weed spread, etc., there can be no mitigation claimed for the preferred alt. As open roads are maximized, human-caused disturbance of wildlife is maximized. While claiming there would be areas with no hunting for public safety, it fails to provide areas that are now grazed that will not be	See response to previous comment.

Topic Grazing

Letter No./ Comment No.	Comment	Response
	grazed so that the public can enjoy ungrazed lands free of livestock pathogens. As previously discussed, the many open and improved roads and status quo livestock plus aggressive treatment of Alternative D will maximize air quality problems. Status quo livestock and maximum open and upgraded roads will lead to maximum erosion, disruption of site stratigraphy, exposure of artifacts to the surface and subsequent looting, maximum difficulty in controlling vandalism, etc.	
123 / 064	Why is "not permit any new livestock developments in North Laidlaw Park and Bowl Crater" not part of all alternatives? Why is there no Alternative that emphasizes no new livestock Developments – period?	The Proposed Plan/FEIS prohibits new livestock developments in the North Laidlaw Park pasture and Bowl Crater allotment unless they result in a net benefit to those resources identified as needing improvement or Protection. If analysis contained in a project-level EA for a proposed livestock development indicates or shows a need for protection of cultural sites, rare plants, or improvement to wilderness or resource conditions, then the development could be considered.
123 / 070	As previously stated, the DEIS fails provide an alternative that examines minimized livestock disturbance, and thus decreased flammable weed infestation and spread. Then, its assessment of major long-term beneficial impacts from keeping roads open and upgrading many roads while continuing status quo grazing while at the same time opening the lands up to large-scale "restoration" disturbance, is deeply flawed.	The DEIS does not mandate keeping livestock levels the same nor does it mandate upgrading many roads.
123 / 074	We request that the BLM and NPS analyze soils and test sheep currently grazed in the Monument for Q fever. Please see CDC data on Q fever and its implications, Attached.	The danger of Q fever is considered to be very minimal on rangeland in Idaho. There are only four known cases of Q fever recorded in Idaho since 1990. The risk on public lands to the users is very limited, since Q fever have been directly correlated to occupational exposure involving veterinarians, meat processing plant workers, sheep and dairy workers, livestock farmers and researchers at facilities housing sheep. The important fact of the Q fever bacteria is that during the birthing, the organisms are shed in high numbers within the amniotic fluids and placenta, birthing generally occurs on private lands.
123 / 078	DEIS at 88 fails to mention the role of livestock grazing in loss of sagebrush steppe, i.e. setting the stage for altered fire frequencies and casing weed infestation and spread. Throughout the discussion of sagebrush communities, complexly interspersed across the landscape, the DEIS fails to provide any information on their current condition, and the role of livestock grazing and livestock projects in altering site condition.	The discussion on DEIS pp. 86-98 regarding the current condition of vegetation within the Monument addresses the role of livestock, as well as other disturbance factors, in the loss of sagebrush steppe.
123 / 079	The DEIS at 89 claims "the northern part of Laidlaw Park has not been overgrazed. However, "historic" overgrazing, frequent	The grazing management in the North pasture has not been much different than the management in the South areas, this area has

Letter No./ Comment No.	Comment	Response
	wildfires, Aroga moth infestations, cheatgrass invasion, and noxious weeds have negatively affected the southern portions ...". What, exactly, is "overgrazing", and how dies it differ from current and ongoing grazing practices?	received less disturbances like wildfire, and is simply more resilient as a result of increased precipitation and different species present.
123 / 082	Please review references such as Anderson and Holte (1982) which describes increasing canopy cover and increasing understory grasses on areas on the Snake River Plain where grazing has been removed. Many of the processes that you blame for causing loss of native understory grasses are set in motion or caused by livestock.	Thank you for your comment. This has been considered in the Final EIS.
123 / 089	Instead of just allowing status quo predator killing, we request that you analyze an alternative that focuses on killing identified problem animals, and not blanket or non-specific aerial gunning in advance of sheep moving into an area and other such methods. As part of this plan, you should assess alternatives that minimize conflicts with predators - and require permittees to use a broad range of non-lethal methods before resorting to APHIS predator killing. Sheep should not be allowed to graze in areas where there are chronic conflicts with predators. Please identify such areas.	You can find guiding policies pertaining to predator control on page 104. Thank you for your comment.
123 / 094	As part of this process, we ask that prepare grazing suitability and capability studies. You must describe how grazing affects the costs and outcome of all alternatives. Please also provide data on the number of livestock actually grazed, and time when they are grazed. What is the basis for the statement (DEIS at 120) that grazing preference is not expected to decrease as a result of S&G analysis because most allotments are attaining, or making significant progress toward, attaining uniform achievement? The recent Laidlaw Park FRH and assessment shows this is not true. In fact, here BLM even cut some "paper" cows and sheep, but continued stocking levels well above the number of livestock that had actually been grazed in Laidlaw Park over the past decade or more, i.e. above actual use. BLM's own internal appeals court recognized the absurdity of the proposal to continue grazing livestock in excess of the average actual use that had occurred, and issued a Stay on the warped and livestock-industry-biased decision.	BLM will continue to monitor and use all available data which could include utilization pattern mapping, trend data, and S&G allotment assessments to determine suitability for grazing. This EIS has identified which lands are available and unavailable for livestock grazing (See page 117, Chapter 3 under Livestock Grazing). This fulfills BLM Land Use Planning Appendix C requirements for decisions pertaining to Livestock Grazing. The S&G process is the chosen method to address livestock stocking rates rather than across the board reductions or increases because it allows managers to assess each grazing allotment individually and determine if adjustments are needed in the allotment. None of the alternative mandate grazing to continue at existing levels. The Proclamation expanding the Monument states: "Laws, regulations, and policies followed by the BLM in issuing and administering grazing permits or leases on all lands under its jurisdiction shall continue to apply with regard to the lands in the Monument administered by the BLM." Therefore a No Grazing alternative was not considered viable. The BLM does have flexibility to temporarily remove livestock to help achieve desired resource objectives.
123 / 096	Also, in Laidlaw Response to Protest at 5, BLM stated in response to WWP's Protest that BLM had failed to conduct a current suitability and capability study and determine the appropriateness	See response to previous comment.

Topic Grazing

Letter No./ Comment No.	Comment	Response
	of livestock grazing: "this Protest is outside the scope of this document. Suitability studies are conducted at the Land Use Plan Level Analysis". So, why has no suitability or capability study been presented as part of the Craters DEIS?	
123 / 113	While the DEIS proposes that all visitors remain on trials, it does nothing to address the livestock grazing and trampling damage that occurs here. How does visitor trampling in Laidlaw Park compare to livestock trampling? Please quantify the relative disturbance caused.	Neither the Proclamation nor the DEIS restricts visitor use to trails.
123 / 126	While the DEIS assumes continued livestock grazing, there is nothing at all in the Proclamation that limits the DEIS from providing goals, objectives and management actions to control it. Unless you do that here, livestock grazing will be conducted without any guidance from a Land Use Plan. Sadly, the reality is that the old Land Use Plans documents actually control grazing more than this DEIS. Something is better than NOTHING, which is what the DEIS does. By stating that livestock grazing will governed by applicable laws and regulations and the Standards of Rangeland health, and taking no action here to address or control it, you are leaving management free-floating, with no overarching guidance. FRH assessments occur on an allotment-by-allotment basis. There is no broad or landscape-level look taken at the effects. The DEIS is the document that must do that, and it has not. While livestock grazing is subject to the S&G, it is the role of this RMP to set Goals and Objectives and Management Actions. You have failed to do so.	On page 29 the DEIS states desired future conditions pertaining to livestock grazing.
123 / 128	Specific locations must be identified for sheep camps – as they concentrate use, spread weeds (witness the knapweed infestations in nearly all sheep camp locations in the Bennett Hills) and camps limited to only those areas. Areas identified must minimize conflicts with recreational visitor use.	Sheep herders would continue to use traditional sheep bed grounds. Establishment of new camp sites would be unlikely. BLM makes recommendations regarding the use of existing sheep bed grounds and discourages the use of new areas at annual meetings with the grazing permittees. If a specific need is identified, the BLM would close sheep bed grounds on a case-by-case basis, as warranted.
123 / 134	Please explain how failing to address and provide goals, objectives and management actions for livestock grazing is compatible with avoiding or minimizing adverse impacts on resources. Livestock grazing impairs sagebrush ecosystems, whose integrity is necessary to fulfill specific purposes identified in the enabling legislation. Its regulation and amelioration or curtailment of its impacts are critical to protecting both the natural and prehistoric cultural integrity of the Monument.	On page 29 the DEIS states desired future conditions pertaining to livestock grazing.

Topic Grazing

Letter No./ Comment No.	Comment	Response
123 / 140	Please provide science supporting the conclusion that impacts of new livestock developments – such as water troughs or wells, would be minor.	Two livestock trails that cross lava flows now administered by the NPS are specifically identified on page 121 of the DEIS. Appendix F in the Proposed Plan/FEIS addresses potential future uses of these trails.
123 / 142	The analysis for livestock trailing is only made on the basis of a comparison between alternatives, and no assessment of the real damage caused by trailing livestock, especially across lava, through areas of sensitive species habitat, etc., is made. This masks impacts. The whole reason for not analyzing a range of livestock grazing alternative actions appears to be purposeful avoidance of analysis of the honest impacts of grazing, and the science that shows grazing harms.	The Proclamation recognized existing roads and two-tracks across narrow strips of exposed lava for trailing livestock. There are two additional livestock trails specifically identified on page 121 which will be further evaluated for impacts as stated in Appendix F on page 335.
123 / 149	DEIS at 160 claims new livestock facilities would only create "moderate" impacts, but the Smith allotment fiasco. DEIS at 161 fails to assess the cumulative impacts of livestock facilities (including new pipelines, troughs, water hauling in "passage" zones) on disturbance of soils.	Monument-wide management actions and cumulative impacts of livestock facilities on soil resources were analyzed and characterized at an appropriate level of intensity for the DEIS (See Ch. 4 of the DEIS, pp. 158 – 162). Specific, project-level analysis of cumulative impacts will be provided in individual range improvement project Environmental Assessments.
123 / 153	DEIS at 164 errs in claiming there would be no change in livestock use. By allowing more livestock facilities in upgraded "Passage one" areas under Alt. D, livestock grazing would be increased and/or significantly shifted with new epicenters of damage, and this would allow likely increases in actual use by livestock, as water allows extensive use of new areas, increased water hauling on "improved" roads extends degradation, etc.	The placement of livestock facilities within an allotment would be analyzed in planning documents appropriate for the scope of the project. The designation of Passage Zone does not guarantee the installation or improvement of any facilities or roads that are allowed by the zone description, but simply allows for a greater level of flexibility based on anticipated management needs. However, in response to public concerns, the ID team reduced the amount of Passage Zone that was originally proposed in Alternative D in the Proposed Plan/FEIS, particularly in Laidlaw Park.
123 / 161	Existing livestock projects and livestock use have severe impacts on playas and water for Q fever. Here again, the DEIS pawns off assessment of impacts of livestock impacts on playas standards for livestock grazing.	BLM does not identify playas as riparian areas according to the riparian area definition in the BLM Technical Reference TR 1737-9 and 11. TLM presently has no data or standards to evaluate playas. Therefore, BLM will use the professional judgment to determine if the standards for rangeland health are being met or we are moving towards meeting them, that the health of the playas will also be met. The DEIS does not alter grazing management so the impacts of grazing on water quality are substantially the same for all alternatives. The Draft EIS page 172) concludes that livestock grazing is expected to be long term with intensity ranging from negligible to potentially major in local sites depending upon the concentration and duration of livestock use.

Topic Grazing

Letter No./ Comment No.	Comment	Response
123 / 166	Here, too, the DEIS admits that livestock distribution may change with new developments, but fails to analyze the impacts of existing or potential new developments. There is no analysis of the impacts of current grazing standards on wildlife – for example, what effect will 50% or greater livestock utilization have on sage grouse nesting cover?	Additional analysis (specific to livestock developments) has been added to the wildlife sections of the FEIS.
123 / 169	See previous discussions of air pollution from soil displaced by livestock and containing possible livestock-harbored pathogens such as Q fever, road upgrades, herbicides, restoration projects, etc. In particular, airborne livestock pollutants must be considered here.	The danger of Q fever is considered to be very minimal on rangeland in Idaho. There are only four known cases of Q fever recorded in Idaho since 1990. The risk on public lands to the users is very limited, since Q fever have been directly correlated to occupational exposure involving veterinarians, meat processing plant workers, sheep and dairy workers, livestock farmers and researchers at facilities housing sheep. The important fact of the Q fever bacteria is that during the birthing, the organisms are shed in high numbers within the amniotic fluids and placenta, birthing generally occurs on private lands.
123 / 170	The DEIS admits (at 206) ICBEMP directs BLM to update Land Use plans to address major issues. Livestock grazing is a major issue. You have not prepared a plan that addresses its impacts, in violation of the MOU.	The DEIS is not in violation of the MOU and does address impacts associated with grazing.
123 / 172	DEIS at 209 describes shifting livestock use to other allotments as treatments are done. It appropriate stocking rates, and identify how this use will occur. Please evaluate all the harmful impacts of "improved" livestock distribution.	Page 209 of the DEIS is describing potential impacts to livestock grazing under alternative D. This is simply a range of possible scenarios which could occur. The planning team has tried not to identify site specific locations of implementation level decisions at this time. Please read the resource specific Environmental Impact section for impacts to those resources resulting from livestock grazing.
123 / 173	Please evaluate all the harmful impacts of grazing both sheep and cattle on the same lands.	The Standard and Guideline process will evaluate the impacts of grazing both cattle and sheep on the same land, or has already evaluated the impacts and made appropriate change if needed to meet standards.
123 / 175	The DEIS has failed to assess the irreversible harms caused by new or shifted livestock facilities and use, an Upgraded road network and myriad open roads leading to more human-caused fires and more irreversible weed invasions, etc. The EIS has also failed to assess the ongoing irreversible changes to native plant communities being caused by status quo livestock grazing practices.	The Preferred Alternative does not mandate expanded road upgrades and livestock projects, however the potential impacts associated with a greater proportion of Passage Zone were analyzed. Potential impacts of livestock use and road development as they vary by alternative were analyzed in the DEIS, Ch. 4. Specific effects of allotment or travel management decisions will be addressed in the appropriate implementation-level plan.

Topic Grazing

Letter No./ Comment No.	Comment	Response
123 / 181	DEIS at 334 describes "livestock administration and states that under the DEIS, "there is no change in AUM preference, acres available for grazing, acres not available for grazing, or allotment size from one alternative to another.	The DEIS does allow suspension of livestock permits for resource benefit, temporary removal of livestock from areas, and adjustments in livestock management.
123 / 188	The introduction, establishment and spread of invasive species due to livestock grazing must be minimized by the following methods: 1) Retire domestic livestock grazing permits at earliest opportunity where grazing has been found to promote invasive species invasion or persistence; 2) Prioritize invasives prevention and restoration activities for areas where domestic livestock grazing has been permanently ended 3) Manage livestock movement patterns to insure animals are not moving seeds of invasive species from infested to non-infested areas; 4) Manage livestock grazing to favor native species (set use/utilization standards that protect plants, allow no critical growing period grazing); 5) Remove livestock facilities that are fostering invasive species invasion, or leading to degradation of native communities or key wildlife habitats. 6) Avoid grazing in systems that still contain a strong component of native perennials, biological soil crusts, or other features known to act as natural barriers to invasion or increase of invasive exotic species.	The DEIS acknowledges that livestock are known vectors to the spread of noxious weeds (Ch. 3, Discussion on Noxious and Exotic Species, p. 92). A full Integrated Weed Management Program addresses a broad range of prevention, education, and control activities to combat noxious weeds (see DEIS p. 25, Management Guidelines Common To All Alternatives: Vegetation, Including Special Status Species, and Fire Management). Thank you for your comments. We will consider them in the appropriate implementation level planning efforts.
123 / 193	Livestock Control Post- Treatment or Post-Fire * Clear and measurable standards of recovery must be established and be met post-treatment or post-fire, before any livestock grazing disturbance can again resume on a site. * Monitoring must be used to inventory baseline conditions at the landscape and local levels. Measure whether positive goals for native ecosystem recovery, conservation and integrity are being attained. Track biodiversity and health using an increaser/decrease species procedure (including biological crusts, wildlife, and endemic/sensitive species). Practice precaution retain, flexibility, and respond to change, unforeseen harm, failure to reach objectives, and/or new information. Quantify invasive species population changes Monitoring of vegetation treatments must relate the clearly stated objectives of al restoration projects, be an integral component of each project, be incorporated in to the initial costs of each project. Use scientific principles of experimental design including replication and measurements from untreated areas for comparison with treated locations, use a process responsive to all-party and scientific input, outline clear procedures for responding to monitoring and evaluation results. Monitoring	Thank you for your comment. We will consider these points in the appropriate implementation- and project-level plans.

Topic Grazing

Letter No./ Comment No.	Comment	Response
	methods for treatments, livestock grazing, all actions must be: Relevant, sensitive, available, measurable, defensible, verifiable, inclusive, scheduled. All proposals must contain a description of the monitoring that will be necessary, and an annual report prepared and presented to the public. An over-all assessment of "risk" associated with any treatment must be prepared. Risk includes failure of any seeded species, chances of exotic invasion, human health effects, etc. Monitoring needs to be documented so that it can be independently reviewed by non-BLM/agency scientists, the scientifically-literate public, and others who are concerned about the ecological health of federal public lands.	

Topic NEPA Process

125 / 010	Impacts should be evaluated and disclosed in a fair and unbiased manner and with a relative sense of magnitude. Analysis of vehicle use should be compared and contrasted to analysis of the environmental effects of natural events including floods, wildfires, drought etc. The absence of a rational connection between the facts found and the choice made has been defined by the courts as arbitrary and capricious (Natural Resources. v. U.S., 966 F.2d 1292,97, (9th Cir.'92». A clear error of judgment; an action not based upon consideration of relevant factors and so is arbitrary, capricious, an abuse of discretion or otherwise not in accordance with law or if it was taken without observance of procedure required by law (5 USC. 706(2)(A) BLM's environmental analysis of alternatives must not be pre-occupied With documenting what can be presently observed on the ground (at various points in time) while ignoring the legally relevant issue of whether on-the-ground conditions constitute significant impacts to the human environment.	The DEIS includes discussion of the methodologies used and the assumptions made in analyzing the potential impacts of the alternatives on Monument resources. Thus, for each resource topic, the sources of data are identified, the basis of the analysis is described, and the levels of impact intensities are defined. The types of impacts, including cumulative impacts, examined in the DEIS are described in detail on page 148.
104 / 020	Irreversible and Irretrievable Commitments of Resources- Information should be provided that compares the irreversible and irretrievable commitments of resources in each Alternative. This information is important considering that most of the irreversible impacts are associated with increases in the acreage of Passage Zone.	The "Irreversible and Irretrievable Commitment of Resources" section of the Final EIS discusses the irreversible and irretrievable impacts to various resources under each alternative.

Topic Wildlife

Letter No./ Comment No.	Comment	Response
160 / 001	I am writing to express my great disappointment with the proposed management plan for the Craters of the Moon National Monument (CMNM). The plan in its present state does nothing to address the needs of vanishing wildlife and plant species in the CMNM, nor does it allow for recovery of the area from years of overgrazing and ecosystem degradation due to excessive road-building. Please consider this as an earnest request to go back to the drawing board and prepare a plan that truly addresses the needs of the wild creatures and native plant species that inhabit Craters of the Moon. This unique ecosystem must not be allowed to become just another dead landscape!	The agencies believe that the restoration objectives will improve habitat for many wildlife species. The closure of roads in the Pristine Zone will also improve habitat and reduce fragmentation over time.
159 / 001	The Draft Management Plan and EIS for Craters of the Moon National Monument and Preserve fails to take actions necessary to protect the vanishing Craters sagebrush ecosystem and its plummeting sage grouse, pygmy rabbit and migratory songbird populations.	Thank you for your comment. The Proposed Plan/FEIS does call for an increase in rehabilitation of areas back to functional sagebrush systems as well as the protection of existing habitats. In response to this and similar comments additional protections for sage-grouse have been incorporated into the Proposed Plan/FEIS. These can be found in Wildlife Section and Management Actions in the plan.
128 / 002	The values of the ACEC area should include the ecology of animals and their interactions in the ACEC area such as among grouse, pygmy rabbits, prairie or peregrine falcons, antelope, deer, elk, and other species including birds and reptiles. The NPS notes that there are 300 species in this area. Have you reported half that number? The interactions of these species have never been adequately studied on Idaho's BLM land and they certainly should. It would be better to do this sort of study on land that was ungrazed by livestock, but that does not seem possible on BLM land because of your intransigence, no matter how unique that land may be.	The proposed management actions call for an increase in inventory (collection of baseline data) and monitoring of several species of interest.

Topic Wildlife

Letter No./ Comment No.	Comment	Response
103 / 003	I also am disappointed that the management of these park lands as prime wildlife habitat is not made a higher priority. There should be plans made to reintroduce species that are threatened or endangered in other parts of the West, back into this very large and therefore prime wildlife acreage. This Monument provides an opportunity for an ecosystem approach to these lands and the restoration of the wildlife so heavily impacted by development and human activities in the West.	The re-establishment of bison, grizzly bear, and bighorn sheep (the only three species know to previously occur in this region) has been studied. The conclusions were that there is insufficient habitat within the Monument to support either bison or grizzly bears. Bighorn sheep re-establishment is not feasible as long as domestic sheep grazing occurs where the two species may interact.
106 / 004	Roads create fragmented habitats, and with the proposed increase under Alternative D, they will result in increased road kill. This is especially true for ~.." ~ sage grouse that often forage or have their leks along open areas.	In response to this and similar comments, modifications were made in the preferred alternative to reduce the number and size of areas zoned as Passage within the Monument.
165 / 005	The Service recommends that pygmy rabbit populations and their potential habitat within the Monument be identified and each alternative be assessed for its potential impact on pygmy rabbit populations. This sagebrush obligate species is identified by the BLM as a sensitive species and by the Idaho Fish and Game as a game species of special concern. Many public lands activities could have negative impacts on pygmy rabbits and their habitat, including off highway travel, hunting, fire (both prescribed and wildfire), livestock grazing, and pesticide use. In particular, we suggest that proposed fire projects be scrutinized carefully with regard to the potential for impacts to this species. Pygmy rabbits are reluctant dispersers and do not do well over large fragmented habitats. The timing, shape, size and juxtaposition of a fire footprint on the landscape are important considerations when managing for pygmy rabbits.	Many of the impacts mentioned will be addressed later in implementation-level plans including Transportation, Fire, and Wilderness Management Plans. Each of these plans, as well NEPA documents for individual projects, will address pygmy rabbits as well as other sensitive or rare species. Specific project planning will also address the needs of these species. Inventory work for rabbits will continue and the agencies will take appropriate actions when rabbits or quality habitat are identified. We agree that consideration of the pygmy rabbit is important. BLM and NPS policy insures that appropriate measures will be taken to reduce or eliminate negative impacts to the pygmy rabbit and its habitat. Additionally, our goal of restoring degraded sagebrush steppe habitat will provide additional quality pygmy rabbit habitat over the current situation.
88 / 006	developments. Existing water developments in Craters are not only epicenters of weed infestation and spread, the troughs have been documented to drown migratory birds, Inhabitants including antelope and even prairie falcons.	It is already BLM policy to require escape ramps on all livestock water troughs and tanks.
89 / 006	water developments. Existing water developments in Craters are not only epicenters of weed infestation and spread, the troughs have been documented to drown migratory birds, mammals including antelope and even prairie falcons.	Same response as previous comment.

Topic Wildlife

Letter No./ Comment No.	Comment	Response
102 / 006	developments. Existing water developments in Craters are not only epicenters of weed infestation and spread, the troughs have been documented to drown migratory birds, mammals including antelope and even prairie falcons.	Same response as previous comment.
165 / 006	The Service recommends that the final document identify where the areas to be restored are located in relation to areas of sage grouse habitat, cattle allotments that are or are not meeting standards, healthy seed source areas for sagebrush and associated native vegetation, pygmy rabbit habitat, and habitat for neo-tropical migrant birds that are obligate to certain stand densities (often different from sage grouse needs) such as sage sparrow, Brewer's sparrow, and sage thrasher. This is necessary information to disclose in order for the public and interested agencies to assess the impacts the different alternatives may have on "public trust" resources.	A vegetation inventory and assessment for Laidlaw Park, Little Park, and Paddelford Flat, which considered habitat needs for sagebrush-steppe obligate wildlife, was performed by the BLM and The Nature Conservancy in 2002/2003 (Jurs and Sands 2004). This evaluation was utilized in estimating proposed restoration acreages in the Monument. A map based on this assessment (Figure 15) showing the biotic integrity of Monument lands is included in the Proposed Plan/FEIS. Those areas identified as being in poor ecological condition, particularly those in Laidlaw Park, have been identified as highest priority for restoration treatment. As directed by Management Guidance Common to All Alternatives (DEIS p. 25) and Management Guidance specific to the preferred alternative (DEIS p. 49), restoration treatments would be placed to protect existing sagebrush steppe, restore degraded communities, and enlarge and connect fragmented stands. Specific restoration treatment methods and locations would be defined in environmental assessments for restoration in Laidlaw Park and other areas of the Monument, which would be available for public review.
111 / 007	Existing livestock water developments, which promote the spread of weeds and drown migratory birds and other animals, should be closed or, where wildlife are shown to depend on the water source, redesigned to prevent drowning.	It is already BLM policy to require escape ramps on all livestock water troughs and tanks.
159 / 008	Existing water developments in Craters are not only epicenters of weed infestation and spread, the~ troughs have been documented to drown migratory birds, mammals including antelope and even prairie falcons. Conduct real restoration, relying on passive restoration techniques wherever possible (limit livestock grazing, close roads, remove livestock facilities that are causing weed spread). Use only native plants in all seedings.	It is already BLM policy to require escape ramps on all livestock water troughs and tanks.

Topic Wildlife

Letter No./ Comment No.	Comment	Response
82 / 008	Existing water developments in Craters are not only epicenters of weed infestation and spread, the troughs have been documented to drown migratory birds, mammals including antelope and even prairie falcons.	It is already BLM policy to require escape ramps on all livestock water troughs and tanks.
128 / 011	Use no poisonous control of invertebrates, as for Mormon Crickets, in Laidlaw Park Kipuka. This is especially critical in light of the occurrence of what I'm told is a rare variety of grasshopper-the Idaho point-headed grasshopper-as well as other invertebrates that would be killed by the poison. Spraying in the North Laidlaw ACEC is not appropriate in any event.	This issue is dealt with under separate NEPA documents associated with the statewide agreement with USDA.
70 / 011	Arial gunning does create major short term impact to the soundscape without specifically treating direct predator control on offending animals. "Demonstrated need" should not include general population reduction on the Monument or preserve. Arial gunning should not be allowed.	Thank you for your comment, we have made appropriate and responsive changes to Chapter 2.
128 / 013	Protect fairy shrimp in all playas in the Monument.	Protection of playas is provided for in management directions common to all, Water resources, p. 26 in the DEIS. Additional protection has been added to the Proposed Plan/FEIS (See Appendix J, Fire Management and Vegetation Treatment Protocols).
121 / 015	We understand that Wildlife Services currently conducts annual aerial gunning of coyotes and other predators prior to the turn out of livestock over the non-WSA lands in the Monument. We believe destruction of natural predators and other parts of a natural ecosystem are inconsistent with the purposes of the Monument. We ask the NPS and the BLM to discontinue this practice within the Monument and exempt the Craters of the Moon National Monument and Preserve from predator control projects that do not specifically target an individual aggressor. An exemption also makes sense because less than 30 percent of the Monument qualifies for aerial gunning predator control without environmental analysis. The use of poisons, traps, and other methods for predator control in the Monument should not be allowed either. Poisons, traps, and other mechanisms can cause significant harm to other wildlife species, as well as people and pets visiting the Monument.	Thank you for your comment. We have made appropriate and responsive changes to Chapter 2.

Topic Wildlife

Letter No./ Comment No.	Comment	Response
104 / 021	The FEIS needs to detail the degree to which each alternative will benefit wildlife within the Monument. Specifically, the REIS should expand its analyses of sage grouse, pygmy rabbit and migratory songbird populations.	NEPA requires the EIS to disclose the effects of the alternatives. We believe the analysis is sufficient. No rational is provided to support the need to expand the analysis. We have however, identified new information on some species and have incorporated it into the analysis.
165 / 026	Page 249-Consultation with the U.S. Fish and Wildlife Service. We recommend the last sentence of the paragraph be changed to read: "Informal consultation with USFWS…" Informal consultation is an optional process that includes all discussions, etc., between the agencies to assist the Federal action agency in determining whether formal consultation is required.	The recommended text change was made.
123 / 033	DEIS at 26 describes Actions and stipulations necessary to protect special status species would be made part of monitoring plans (limiting fragmentation of special status species populations with road networks). What about fragmentation caused by sheep bed grounds, salting, water hauling, etc.??? Plus, without conducting necessary baseline inventories for special status species as part of the DEIS process, you cannot have an understanding of habitat components that must be protected. Important information on current populations of special status species and species of concern must be collected. How are their habitats fragmented? What is a viable population level? How will you address sagebrush-die-off, livestock structural alteration of shrubs and other factors?	We agree with this comment. The DEIS was prepared with best information available to the agencies. The proposed management actions call for increased inventory (collection of baseline data) and monitoring of both Special Status plant and animal species. See page 26 of the DEIS.
123 / 066	While the DEIS claims it will adopt interagency habitat guidelines for sage grouse and sagebrush steppe obligates and that it will authorize actions and stipulations to protect special status species habitats, it provides no management goals, objectives or guidance to minimize or control livestock impacts to these species. It even fails to identify important and critical habitats for special status species, an essential component of a land management plan.	The DEIS specifies that Rangeland Health Standards and Guidelines will be used to guide livestock management. Rangeland Health Standards and Guidelines (which dictate habitat goals) requires healthy, diverse, and productive native animal habitats and native plant populations be maintained or achieved. This process also assists the agencies in identifying important habitat.

Topic Wildlife

Letter No./ Comment No.	Comment	Response
123 / 087	While DEIS at 101 discusses the occurrence of pygmy rabbit and sage grouse, the DEIS fails to describe and assess the impacts of current land use activities on these species. How is livestock grazing affecting these species? As part of our comments, we are attaching a copy of the pygmy rabbit petition that details livestock impacts to burrows, herbaceous vegetation and sagebrush structure required by the pygmy rabbit, and its impacts to sagebrush ecosystems. Please incorporate this and information found in the Literature Cited into the Supplemental EIS so that you can better describe the Affected Environment, and understand the environmental impacts of any alternatives.	The effects of current management are found in Chapter 4 under alternative a (pages 176-178 of the DEIS). The agencies will review the pygmy rabbit petition and incorporate appropriate information.
123 / 088	While you discuss the potential for grasshoppers to be pests, you do not describe the link between disturbed lands and higher population levels of these species.	Comment is noted.
123 / 116	Please also detail all hazards to recreationalists from Wildlife Services, as a subsidy to the livestock industry, killing predators in or surrounding the Monument. What are the hazards associated with use of M-44s, traps, aerial gunning and other WS activities? Which of these activities are currently carried out on Monument lands? As part of this process, you must limit WS activities to killing target animals only, not broadscale aerial slaughter and trapping as has occurred in the past. Plus, there must be limitations on WS activities and associated disturbance of wintering big game, lekking sage grouse, etc. In which allotments, and where, has WS operated in the past? How many coyotes, bobcats, badgers, etc. are killed by WS inside the Monument, and where, on an annual basis? What methods are used? This DEIS must forbid involvement of WS in “research” on Monument lands. WS in southern Idaho has a history of seeking to expand its activities by engaging in what it terms “research” to kill sage grouse predators. This involves the use of the arsenal of lethal methods previously described as well as poisons to kill corvids – and who knows what new chemicals may be proposed for use over the life of this plan. The DEIS must forbid WS conducting lethal research on Monument lands. As you may be aware, a federal court found that environmental analysis of a 2003 sage grouse predator killing plan was insufficient – lack of analysis, and a scorched earth approach characterizes such proposals from WS, and this plan must prohibit such activities.	Thank you for your comment. We have made appropriate and responsive changes to Chapter 2.

Topic Wildlife

Letter No./ Comment No.	Comment	Response
123 / 159	As you have failed to conduct necessary baseline inventories for special status species, you can not conclude that impacts of either ongoing activities or new actions will be minor under any alternatives (DEIS at 168, for example).	We utilized the best available information in conducting our analysis. Funding and personnel limitations precluded doing intense surveys for every species. We did contract for the most recent data concerning sage grouse and pygmy rabbit. Since you have not provided any data that would question our analysis we must conclude that the information we used is correct and adequate.
123 / 162	In this Laidlaw assessment, BLM relied on old, stale data that did not reflect the true current degraded state of the land after several years of drought. BLM also tried to extend big game and other species.	This comment is outside the scope of the DEIS.
123 / 163	DEIS at 176 to 182. The DEIS grossly under-represents the impacts to wildlife and How will you monitor populations? Please note that many species that are declining do not require a disturbance “mosaic” game?	We agree with this comment. The DEIS was prepared with best information available to the agencies. The proposed management actions call for increased inventory (collection of baseline data) and monitoring of both Special Status plant and animal species. See page 26 of DEIS. The effects of current management are found in Chapter 4 under alternative a (pages 176-178 of the DEIS). The agencies will review the pygmy rabbit petition and incorporate appropriate information.
123 / 165	We believe your assertion that Lewis’ woodpecker, red-naped sapsucker and other species would be adversely affected by fire suppression is nonsense. These species also use trees that succumb to natural mortality. The more aspen suckers that escape devouring by livestock, the greater potential habitat for aspen-dependent cavity nesters.	Comment is noted by the agencies.
123 / 180	While the DEIS provides lists of special status species and migratory species on the Monument, it provides scant analysis of impacts of current activities, or alternatives, to these species. The number of species on these lists show how essential baseline surveys are to allow a “hard look” to be taken in the DEIS (SEIS).	We agree with this comment. The DEIS was prepared with best information available to the agencies. The proposed management actions call for increased inventory (collection of baseline data) and monitoring of both Special Status plant and animal species. See page 26 of the DEIS.

Topic Socioeconomics

Letter No./ Comment No.	Comment	Response
120 / 003	Most of the Craters of the Moon National Monument is located within Blaine County. It will be local law enforcement paid by Blaine County taxpayers who will be responsible for problems resulting from the increase use of the Monument. More visitors, and more problems will arise from Alternative D than our Preferred Alternative C.	The agencies acknowledge the valuable services including law enforcement, search and rescue, and structural fire provided by the counties in which the Monument is located. The agencies will continue to cooperate closely with the counties through mutual aid agreements to minimize impact upon these rural counties.
125 / 003	Socio-economic effects of each alternative must be properly analyzed. Economic effects on rural development are often seen as a peripheral consequence instead of as a valid issue or even documented need in Alternative formulation. It is essential, that an Alternative be formulated that makes some attempt at developing rangeland and forest management projects and uses that will proactively stimulate local, rural economic growth. This is extremely important to community leaders, both in and out of government, in order for them to judge the effectiveness of alternatives in aiding rural development. It is also required by NEPA, in order to portray a sound range of alternatives based on the identified issues. Economics has equal standing with other factors in that law and deserves equal attention.	The NPS and BLM proactively involved local county and community officials in scoping of the Draft Management Plan and development of the management alternatives analyzed. Through this process, several economic issues were identified and included in the alternatives. These include provisions for locating Monument facilities outside the Monument, opportunities for surrounding "gateway" communities to provide services and facilities to visitors, and opportunities for outfitter and guide operations and concession activities within the Monument, among others. A more thorough analysis of the potential economic and social impacts of the management alternatives has been included in the FEIS.
123 / 059	Please provide the costs to taxpayers of components of alternatives, such as treatment costs per acre under Alternative D actions that are contemplated.	The estimated costs of the alternatives, described on pages 53 – 55 of the DEIS, were developed for comparative purposes only. The precision of this level of estimation is not sufficient to accurately identify costs of specific projects or costs per acre.
123 / 124	The discussion of economics fails to provide information on the limited economic value of livestock grazing associated with the Monument. You cannot point to Ag. Statistics – as "farming" has ranching subsumed within it. How much does the grazing program on Monument lands cost to administer? What is the estimated value of recreational opportunities lost due to livestock grazing? What are the costs to wildlife populations, and thus to wildlife-viewing, photography, hunting and other recreation?	Additional information on Socioeconomic impacts has been added to the FEIS.

Topic Socioeconomics

Letter No./ Comment No.	Comment	Response
123 / 171	There is no evidence that anything in this EIS will cause "dramatic economic changes" economic importance of livestock grazing here.	The Cumulative Impacts analysis in the DEIS includes a wide range of reasonably foreseeable projects and actions whose impacts could be cumulative with the management alternatives.
123 / 179	DEIS at 303 claims that livestock grazing contributes to the health of local economies, but fails to quantify the economic impacts (positive and especially negative) of public lands livestock grazing.	Additional Socioeconomic information has been added to the FEIS.

Topic General

152 / 001	While I support aggressive weed control, fire management, and restoration, this proposal to further develops roads and will actually increase the threat of noxious weeds and fire risk, as well as accelerate damage to wilderness values and geologic features. I support the adoption of Alternative C, which actively restores primitive and pristine areas and ensures the strongest conservation protections for the Monument in the future.	Analysis in the DEIS (Ch. 4) acknowledges the risk of increased road improvement relative to weed infestation, fire risk, wilderness values and geologic features. In response to comments such as this the ID team reduced the amount of Passage Zone in the Proposed Plan/FEIS, particularly in Laidlaw Park. The implementation plan for transportation will address road maintenance and improvement within specific areas and zones of the Monument, with consideration to these and other issues.
154 / 001	While the need for weed control, fire management, and restoration, are very important the proposal to further develop roads will more than likely increase the threat of noxious weeds and fire risk.	Analysis in the DEIS (Ch. 4) acknowledges the risk of increased road improvement relative to weed infestation, fire risk, wilderness values and geologic features. In response to comments such as this the ID team reduced the amount of Passage Zone in the Proposed Plan/FEIS, particularly in Laidlaw Park. The implementation plan for transportation will address road maintenance and improvement within specific areas and zones of the Monument, with consideration to these and other issues.
34 / 001	I am writing in support of the City of Arco continuing to be the Gateway for the Crater's of the Moon National Monument. Arco is the closest town and has always supported the families, employees and visitors of the Crater's of the Moon.	The support of communities adjacent to the Craters of the Moon National Monument and Preserve is an important link for visitors to the area. We expect this relationship to become stronger. The agencies do not designate a community as the official "Gateway" to the Monument, but ideally one or more communities strategically located near the Monument will determine for itself to associate in a positive way with the Monument. The agencies intend to work closely with all communities surrounding the Monument.

Topic General

Letter No./ Comment No.	Comment	Response
24 / 001	I am writing this letter in support of Butte County and the city of Arco becoming the Gateway for the Crater's of the Moon National Monument. My reasons are that the City of Arco has two major state highways joining together so that many tourists use to go to the Crater's of the Moon.	Same response as previous comment.
23 / 001	It has come to our attention that there is a question as to what city will have the 'Gateway to the Craters of the Moon' designation. The city of Arco has long had that designation and we sincerely wish to keep it. As the President of the Butte County Chamber of Commerce, I pledge our support of that continued designation. As a Chamber we will do all that is in our power to lend our support to the Monument and to keeping the 'Gateway' designation for the City of Arco.	The support of communities adjacent to the Craters of the Moon National Monument and Preserve is an important link for visitors to the area. We expect this relationship to become stronger. The agencies do not designate a community as the official "Gateway" to the Monument, but ideally one or more communities strategically located near the Monument will determine for itself to associate in a positive way with the Monument. The agencies intend to work closely with all communities surrounding the Monument.
25 / 001	This letter is written on behalf of the Board of Trustees of the Butte County Joint School District #111 in support of Arco as the "Gateway To The Craters Of The Moon National Monument."	The support of communities adjacent to the Craters of the Moon National Monument and Preserve is an important link for visitors to the area. We expect this relationship to become stronger. The agencies do not designate a community as the official "Gateway" to the Monument, but ideally one or more communities strategically located near the Monument will determine for itself to associate in a positive way with the Monument. The agencies intend to work closely with all communities surrounding the Monument.
30 / 001	On behalf of the Arco City Council and the residents of Arco, I am writing to you concerning the Visitor Centers and the Gateway to the Craters of the Moon. We would encourage you to retain this honor in Butte County.	Same response as previous comment.
32 / 001	I am proud of the title of Arco as the Gateway to the Craters of the Moon. I sincerely hope that we will be able to retain this title where it has been proudly represented.	Same response as previous comment.
73 / 001	In the Introduction on Page 3, the plan states that Craters of the Moon National Monument was the first national park site in Idaho. According to BLM Land Status records approximately 37,130 acres of Yellowstone National Park is in Idaho. We recommend that the sentence be rewritten to "Craters of the Moon National Monument, the first national Monument in Idaho, Was established on May 2, 1924."	Thank you for pointing this out. The text has been corrected.

Topic General

Letter No./ Comment No.	Comment	Response
31 / 001	I would like to see Arco Idaho claim the title of "Gateway to the Craters" simply because, Arco is the Gateway to the Craters.	The support of communities adjacent to the Craters of the Moon National Monument and Preserve is an important link for visitors to the area. We expect this relationship to become stronger. The agencies do not designate a community as the official “Gateway” to the Monument, but ideally one or more communities strategically located near the Monument will determine for itself to associate in a positive way with the Monument. The agencies intend to work closely with all communities surrounding the Monument.
33 / 001	I am writing this letter in support of Arco remaining the "Gateway to the Craters of the Moon". We have two major state highways joining together that give many tourists access to the Craters of the Moon. We need the designation of "Gateway to the Craters of the Moon" in order to help our community continue, on the flip side of the coin the Craters of the Moon needs us in order to give the tourists the most easily accessible and affordable route to the Craters with amenities as stated above, which in turn helps the entire State of Idaho.	Same response as previous comment.
126 / 001	EP A supports the revision of current management to encourage desired conditions in the Monument and better collaboration among agencies and partnerships outside the Monument in order to facilitate education for visitors. Consequently, EPA has rated the Preferred Alternative LO -Lack of Objections. This rating and a summary of our comments will be published in the Federal Register. A summary of the rating system we used in our evaluation of the Draft EIS is enclosed.	Thank you for your review and comment.
125 / 002	All of the Alternatives focus on "restoration" and preservation. BLM should formulate an alternative that works toward protecting Monument resources as well as meeting policy goals outlined in FLPMA Section 201 by focusing on the use of active, hands-on methods of resource management. Assuming that the BLM will forgo the policy goals outlined in FLPMA Section 201 and instead manage for "wilderness values", "desired future conditions" and "restoration", then the BLM should formulate an alternative that does so by focusing on the use of active, hands-on methods of resource management.	How resources management is achieved will be dealt with at the implementation-level planning.
127 / 002	Our seconded priority is in regard to maintaining and improving the facilities on the Monument. We believe it is important with limited budgets to concentrate on those improvements to the facilities at the existing entrance west of Arco. Arco has been and	Thank you for your comment.

Topic General

Letter No./ Comment No.	Comment	Response
	should continue to be the gateway to the Craters and the improvements should be directed towards the headquarters.	
73 / 002	In Chapter 2, Page 32, another Management Action states that an intergovernmental coordinating group would be considered to ensure consistency of this plan with other state and local plans. Section 202 (f) and Section 309 (e) of the Federal Lands Policy Management Act (FLPMA) provides that Federal, State, and local governments and the public be given adequate public notice and opportunity to comment on the formulation of standards and criteria for, and to participate in, the preparation and execution of plans and programs for the management of public lands. The establishment of such a group would help with this requirement.	Comment noted.
82 / 003	truly an ecologically unacceptable range of choices. The resulting EIS and Management Plan are thus fatally flawed, and most likely invalid at the outset. Under NEP A rules I believe, you must consider the FULL range of alternatives, and this plan certainly does not do that.	The Council on Environmental Quality (CEQ) guidelines for implementing NEPA requires federal agencies to analyze all "reasonable" alternatives that substantially meet the purpose and need for the proposed action. The purpose of the Monument Management Plan (Plan/EIS) is to provide for management of the Craters of the Moon National Monument and Preserve within the provisions of the Proclamation, and to meet the requirements of the Federal Land Policy and Management Act (FLPMA) and other laws and regulations. Because the Proclamation states that certain uses will not continue, and that other uses will continue consistent with federal laws and regulations, actions that do not comply with the Proclamation would not meet the purpose and need for the plan and therefore were not included in alternatives that were analyzed in this Environmental Impact Statement (EIS). Proclamation 7373 states: "Laws, regulations, and policies followed by the BLM in issuing and administering grazing permits or leases on all lands under the jurisdiction shall continue to apply with regard to the lands in the Monument administered by the BLM." Based on this language, a "no livestock grazing" alternative would not meet the purpose and need and would not be consistent with the Proclamation. The BLM's authority to manage grazing under existing laws, regulations, and policies would continue under all the alternatives considered. Livestock use authorizations, under any of the alternatives, would be adjusted consistent with evaluations identifying the need for changes in livestock use to meet the Idaho Standards for Rangeland Health and Guidelines for Livestock Grazing Management.

Topic General

Letter No./ Comment No.	Comment	Response
128 / 004	The stand of aspen that grows in Snowdrift Crater should be protected from livestock grazing and be interpreted with a sign explaining how the aspen got to growing there and about the historic gathering of ranchers which Secretary Babbitt convened to create the Monument. Despite all the times I have gone to Snowdrift Crater I have never heard how the aspens got there-was it only shade or is there moisture in the ground there?	A fence to protect the aspen stand in Snowdrift Crater was addressed in an Environmental Assessment prepared in 2004. This fence will be constructed in late 2004/early 2005. Interpretation of Snowdrift Crater will be considered in future planning. Thank you for your comment.
113 / 005	An explanation of the importance of the area to the livestock industry should be part of any interpretation/visitor understanding efforts. The Idaho Rangeland Resource Commission should be consulted in regards to various educational tools available that would tell folks the history of grazing in the area as well as the importance of the area to the industry.	Thank you for your comment. We will consider these points in the appropriate implementation- and project-level plans.
123 / 008	The EIS fails to address a broad range of alternatives that will fulfill the stated purpose and need "a comprehensive framework for managing public lands within the newly expanded Monument over the next 15 to 20 years", and to replace the fragmented plans. The DEIS also fails to identify what must be included as a key part of the Purpose and Need: to protect the significant values of the public lands identified in the Monument Proclamation.	As described on page 21, the four management alternatives analyzed in the DEIS were developed base on public input. As required by NEPA, they represent a reasonable range of alternatives that seek to address identified planning issues and management concerns. Protection of the Monument's values, a key element of the Management Plan, is specifically addressed on page 6 (Purpose and Significance of the Monument) and page 8 (Mission Goals) of the DEIS.
105 / 012	As with state and private land issues that require legislative solutions, so does any boundary adjustment to the Monument. Boundary adjustments should only be allowed when they are necessary to achieve a specific Monument management goal. The DEIS fails to identify any areas outside of the boundary that would add significant resources to the Monument as suggested in our scoping comments. For example, we would like to see the Monument boundary adjusted westward to include Sand Butte. Whether the entire boundary is elongated around Sand Butte, or whether Sand Butte is an island of Monument managed land should be evaluated. We respectfully request that this option be looked at during the next step in the Monument planning process with the intent of making a recommendation to Congress in the future.	The agencies acknowledge that as part of the process to develop this management plan they need to consider boundary adjustments. However, during the time the planning team was gathering comments from the public on issues that should be addressed in this planning process, this suggestion for adjusting the boundary to include Sand Butte was the only one submitted, other than for minor adjustments between NPS administered lands and BLM administered lands to better reflect grazing allotments. Refer to Appendix C for the agencies' recommendations on the latter. In considering boundary adjustments, the planning team referred to previous studies, including the Reconnaissance Survey – Expansion of Craters of the Moon National Monument (1989) and Management Alternatives - Expansion of Craters of the Moon National Monument (1990). The planning team concluded that it would be appropriate to consider what additional protection might be needed for Sand Butte during preparation of the Shoshone Resources Management Plan to begin in 2006 and will assure this information is passed along to the people

Topic General

Letter No./ Comment No.	Comment	Response
		responsible for the development of that plan. Another consideration is that Sand Butte is included within the Sand Butte Wilderness Study Area and does receive a degree of administrative protection while in this status.
165 / 013	Page 55 -Environmentally Preferred Alternative: The Service has concerns with the statement that Alternative D best meets the definition of the Environmentally Preferred Alternative. The proposed reclassification and maintenance of roads conflicts with Section 101 of the National Environmental Policy Act (NEP A) which burdens the federal government to "Preserve important 4 historical, cultural and natural aspects of our natural heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choice."	The selection of the environmentally preferred alternative is based upon a combination of factors outlined in Section 101 of NEPA as described on page 55 of the DEIS. The Proposed Plan/FEIS reduces the extent of the 660 foot Passage Zone corridors by over 30% and freezes the road system at current maintenance standards. No new roads or upgrades of existing roads will be done until a detailed transportation plan is completed.
165 / 016	It is our opinion that the alternative identified to best meet national environmental goals would be the one that maintains and protects the integrity of the largest section of landscape. As currently written, Alternative C provides this best. However, we see the opportunity to modify either Alternative C or D to incorporate the best actions under both alternatives.	Modifications have been made to Alternative D since it was presented in the Draft EIS as the preferred alternative. See Chapter 2 of the Proposed Plan/FEIS.
123 / 025	The Planning Team should revisit its failure to address hazardous materials. We ask that the BLM review and enter into the record the letters, and photos of the Smith allotment livestock well oil spill, junk petroleum product jugs, and other debris left littering and polluting public lands very near the east side of the Monument as a result of permittee well-related activities. Please also include the Appeal of this Decision in the record. Plus, sheep in particular may be coated with toxic pesticides used to kill vermin. Do these materials then accumulate in sheep bedding sites, or elsewhere? Do they become airborne in wind, or dust, and thus have the potential to become inhaled by visitors? Also here, a discussion of herbicide use, transport and application in the Monument, especially as it relates to the large-scale vegetation treatments that are proposed, is essential. Will the public be exposed to long-lasting and persistent chemicals like Tebuthiuron? Carcinogens like Tordon?	Although unsightly and unhealthy, the amounts of petroleum products at the Smith Well are not categorized as "hazardous materials" and do not lie within the Monument boundary. The agencies have no concrete data produced by scientific study to suggest pesticides used on livestock contaminate soils within the Monument to dangerous levels. Agency use of herbicide is subject to its own NEPA review and would be analyzed on a case-by-case basis.

Topic General

Letter No./ Comment No.	Comment	Response
123 / 029	Part of the management guidance must be undertaken as part of the DEIS process is conducting resource inventories and surveys. This is necessary to provide a baseline of information, as in many cases (livestock, cultural, vegetation condition, etc.) you have provided no information that allows a reasoned analysis of impacts of alternatives. For example, to determine how many acres need to be "restored" – as specified under various alternatives, you must know the condition and extent of degraded communities, where any projects may best focus on connectivity, etc. This is essential to determine if you have a reasonable range of alternatives.	The estimated restoration acreages were based on inventories conducted by BLM and The Nature Conservancy (see Jurs and Sands 2004). These inventories identified areas with poor, fair, and good ecological integrity. Areas identified as having poor ecological integrity, particularly those in Laidlaw Park, were identified as highest priority for restoration treatment. A generalized restoration map is included in the Proposed Plan/FEIS. The DEIS (p. 24, Desired Future Conditions and Management Actions for Natural Resources common to all alternatives) recognizes and provides for resource inventory and monitoring to provide a basis for management decisions. The agencies believe that the baseline information presented in the Draft Management Plan/Environmental Impact Statement is relevant and appropriate to the level of detail called for in the analyses. These analyses are necessarily broad to encompass the vast geographic extent of the Monument and the time period over which the Plan will be applied. Many of the management actions identified in the DEIS would be subject to additional impact analyses with the preparation of future implementation-level plans, for example site restoration plans. Such implementation-level projects and plans would include additional NEPA analysis and baseline information of sufficient detail to support identification and analysis of reasonably foreseeable adverse impacts on the human environment. If this information is not available at the time such plans are proposed, appropriate resource inventories and surveys would then be conducted by the agencies to obtain the necessary data.
132 / 058	Please explain in detail what is meant by "partnering" for interpretation and orientation outside the Monument. Are you planning on outsourcing or privatizing any government functions in the process? If so, please explain what these are, and what impacts this may have on the resources of the Monument, recreation for the general public, etc. What would costs be?	Simply stated, this "management action" calls for the agencies to be proactive in seeking opportunities with local communities and other agencies for providing interpretation and visitor orientation outside the boundaries of the Monument, minimizing the need to provide new facilities within the Monument.

Topic General

Letter No./ Comment No.	Comment	Response
123 / 060	Dubbing Alt. D "the environmentally preferred Alternative" is deceptive and misleading. The DEIS has both failed to conduct essential baseline information, undertake essential analysis, develop a reasonable range of alternative actions (ignoring any changes in grazing, distorting "benefits" of Alt. D, downplaying risks and harms). It makes no sense to "restore" if you don't address the root cause of ecological problems. Alternatives only evaluate a limited range of actions, and the Alternatives contain "poison pills" components. For example – the maze of roads that are falsely claimed necessary for fire suppression under all Alternatives, including Alt. C. There is no way the DEIS can determine that it is fulfilling responsibilities as trustees, ensuring safe, healthful, productive, aesthetic and culturally pleasing surroundings; attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable or unintended consequences; preserve important historic, cultural, and natural aspects of the natural environment and support diversity and choice; achieve a balance between population and resource use; enhance the quality of renewable resources and "approach the maximum attainable recycling of depletable resources", while failing to provide any controls of any kind on livestock grazing, which is the dominant land use.	The DEIS (p. 24, Desired Future Conditions and Management Actions for Natural Resources common to all alternatives) recognizes and provides for resource inventory and monitoring to provide a basis for management decisions. The estimated restoration acreages were based on inventories conducted by BLM and The Nature Conservancy (see Jurs and Sands 2004). These inventories identified areas with poor, fair, and good ecological integrity. Areas identified as having poor ecological integrity, particularly those in Laidlaw Park, were identified as highest priority for restoration treatment. A generalized restoration map is included in the Proposed Plan/FEIS. Land uses and environmental factors that lead to ecological degradation were addressed in the DEIS. Management guidance designed to avoid future problems is outlined in the "Common to All Alternatives" section (DEIS pp. 24-32) and in the descriptions of the alternatives. Additional management guidance, in response to public comments, has been added to the Proposed Plan/FEIS.
123 / 090	What are the industrial point sources of pollution at INEEL, and what pollutants do they produce?	A table indicating industrial point sources from the counties surrounding the Monument has been included in the air quality section of Chapter 3 of the Final EIS.
123 / 092	What radionuclides have been monitored here? When? How do their levels compare with background amounts of the radioactive elements? Please provide this data for public review in the SEIS. Please present the visibility and haze data, the radioactivity data, and other information on air pollution in more detail.	Additional information regarding radionuclides which have been monitored and a brief summary the results of that monitoring have been included in the air quality section (Chapter 3) of the Final EIS. Detailed summaries of these monitoring programs are available from the Idaho Department of Environmental Quality (http://www.oversight.state.id.us) and the U.S. Department of Energy (http://www.stoller-eser.com/index.htm). A summary of visibility data is presented in the air quality section of Chapter 3 of the Final EIS. Detailed visibility information is available on the internet at (http://vista.cira.colostate.edu/views/).

Topic General

Letter No./ Comment No.	Comment	Response
123 / 105	As part of this process, the DEIS must place a cap on the acreage that may be mined for gravel or other materials under the Free Use Permits. Where are these located, and how much gravel remains at them? How will more upgraded roads increase gravel demand?	Please see pages 124-126 of the DEIS for information on mineral materials within the Monument. On page 124, the DEIS states that the Proclamation withdrew all federal lands and interests in lands within the Monument from entry, location, selection, sale, leasing, or other dispositions. It goes on to state, new federal mineral leases or prospecting permits may not be issued, nor may new mining claims be located within the Monument. Please see pages 209-212 of the DEIS for a discussion of the impacts to mineral materials under various alternatives.
123 / 106	As part of this DEIS, the 2000 DEIS fire managementplan should be reviewed and updated to reflect the ever-increasing loss of sagebrush (die-off).	Protocols for fire management have been included in the proposed plan. These protocols, as well as management direction in the DEIS (p. 25), discuss protection of sagebrush steppe as a fire suppression priority. The protocols are consistent with those outlined in the 2004 South Central Idaho Fire Management Plan, which further defines resource protection within the Monument.
123 / 112	The aggressive pseudo-restoration theme of the DEIS,the failure to designate the Laidlaw ACEC, and the profound failure to address and provide goals and objectives to alter livestock grazing will guarantee that “interpretive themes” for visitor experience (DEIS at 131) of a “diverse population of plants and animals associated with a wide variety of volcanic habitats, a laboratory for diverse natural history, and especially – a “landscape of lava and sagebrush – one of the few remaining examples of what is natural” are not able to be met. If these are indeed what is intended, then designation of ALL remaining sagebrush habitats as ACECs, controls on grazing damage, and passive restoration must be part of all Alternatives. As part of the interpretation, under all alternatives, please provide visitor displays that describe the unraveling of the sagebrush ecosystem under livestock grazing (continuing to the present day) and fire.	Restoration efforts and livestock grazing would follow the resource management objectives defined in the DEIS. The commenter did not provide any new information or studies that would update the analysis of relevance and importance criteria, resulting in a determination that ACEC status is warranted. Management direction to protect the high quality vegetation resources in North Laidlaw Park, similar to that proposed for the nominated ACEC, was included in Alternative D (See DEIS p. 49, Vegetation, Including Special Status Species, and Fire Management for Alternative D; and pp. 340, Appendix G). Analysis of the relevance and importance criteria for establishment of North Laidlaw Park as an ACEC did not indicate that ACEC status is required for protection of the area. To further protect the area, the Preferred alternative was modified to increase the acreage of Pristine Zone and decrease the acreage of Passage Zone in North Laidlaw Park. Management direction under Alternative D (p. 49) states that the high ecological condition of North Laidlaw Park would be maintained and no new livestock water developments would be allowed.

Topic General

Letter No./ Comment No.	Comment	Response
123 / 115	DEIS at 135 and 136 fails to address the health risks associated with too many and confusing roads, use of chemical herbicides (more herbicide use accompanies status quo grazing, more upgraded roads and aggressive treatments), use of guard dogs by permittees, use of other chemicals on public lands in livestock operations (please review our letters and Appeal of the Smith allotment pipeline and the mess of oil and other chemicals polluting and littering BLM lands in association with a livestock watering operation in this allotment that includes portions of the east side of the Monument.	Page 135 specifically states that "Due to the size of the Monument and the complexity of the road system, navigation can be confusing. The BLM maintains a system of directional signs on the Monument; however many roads and ways have appeared through-out the years, making map-based navigation difficult." Guard dog interaction with visitors has not been considered a frequent problem influencing visitor safety. Page 136 refers to guard dog safety hazards to visitors. Oil spills, chemical pollutants, and litter associated with livestock operations or any other use is prohibited and typically mediated once reported. We would appreciate reports of any such activity in the future.
123 / 122	We are glad to see you have incorporated darkness provisions. However, there are no limitations or guidance for lighting of facilities provided here.	Detailed guidance for lighting of facilities is beyond the scope of this plan. Such guidance will be incorporated into each specific implementation plan for any new facilities or upgrades to existing facilities. Effects of such lighting will be examined in the NEPA documents accompanying such plans.
123 / 125	Why have you decided to define the cumulative impacts analysis area separately under each "resource type"? What is meant by resource type? How is livestock grazing a "resource type"?	As described on page 148 of the DEIS, the area for analysis of cumulative impacts changes by resource topic because projects that make up the cumulative impact scenario do not affect all resources equally.

Topic General

Letter No./ Comment No.	Comment	Response
123 / 129	The DEIS can not constrain your analysis of impacts for each alternative to the land area included in the Proclamation. For example, the grazing allotments that impinge on the Monument also cover vast surrounding areas. Fuels projects (like the Big Desert Fuelsbreak EA) have the potential to accelerate weed spread (on visitor tires, livestock) on the eastern edge of the Monument – including into Monument lands. Other developments, such as the huge new livestock pipeline constructed on contiguous lands must be examined for the likelihood of increasing weed infestations, accelerating degradation of remaining sagebrush habitats, and loss of wildlife populations shard with the Monument. How do such activities elevate the importance of taking strong and decisive management actions to protect Monument lands? Likewise, the importance of the values of lands in the proposed Laidlaw Park ACEC (and indeed all sagebrush lands remaining in the Monument) must be viewed and evaluated in a regional light. Relative scarcity must be examined.	All implementation- and project-level plans will comply with and be guided by the Final EIS. Restoration efforts and livestock grazing would follow the resource management objectives defined in the DEIS. The commenter did not provide any new information or studies that would update the analysis of relevance and importance criteria, resulting in a determination that ACEC status is warranted. Management direction to protect the high quality vegetation resources in North Laidlaw Park, similar to that proposed for the nominated ACEC, was included in Alternative D (See DEIS p. 49, Vegetation, Including Special Status Species, and Fire Management for Alternative D; and pp. 340, Appendix G). Analysis of the relevance and importance criteria for establishment of North Laidlaw Park as an ACEC did not indicate that ACEC status is required for protection of the area. To further protect the area, the preferred alternative was modified to increase the acreage of Pristine Zone and decrease the acreage of Passage Zone in North Laidlaw Park. Management direction under Alternative D (p. 49) states that the high ecological condition of North Laidlaw Park would be maintained and no new livestock water developments would be allowed.
123 / 130	A July 12, 2004 Shoshone BLM EA describes “the area southwest of Sand Butte Crater has relatively few shrubs and a history of large wildfires… cheatgrass .. rush skeletonweed …, a state-listed noxious weed is common …”. This area is located just west of Craters – wind typically blows from this direction, and will readily transport the small, light wind-dispersal-adapted rush skeletonweed seeds into livestock or road disturbed areas of the Monument. Cumulative impacts of degradation of neighboring lands must be assessed. Interestingly, this small EA describes mule deer migration corridors, sage grouse lek locations, etc. All of this type of basic information must be presented in the DEIS – and it is not. That is the only way an integrated, comprehensive look at indirect, cumulative or synergistic impacts of Alternatives and management actions can be taken. Under cumulative impacts, the DEIS must also consider any potential energy projects, fire project or other actions or developments that may affect Monument lands or wildlife populations.	Numerous projects make up the cumulative impact scenario that is described on pages 148 – 151 of the DEIS. These projects were analyzed in conjunction with the impacts of each alternative in the DEIS to determine if they would have any additive or interactive effects on a particular resource. The DEIS acknowledges that roads, vehicles, human, and animals are known vectors to the spread of noxious weeds (DEIS Ch. 3, Discussion on Noxious and Exotic Species, p. 92). Cumulative affects of known or foreseeable impacts on vegetation resources within a 50 miles radius of the Monument were analyzed for vegetation resources can be found in the DEIS, pp. 162-171.

Topic General

Letter No./ Comment No.	Comment	Response
123 / 131	DEIS at 148. If data is not available for wildlife, vegetation, weeds, etc. it must be collected as part of the DEIS process. Otherwise, you will never be able to understand the amount of fragmentation that may result from activities under this plan. This further demonstrates the need for preparation of a Supplemental EIS. What in the world have agencies been doing over the course of several years. As previously described, even basic information like mule deer migration corridor location is omitted from the DEIS. Impacts of past agency projects that have affected lands –for example, the disastrous prescribed fire and sagebrush control projects of the past – must be assessed. Estimate how much land in the five-county areas is now dominated by cheatgrass or crested wheatgrass.	Collecting all the data that is currently unavailable is cost prohibitive.
123 / 135	It is unclear whether the “Impairment of Resources” section applies only to NPS lands or to all lands. Please explain clearly.	As described on page 151 of the DEIS, the prohibition on impairment applies to the resources and values of the Monument. The supporting statute, the Organic Act (16 USC 1), as amended, applies to the NPS, but it does not specifically address lands by ownership.
123 / 145	This same type of minimizing impacts, myopically constraining analysis to a narrow, confined and inadequate range of alternatives, and then deeming impacts only “minor” or “moderate”, without any science-based analysis or rationale, pervades the analysis of all elements of the environment in the DEIS, and further demonstrates the need for preparation of a Supplemental EIS.	Thank you for your comments
123 / 148	Alternative A is essentially the no action alternative. DEIS at 160 claims it would have no major adverse impacts on a resource or value whose conservation is necessary to fulfill the purposes identified in the legislation, or key to natural or cultural integrity. Yet, status quo livestock grazing, trampling and livestock facilities have resulted in widespread fire and large-scale weed invasion, loss of sage grouse leks and migratory bird population declines (see Laidlaw EA), drowning of migratory birds, mammals and even prairie falcons, and many other adverse impacts. You have failed to assess the serious environmental effects of these ongoing activities.	The effects of continued livestock grazing under Alternative A are addressed on pages 159, 164, 172, 177, 213, and elsewhere in the DEIS.

Topic General

Letter No./ Comment No.	Comment	Response
123 / 178	BLM's "planning criteria" for vegetation and several other elements ignores mention of FLPMA, which provides for designation of ACECs, and specifically allows for lands not to all be abused at the same level. The agency "planning criteria" fails to address livestock grazing in any substantive way whatsoever. DEIS at 299 admits that BLM is required to give priority to designation and protection of ACECs as part of land use planning. Instead, here, BLM buries the ACEC in only one Alternative, and provides little analysis at all of the ACEC and how it may help protect the values of the Monument.303. The failure to address livestock grazing violates BLM's planning criteria for sustainability.	Please refer to DEIS Appendix G, pp. 337-341. The ID team followed the appropriate process in analyzing the values in North Laidlaw Park to determine if the area qualified for ACEC status. The proposed ACEC was included and analyzed in Alternative C, the logical alternative to include the potential protection provided by the proposed ACEC. Further, to demonstrate a commitment to maintaining the high ecological condition of the area, protective measures were included in Alternative D, the preferred alternative, that limit livestock developments, specifically to maintain the light use that the area has received for years and that has resulted in the current condition (DEIS p. 49). Additional protective measures have been included in the Proposed Plan/FEIS, including decreasing the acreage of Passage Zone and increasing the acreage of Pristine Zone in Laidlaw Park. By comparing the effects of managing the area as an ACEC in Alternative C with the effects of managing the area with the protective measures in Alternative D we found no advantage in designating the area an ACEC and that we can achieve the same results with the protective measures in Alternative D. Therefore we concluded that it is unnecessary to designate the area as an ACEC.
123 / 184	We request that NPS withdraw from a joint EIS venture with BLM, as BLM's recent examples of this. A Supplemental EIS must be prepared that contains essential baseline data and that can be obtained.	The Proclamation directed the NPS and BLM to work together to manage the Monument.

Topic Administration

Letter No./ Comment No.	Comment	Response
63 / 001	The current preferred alternative, Alternative D, should be abandoned. If not, Alternative D requires substantial revisions in order to meet the Proclamation goals set forth by President Clinton's action under the Antiquities Act to expand the Craters of the Moon National Monument.	Each of the alternatives affords the high degree of protection for Monument resources required by Proclamation 7373. As the preferred alternative in the DEIS, and now the proposed alternative in the Final Management Plan, Alternative D has been revised to reflect many of the comments received from the public during the review process.

Topic Visual

Letter No./ Comment No.	Comment	Response
123 / 120	Upgrading roads plus leaving nearly all other roads open will ensure that the goal "to perpetuate scenic vistas and open landscape for future generations is not met. Roads are not part of scenic vistas. Plus, upgrading roads means more places for livestock facilities – as livestock and infrastructure are permitted in the "passage" zone that will result fork upgrading. How does livestock grazing and livestock facilities alter the visual landscape? Please describe the current environment, and compare between Alternatives in a Supplemental EIS. How do existing "treatments" mar the visual landscape? How do they otherwise affect recreational experiences?	A supplemental EIS is not warranted. Please see Chapter 4 for a discussion of impacts.
123 / 173	Visual Resources. DEIS at 230-235. You can not claim that pseudo-restoration using pipelines, fences, etc.), and not part of the natural landscape. would significantly mar the visual lands.	In the case of restoration efforts, structures such as fences are used to protect the areas being restored. While fences may not match the characteristic natural landscape, they are a necessary tool in the restoration effort, a main purpose of which is to restore the viewshed to its characteristic natural landscape.

Topic Grazing & Recreation

123 / 136	If human visitors have so drastically affected spatter cones (loss of 2 feet in elevation), how much have livestock affected geologic resources and soil erosion in the Monument? How much greater are livestock impacts in the sagebrush lands than visitor impacts to these resources/values?	The spatter cones are in the developed NPS portion of the Monument which is closed to grazing. Most of the geologic features in the Monument are void of vegetation therefore the likelihood of livestock affecting the geologic resources is low.

Topic Grazing & Access/Travel

Letter No./ Comment No.	Comment	Response
123 / 138	While the analysis claims that grazing use of some areas may be limited, under the Preferred Alternative and upgraded road and MORE "passage" areas, more livestock grazing may be extended close to geologic features, resulting in significantly greater impacts. The analysis here of soils impacts overlooks the link between grazing disturbance, cheatgrass and weed spread, and fire – thus grazing is an indirect cause of fire-caused erosion and deposition of soils. More upgraded roads would mean larger disturbed rights-of-way, more wind-blown soil, and keeping all roads open along with upgrades will increase fire danger, with the result being more wind erosion. More upgraded roads would mean less control on looting of geological surface features.	There is not a mandate to upgrade roads in Alternative D (see desired future conditions and management actions as listed for Alternative D on page 50). In the Proposed Plan/FEIS, Alternative D will have some additional miles of road closure because of adopting a larger Pristine Zone and the amount of Passage Zone within the Monument has also been reduced. The DEIS dose not mandate upgrading roads for more passage, nor does it mean more livestock grazing may be extended close to geologic features. In fact roads could closed to prevent resource damage to geologic features.

GLOSSARY

a′a: A Hawaiian term for basaltic lava flows that are typically rough and jagged with a clinkery surface.

Acre-Foot: Amount of water that will cover 1 acre to a depth of 1 foot.

Active Preference (grazing): Current authorized use including livestock grazing and conservation use. Active use may constitute a portion, or all, of permitted use. Active use does not include temporary non-use or suspended use of forage within all or a portion of an allotment.

Adaptive Management: A type of natural resource management that implies making decisions as part of an ongoing process. It is a continuous process of planning, implementing, monitoring, evaluating, and incorporating new information into strategies to meet goals and objectives. It also provides a model for adjusting goals and objectives as new information develops and public desires change.

Adit: A nearly horizontal passage in an underground mine, driven from the surface, by which a mine may be entered, ventilated, or dewatered.

Age Class: An age grouping of trees according to an interval of years, usually 20 years. A single age class would have trees that are within 20 years of the same age, such as 1-20 years or 21-40 years.

Aggradation: The building up of land surfaces by sedimentation or deposition of mineral matter.

Air Quality: Class I Area – Areas designated under the Clean Air Act that are afforded this highest level of protection from air pollutants; generally consist of wilderness areas, national parks, and wildlife refuges.

Class II Area: Areas not designated included as Class I; additional air pollutant inputs may be permitted up to certain limits.

Airshed: A geographic area that shares the same air.

Allotment: An area allocated for livestock use by one or more qualified grazing permittees including prescribed numbers and kinds of livestock under one plan of management.

Allotment Management Plan (AMP): A documented program that applies to livestock grazing on public lands, prepared by consulting, cooperating, and coordinating with the permittee(s), lessee(s), or other interested publics.

All-Terrain Vehicle (ATV): Small three-wheel and four-wheel recreational motor vehicles capable of operating in rugged terrain.

Alluvium: Any sediment deposited by flowing water, as in a river bed, floodplain, or delta.

Animal Unit: One cow, one wild horse, two burros, or five sheep.

Animal Unit Month (AUM): The amount of forage required to sustain one mature cow or the equivalent (e.g., five sheep or five goats), based on an average daily forage consumption of 26 pounds of dry matter per day. The equivalent animal units for other ungulate species, based on a weight conversion (3 percent body weight per day), are: 10.5 for antelope; 7.6, deer; 2.1, elk; 1.2, moose; 0.9, wild horses; and 5.2, sheep.

Annual Vegetation: Plants that complete their life cycles and die in 1 year or less.

Appropriate Management Response (AMR): Specific actions taken in response to a wildland fire to implement protection and fire use objectives.

> **Category A:** private lands, BLM facilities, and other areas with values where fire would not be desired.
>
> **Category B:** areas where a variety of appropriate fire suppression techniques would be applied to meet the resource objectives specified in the Plan/EIS and other site-specific activity plans.

Aquifer: A saturated, permeable sediment or rock that can transmit significant quantities of water under hydraulic gradients.

Area of Critical Environmental Concern (ACEC): An area of public lands where special management attention is required to protect and prevent irreparable damage to important historic, cultural, or scenic values; fish and wildlife resources; or other natural systems or processes; or to protect humans from natural hazards.

Basalt: Fine-grained, dark-colored igneous rocks that are either intrusive or extrusive.

Beneficial Use: A use of water, such as domestic, municipal, agricultural, mining, stock watering, recreation, wildlife, or power generation, that provides a benefit.

Best Management Practice (BMP): Practices based on current scientific information and technology which, when applied during implementation of management actions, ensure that adverse impacts are minimized. BMPs are applied based on site-specific evaluation and represent the most effective and practical means to achieve management goals for a given site.

Biological Diversity (Biodiversity): The variety of life and its processes, and the interrelationships within and among various levels of ecological organization. Federal resource management agencies must examine the implications of management actions and development decisions on regional and local biodiversity.

Biological Integrity: The ability to support and maintain a balanced, integrated, adaptive community of organisms having a species composition, diversity, and functional organization comparable to that of the natural habitat of the region.

Biological Soil Crust: A complex mosaic of mosses, lichens, algai, cyanobacteria, and fungi that occupies the soil surface in arid and semiarid plant communities. These organisms weave through the soil and essentially glue the surface particles together, forming a protective coating against erosive forces.

Blister: A blister is formed by the swelling of the crust that occurs as a result of the expansion of gas or vapor beneath a flow; typically about 1 meter (3.3 feet) in diameter and hollow.

Block Lava: Lava with a surface of angular blocks and forms from very dense lava.

Bomb: Pyroclastic fragments greater than 64 millimeters (2.5 inches) in diameter that were molten or plastic at the time of ejection. The shape of a bomb is determined by the viscosity of the magma, velocity and length of flight, the rate at which the lava cooled, the rate of expansion of gases, and the type of deformation that occurred upon impact.

Breadcrust Bomb: A crust that cooled during flight such that as gases within it continued to expand, the crust cracked much like bread rising in an oven.

Broadcast Burn: A prescribed fire that burns a designated area. These controlled fires can reduce wildfire hazards, improve forage for wildlife and livestock, or encourage successful regeneration of trees.

Brood Rearing: Caring for young birds hatched at one time.

Butte: A detached low mountain or high mound rising abruptly from the general level of the surrounding plain; applied to peculiar elevations in the Rocky Mountain Region.

Cairns: Stones intentionally piled by humans.

Cambrian Period: From 500 million to about 544 million years ago, in which marine invertebrates were common.

Candidate Species: Species not protected under the Endangered Species Act but under consideration by the U.S. Fish and Wildlife Service for inclusion on the list of federally threatened or endangered species.

Carbonate: A salt or carbonic acid, like limestone.

Carrying Capacity: The character of use that can be supported over a specific time by an area developed at a certain level without causing excessive damage to either the physical environment or the experience of the visitor.

Cation: An electrically charged particle (ion) with a positive charge.

Cheatgrass: (Bromus tectorum L, downy brome) An exotic annual grass, native to Eurasia and the Mediterranean, which can dominate disturbed ground in shrub-steppe ecosystems of the western United States and Canada.

Chemical Control: The use of pesticides and herbicides to control pests and undesirable plant species.

Cenozoic: The most recent era of geologic history (65 million years ago until the present) during which the earth's modern landforms, animals, and plants came into being.

Cinder: Uncemented, glassy, vesicular (holes created by escaping gas bubbles), pyroclastic material. Cinder can be thought of as "volcanic froth."

Cinder Cone: A steep, conical hill that is formed by the accumulation of cinders, spatter, and other pyroclastic material.

Cinder Garden: Gardens that occur on cinder deposits with little to no soil development.

Class of Livestock: The species of domestic livestock – cattle and sheep.

Climax Vegetation: The final vegetation community and highest ecological development of a plant community that emerges after a series of successive vegetational stages. The climax community perpetuates itself indefinitely unless disturbed by outside forces.

Collector Roads: These roads serve small land areas and are usually connected to a larger road or state highway.

Community: An assemblage of plant and animal populations in a common spatial arrangement.

Consultation, Coordination, and Cooperation: A process prescribed by the Public Rangelands Improvement Act of involving the permittee(s), lessee(s), federally recognized Native American tribes, and interested publics in the development of allotment management plans and other management programs on public lands. The process also includes trust responsibilities to federally recognized Native American tribes.

Consumptive Use: Recreation activities which consume natural resources. Hunting and fishing are regarding as consumptive recreation because wildlife species are consumed. Rockhounding is consumptive because nonrenewable resources are removed.

Cow-pie Bombs: Cow-pie bombs, also known as cow-dung and pancake bombs, form from very fluid lava that is still plastic when it lands, causing it to flatten upon impact; some still have a liquid core upon impact.

Crater: A circular depression in a volcano that formed from a gradual accumulation of pyroclastic material around the vent, an explosive eruption, or collapse.

Critical Habitat, Designated: Specific parts of an area occupied by a federally listed threatened or endangered plant or animal at the time it is listed that contain physical or biological features essential to the conservation of the species or that may require special management or protection. Critical habitat may also include specific areas outside an area occupied by a federally listed species if the Secretary of the Interior determines that these areas are essential for the conservation of the species.

Cultivar: A race or variety of a plant that has been created or selected intentionally and maintained through cultivation.

Cultural Landscape: A geographic area, including both cultural and natural resources and the wildlife

or domestic animals therein, associated with a historic event, activity, or person or exhibiting other cultural or aesthetic values.

Cultural Property: The definite location of a past human activity, occupation, or use identifiable through field inventory, historic documentation, or oral evidence. Cultural properties include prehistoric and historic archaeological remains, or architectural sites, structures, objects, or places with important public and scientific uses.

Cultural Resource: The fragile and nonrenewable remains of human activity that are found in historic districts, sites, buildings, and artifacts and that are important in past and present human events.

Cultural Resource Inventory: Section 110 inventories – surveys done in response to the federal proactive responsibility to protect cultural resources

> **Section 106 inventories:** done in response to requirements of the National Historic Preservation Act – 3 types:
>
> **Class I:** literature review and file search
>
> **Class II:** intensive pedestrian survey of a sample of an area
>
> **Class III:** intensive pedestrian survey of entire area

Cultural Resource Management Plan (CRMP): A brief activity plan in which the broad determinations (management objectives) made in a resource management plan (RMP) are developed into specific management decisions. CRMP development has two decision products: 1) the allocation of all of the planning area's cultural resources to categories (BLM Manual Section 8111.2); and 2) the establishment of related protection and information gathering priorities.

Cumulative Impacts: The impact on the environment that results from the incremental impact of the action when added to other past, present, or reasonably foreseeable future actions, regardless of what agency or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. Cumulative impacts can result from similar projects or actions, as well as from projects or actions that have similar impacts (40 CFR 1508.7).

Current Annual Growth: The amount of forage produced by a plant in one growing season.

Deferment: Nongrazing, either by delay or discontinuance of grazing, from the beginning of plant growth until the seed is set or the equivalent stage of vegetative reproduction.

Desired Future Condition: Used to describe the future condition of resources to meet management objectives. Desired future condition is based on ecological, social, and economic considerations during the land and resource management planning process.

Desired Plant Community: The plant community which provides the vegetation attributes required for meeting or exceeding RMP vegetation objectives. The desired plant community must be within an ecological site's capability to produce these attributes through natural succession, management action, or both.

Developed Recreation: Recreation that requires facilities that, in turn, result in concentrated use of the area. For example, skiing requires ski lifts, parking lots, buildings, and roads. Campgrounds require roads, picnic tables, and toilet facilities.

Dipteran: Insects having usually a single pair of functional wings (anterior pair) with the posterior pair reduced to small knobbed structures and mouth parts adapted for sucking or lapping or piercing (i.e., true flies).

Dispersed Recreation: Recreation that does not occur in a developed recreation site, such as hunting, backpacking, and scenic driving.

Diversity (Species): (1) The absolute number of species in a community, species richness; and (2) a

measure of the number of species and their relative abundance in a community; low diversity refers to few species or unequal abundance, high diversity to many species or equal abundance.

Easement: A right or privilege one may have on another's land.

Ecological Succession: An ecosystem's gradual evolution to a stable state or climax. If through the ability of its populations and elements, an ecosystem can absorb changes, it tends to persist and become stable through time.

Ecosystem: A functioning system comprised of a community of animals, plants, and bacteria and its interrelated physical and chemical environment.

Ecotone: A transition area between two distinct habitats, where the ranges of the organisms in each bordering habitat overlap, and where there are organisms unique to the transition area.

Endangered Species: Any animal or plant species in danger of extinction throughout all of a significant portion of its range. These species are listed by the U.S. Fish and Wildlife Service under provisions of the Endangered Species Act.

Endemic: Having a natural distribution confined to a particular geographical region.

Environmental Assessment (EA): A concise public document that a federal agency prepares under the National Environmental Policy Act (NEPA) to provide sufficient evidence and analysis to determine whether a proposed agency action would require preparation of an Environmental Impact Statement (EIS) or a Finding of No Significant Impact. A federal agency may also prepare an EA to aid its compliance with NEPA when no EIS is necessary or to facilitate preparation of an EIS when one is necessary.

Environmental Impact Statement (EIS): A detailed written statement that is required by the National Environmental Policy Act (NEPA) for a proposed major federal action significantly affecting the quality of the human environment. The findings from the document are published in a Record of Decision (ROD).

Environmental Justice: The fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. Fair treatment means that no group of people, including racial, ethnic, or socioeconomic groups, should bear a disproportionate share of the negative environmental consequences resulting from operation or the execution of federal programs and policies. Executive Order 12898 directs federal agencies to make achieving environmental justice part of their missions by identifying and addressing disproportionately high and adverse effects of agency programs, policies, and activities on minority and low-income populations.

Eolian Processes: Wind erosion, transport, and deposition.

Ephemeral: Short-lived; usually only one day.

Erosion: The wearing away of land surface either by natural weathering processes (including water, wind, or ice) or human or animal activities.

Erosion Blanket: Material such as straw, jute matting, or rock that is applied to the land surface to minimize erosion of soil particles caused by the impact of rain drop splash and by flowing water.

Ethnographic Resource: A site structure, object, landscape, or natural resource feature assigned traditional legendary, religious, subsistence, or other significance in the cultural system of a group traditionally associated with it.

Exotic Plant Communities: Assemblages of plants that are not indigenous to the area, such as cheatgrass, spotted knapweed, and leafy spurge.

Exotic Species: An animal or plant species that is not a part of an area's original fauna or flora.

Extirpated: Completely gone from an area; destroyed completely.

Fault: A fracture or fissure in the earth's surface.

Fauna: The animal life of an area.

Fecal Coliform/Fecal Streptococcus: Types of bacteria found in animal waste.

Finding of No Significant Impact (FONSI): A public document issued by a federal agency briefly presenting the reasons why an action for which the agency has prepared an Environmental Assessment does not have potential for a significant effect on the human environment and, thus, will not require preparation of an Environmental Impact Statement.

Fire Condition Class (FCC): A classification for vegetation communities relative to the departure of the fire regime (frequency and severity of fire) from historic conditions. There are three fire condition classes ranging from FCC1 (low departure) to FCC3 (high departure).

> **FCC1** represents low departure from the historic fire regime. Key ecosystem components include a healthy mosaic of various successional stages for each vegetation type. For example, these components would include sagebrush steppe communities with native perennial grass and forb understories, or aspen or Douglas fir communities with trees of variable age, openings to allow tree regeneration, and an abundance of understory grasses and forbs.
>
> **FCC2** represents moderate departure from the historic fire regime, resulting in some risk of more frequent fire return intervals and/or greater levels of severity.
>
> **FCC3** represents high departure from the historic fire regime, resulting in high risk of resource loss due to frequent fire return intervals and/or high levels of severity. An example of FCC3 is an area that was formerly low-elevation sagebrush steppe that is currently dominated by an understory or monoculture of cheatgrass.

Fire Cycle: The average time between fires in a given area.

Fire Fountain: A rhythmic vertical fountain-like eruption of lava.

Fire Suppression: All work and activities associated with fire extinguishing operations, beginning with the discovery and continuing until the fire is completely extinguished.

Fissure Caves: A cave formed from a fissure, i.e., an elongated fracture or crack related to volcanic action.

Fissure/Vent: An elongate fracture or crack at the surface from which molten rock and volcanic gases escape onto surface.

Floodplain: Level streamside land that may be subject to flooding.

Flora: The plant life of an area.

Forage: Vegetation of all forms available and of a type used for animal consumption.

Forb: A broad-leaved plant (herb) whose stem does not produce woody, persistent tissue and generally dies back at the end of each growing season, such as arrowleaf balsamroot.

Four-Wheel Drive (4WD): Trucks, cars, or sport utility vehicles with high clearance and the ability to operate off pavement, on rugged terrain, as well as on highways.

Fragmentation: The process of dividing habitats into smaller and smaller units until their utility, as habitat is lost.

Fuel Loading: Accumulation of natural combustible materials (fuel) that could burn in a fire.

Fugitive Dust: Particulate matter emissions that do not pass through a stack, chimney, vent, pipe, or similar opening.

Gateway Communities: Towns in the areas surrounding the monument, that often serve as entrance points for visitors to the monument.

Geographic Information System (GIS): GIS is both a database designed to handle geographic data as well as a set of computer operations that can be used to analyze the data. In a sense, GIS can be thought of as a higher order map.

Geomorphic Processes: Processes that change the form of the earth, such as volcanic activity, running water, and glacial action.

Geomorphology: A subdiscipline of geography, concerned with the study of the form and development of the landscape, includes such specializations as sedimentology.

Government-to-Government Consultation: The active, affirmative process between agencies of the Federal government and Tribal governments under the laws of the United States. Tribal governments are considered domestic sovereignties with primary and independent jurisdictions over tribal lands. Consultation consists of: 1) identifying and seeking input from appropriate Native American governing bodies, community groups and individuals; and 2) considering their interests as a necessary and integral part of the decision making process. The aim of consultation is to involve affected Native Americans in the identification of issues and the definition of the range of acceptable management options.

Grazing Management Practices: Techniques used to manage livestock and include season, duration (amount of the time grazing occurs), intensity of use, numbers of livestock, kind of livestock, and distribution (e.g., salting, herding, and water development).

Grazing Plan or Program: A combination of grazing management and/or facilities used to ensure an expectation of meeting or making significant progress toward meeting the Standards for Rangeland Health.

Great Rift: The Great Rift volcanic rift zone is a belt of open cracks, eruptive fissures, shield volcanoes, and cinder cones, which varies in width between approximately 1 and 5 miles. It begins north of the Monument, approximately 6 miles from the topographic edge of the Snake River Plain, in the vent area of the Lava Creek flows located in the southern Pioneer Mountains. The Great Rift extends southeasterly from the Lava Creek vents for more than 50 miles to somewhere beneath the Wapi Lava Field.

Ground Fire: A fire that burns along the forest floor and does not affect trees with thick bark or high crowns.

Groundwater: Water that has percolated downward from the ground surface through the soil pores.

Habitat: The natural abode of a plant or animal, including all biotic, climatic, and soil factors affecting life.

Herbaceous: Pertaining to or characteristic of an herb (fleshy-stem plant) as distinguished from the woody tissue of shrubs and trees.

Hornito: A rootless spatter cone (fed by lava from within an underlying lava tube) that has a steep sided, inverted cone shape and is formed from an accumulation of pyroclastic materials.

Hydrologic Cycle: The circulation of water in the atmosphere, on the surface of the earth, in the soil, and in the underlying rocks.

Hydrology: The science of dealing with the study of water on the surface of the land, in the soil and underlying rocks, and in the atmosphere.

Igneous Rock: Rock, such as granite and basalt, that has solidified from a molten or partially molten state.

Indicator: Components or attributes of a rangeland ecosystem that can be observed and/or measured that provides evidence of the function, productivity, health and/or condition of the ecosystem.

Indigenous (species): Any species of wildlife native to a given land or water area by natural occurrence.

Inflation Structure: An inflation structure occurs along a crack where swelling of underlying lava causes one side to become uplifted relative to the other, whether due to degassing or influx of more lava.

Inholding: A non-federal parcel of land that is completely surrounded by federal land.

Integrated Pest Management (IPM): The use of all appropriate technologies and management techniques to bring about an effective degree of pest prevention and suppression in a cost-effective and environmentally sound manner (as defined by the World Health Organization Conference, Geneva, 1985). This definition also applies to Integrated Weed Management (IWM).

Invasive Species: In this document, the definition for this term is "a plant or animal species (typically non-native) that rapidly spreads into or displaces a desirable native species or community." [Exception: An "invasive species", as defined in Executive Order 13112, is a species that is (1) non-native (or alien) to the ecosystem under consideration and (2) whose introduction causes or is likely to cause economic or environmental harm or harm to human health. Invasive species can be plants, animals, and other organisms (e.g., microbes)].

Irretrievable: One of the categories of impacts mentioned in the National Environmental Policy Act to be included in statements of environmental impacts. An irretrievable effect applies to losses of production or commitment of renewable natural resources. For example, while an area is used as a ski area, some or all of the timber production there is irretrievably lost. If the ski area closes, timber production could resume; the loss of timber production during the time that the area was devoted to winter sports is irretrievable. However, the loss of timber production during that time is not irreversible, because it is possible for timber production to resume if the area is no longer used as a ski area.

Irreversible: A category of impacts mentioned in statements of environmental impacts that applies to non-renewable resources, such as minerals and archaeological sites. Irreversible effects can also refer to effects of actions that can be renewed only after a very long period of time, such as the loss of soil productivity.

Karst: An area underlain by limestone in which erosion has formed sinkholes, fissures, caverns, and underground streams.

Key Habitats: Key habitats contain generally large-scale, intact sagebrush steppe arrears that provide sage grouse habitat during some portion of the year.

> **Source Habitat:** Source habitats are a subset of Key habitat that support concentrated sage grouse populations. Source habitats are also commonly referred to as population strongholds. Data indicate that sage grouse populations in Source habitats have been generally stable or increasing since the drought of the early 1990s.
>
> **Isolated Habitat:** Isolated habitats are a subset of Key habitat that support relatively small sage grouse populations. Isolated habitats are separated from other Key habitat by developed land or unsuitable habitat, such as farmland, forests, or grassland.

Kiosks: A stall set up in a public place where one can obtain information, e.g., tourist information.

Kipuka: < kee' poo ka > Hawaiian word meaning "key", or opening such as for a door. A mound of older land, usually covered by vegetation, which is surrounded by a younger lava flow.

Lacustrine: Relating to or living near lakes.

Landscape: A large land area composed of interacting ecosystems that are repeated due to factors such as geology, soils, climate, and human impacts.

Late Pleistocene-Holocene: Beginning about 11,000 years ago, the end of the glacial period ("Ice Age") due to the multiple expansion and retreat of glaciers.

Lava: Lava is magma (molten rock) that has erupted onto the earth's surface; also used to refer to magma after it has solidified.

Lava Curb: Lava curbs form when blobs of lava floating in a river of lava accumulate on the edges of the flow and begin to build out. If the curbs build out far enough on either side to connect to each other and create a crust, they create a new lava tube roof.

Lava Field: A large contiguous area of lava formed from a lava flow.

Lava Flow: A lava flow can be described as an outpouring of molten rock onto the earth's surface forming a river or sheet.

Lava Fountains: A vertical eruption of lava from a vent or along a fissure. Lava fountains can reach a height of 2000 ft.

Lava Lake: A lake of molten lava, usually basaltic, contained in a vent, crater, or broad depression of a shield volcano.

Lava Toe: Small, bulbous extensions of lava that form at the front of pahoehoe flows by breaking through crusts on the flow front.

Lava Tube: Lava tubes form when the surface of flowing lava congeals forming a crust. The lava underneath the solidified crust continues to flow, now insulated from the cooling air. When the lava eruption ceases, and if the tube drains, a large tubular cave may be left behind.

Leasable Mineral: A mineral such as oil shale, oil and gas, phosphate, potash, sodium, geothermal resources, and all other minerals that may be developed under the Mineral Leasing Act of 1920, as amended.

Lee (or Leeward) Side: The side of something that is sheltered from the wind.

Lek: An assembly area where birds, especially sage grouse, carry on display and courtship behavior.

Levee: A natural or manmade feature of the landscape that restricts movement of water into or through an area.

Licensed Vehicle: A motor vehicle operating under a current state registration.

Lichen: A mutualistic association of a fungus and photosynthetic organism.

Limited Designation (motorized travel): BLM designation meaning that some restrictions apply to motorized travel on a specified route or in a specified area.

Lithic Scatter: Pertaining to or composed of stone scatter; a form of an archaeological resource.

Litter: Dead plant or animal material on the soil surface.

Livestock Developments; Livestock Management Facilities: Physical facilities, such as fences, water developments, and corrals that are used to handle and control livestock.

Loess: Unconsolidated, silt-sized particles with accessory clay and sand particles that are deposited primarily by the wind. Loess that has filtered down into cracks in the lava and between the cinders provides the growth medium for vegetation.

Magma: Molten rock beneath the earth's surface.

Management Framework Plan (MFP): Bureau of Land Management land use plan, predecessor to the Resource Management Plan (RMP).

Mechanical Treatment: Use of mechanical equipment for seeding, brush management, and other management practices.

Mechanized Vehicle: Mechanical transport designed to replace human labor and/or human physical capabilities. Mechanized vehicles include mountain bikes, horse drawn wagons, big game carriers, handcarts, and hang gliders.

Mesic: Conditioned by a temperate moist climate; neither dry nor wet; pertaining to conditions of medium moisture supply.

Metamorphic: Pertaining to, produced by, or exhibiting certain changes that minerals or rocks may have undergone since their original deposition, especially applied to the recyrstallization which sedimentary rocks have undergone through the influence of heat and pressure, after which they are called metamorphic rocks.

Microbiotic Crust: Community of non-vascular primary producers that occur as a "crust" on the surface of soils and made up of a mixture of algae, lichens, mosses, and cyanobacteria (bluegreen algae).

Midden: The accumulation of debris and domestic waste products resulting from human use, especially an accumulation of shells or of cinders, bones, and other refuse on the supposed site of the dwelling places of prehistoric tribes. The long-term disposal of refuse can result in stratified deposits, which are useful for relative dating.

Mineral Materials: Materials such as common varieties of sand, stone, gravel, pumice, pumicite, and clay, that are not obtainable under the mining or leasing laws but that can be acquired under the Mineral Materials Act of 1947, as amended.

Mineral Rights: Ownership of all minerals, including all rights needed for access, exploration, development, mining, ore dressing, and transportation.

Mineral Soil: Soil that consists mainly of inorganic material, such as weathered rock, rather than organic matter.

Mineral Withdrawal: A withdrawal of public lands that are potentially valuable for leasable minerals. This precludes the disposal of the lands except with a mineral reservation, or unless the lands are found to not be valuable for minerals.

Minority: Defined by the U.S. Census as individuals who are members of the following population groups: American Indian or Alaskan Native; Asian or Pacific Islander; Black, not of Hispanic origin; or Hispanic.

Mitigation Measures: Constraints, requirements, or conditions imposed to reduce or eliminate an anticipated impact to environmental, socioeconomic, or other resource value from a proposed action.

Modification: A fundamental change in the provisions of a lease stipulation, either temporarily or for the term of the lease. A modification may include an exemption from or alteration to a stipulated requirement. The modification may or may not apply to all other sites within the leasehold to which the restrictive criteria apply.

Motorized Vehicle: Vehicle powered by an engine, usually internal combustion.

Multiple Use Management: The definition of multiple use is defined in the Federal Policy and Management Act of 1976 as follows: "The management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people; making the most judicious use of the land for some or all of these resource or related services over areas large enough to provide sufficient latitude for periodic adjustments in use to conform with changing needs and conditions; the use of some land for less than all of the resources; a combination of balanced and diverse resource uses that takes into account the long-term needs of future generations for renewable and nonrenewable resources, including, but not limited to, recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific and historic values; and 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 the uses that will give the greatest economic return or the greatest output."

Museum Collections: Objects, specimens, and archival and manuscript collections that are important resources providing valuable information about processes, events, and interactions among people and the environment.

National Ambient Air Quality Standards (NAAQS): The allowable concentrations of air pollutants in the ambient (public outdoor) air specified in 40 CFR 50. NAAQS are based on the air quality criteria and divided into primary standards (allowing an adequate margin of safety to protect the public health) and secondary standards (allowing an adequate margin of safety to protect the public welfare).

National Environmental Policy Act of 1969 (NEPA): The federal law that established a national policy for the environment and requires federal agencies to (1) become aware of the environmental ramifications of their proposed actions, (2) fully disclose to the public proposed federal actions and provide a mechanism for public input to federal decision making, and (3) prepare environmental impact statements for every major action that would significantly affect the quality of the human environment.

National Register of Historic Places (NRHP): The official list, established by the National Historic Preservation Act, of the nation's cultural resources worthy of preservation. The NRHP lists archaeological, historic, and architectural properties (districts, sites, buildings, structures, and objects) nominated for their local, state, or national significance by state and federal agencies and approved by the National Register Staff.

National Wild and Scenic Rivers System: Established by the Wild and Scenic Rivers Act of 1958 to protect rivers and their immediate environments that have outstanding scenic, recreation, geologic, fish and wildlife, historic, cultural, and other similar values and are preserved in free-flowing conditions. The system provides for the designation of three types of rivers: Recreation, Scenic, and Wild.

Native American Graves Protection and Repatriation Act (NAGPRA): Requires Federal Agencies to inventory human remains and associated funerary objects in existing Federal Museum collections and to provide culturally affiliated tribes with the inventory of collections. NAGPRA also requires repatriation, on request, to the culturally affiliated tribes.

Native American Tribe: Any indigenous cultural group in the conterminous United States that the Secretary of the Interior recognizes as possessing tribal status, i.e. federally recognized (listed annually in the Federal Register).

Native Species: Plants or animals indigenous to the area.

Natural Quiet: Refers to the state of having only natural sources of sound: wind, rustling leaves, water, and animal calls, for example.

Naturalness: In Section 2(c) of the Wilderness Act, the wilderness characteristic in which an area "generally appears to have been affected primarily by the forces of nature, with the imprint of people's work substantially unnoticeable."

Night Sky: A sky free of artificial light sources and related light pollution.

Non-native Species: Plants or animals that are not indigenous to the area. (See also "Exotic Species.")

Nonpoint Source Pollution: Pollution whose source is not specific in location. The sources of the discharge are dispersed, not well defined, or constant. Rainstorms and snowmelt often make this type of pollution worse. Examples include sediments from logging activities and runoff from agricultural chemicals.

Non-renewable Resource: A resource whose total quantity does not increase measurably over time, so that each use of the resource diminishes the supply.

Nonvascular Plant: Plants that do not have specialized tissues for conducting water and synthesized foods, such as a moss or liverwort.

Notice of Intent: A notice in the Federal Register of intent to prepare an Environmental Impact Statement on a proposed action.

Noxious Weeds: According to the Federal Noxious Weed Act (Public Law 93-629), a weed that causes disease or has other adverse effects on humans and their environment and is therefore detrimental to public health and the agriculture and commerce of the United States. This is a legal designation by the state of Idaho.

Nutrient Cycle: The cyclical process by which plants and animals use chemical compounds and elements in the soil, water, and atmosphere to produce plants and animals and the decomposition of plants and animals to return chemical compounds and elements to the soil, water, and air for future use.

Obligate: Essential, necessary, unable to exist in any other state, mode, or relationship. See "Sagebrush Obligate."

Off-Highway Vehicle (OHV): Any motorized vehicle designed for or capable of cross-country travel over lands, water, sand, snow, ice, marsh, swampland, or other terrain.

Off-Highway Vehicle Management Designations: Designations apply to all off-road vehicles regardless of the purposes for which they are being used. Emergency vehicles are excluded. The OHV designation definitions have been developed in cooperation with representatives of the U.S. Forest Service, National Park Service, and BLM state and district personnel.

> **Open:** Designated areas and trails where OHVs may be operated. The BLM designation meaning that motorized travel on a specific route or in a specific area is permitted.
>
> **Limited:** Designated areas and trails where the use of an OHV is subject to restrictions, such as limiting the dates and times of use (seasonal restrictions); limiting use to designated roads and trails; and limiting use to existing roads and trails. Combinations of restrictions are possible.
>
> **Closed:** Designated areas, roads, and trails where the use of an OHV is permanently or temporarily prohibited. Emergency use of vehicles is allowed.

Pahoehoe: A Hawaiian term for a basaltic lava flow that has a smooth, billowy, or ropy surface.

Paleoecology: The study of the relationship of extinct organisms or groups of organisms to their environments.

Paleontological Resources (Fossils): The physical remains of plants and animals preserved in soils and sedimentary rock formations. Paleontological resources are important for understanding past environments, environmental change, and the evolution of life.

Paleontology: The study of the fossil record of past geological periods and of the phylogenetic relationships between ancient and contemporary plant and animal specials.

Palustrine: Non-tidal inland wetlands dominated by terrestrial and emergent vegetation.

Particulate Matter: Fine liquid or solid particles suspended in the air and consisting of dust, smoke, mist, fumes, and compounds containing sulfur, nitrogen, and metals, typically averaging one micron or smaller in diameter.

Perennial Vegetation: Plants that have life cycle of 3 or more years.

Permitted Use: The forage allocated by, or under the guidance of, an applicable land use plan for livestock grazing in an allotment under a permit or lease and is expressed in animal unit months (AUMs).

Permittee: A person or organization legally permitted to graze a specific number and class of livestock on designated areas of public land during specified seasons each year.

pH: A measure of acidity or hydrogen ion activity. Neutral is pH 7.0. All values below 7.0 are acidic, and all values above 7.0 are alkaline.

Phreatic: Of or relating to groundwater.

Pictograph: Aboriginally painted designs on natural rock surfaces. Red ochre is the most frequently used pigment and natural or abstract motifs may be represented.

Pioneer Plants: Those that establish themselves first on disturbed areas or bare soil.

Pit Crater: Also known as a volcanic sink, is a circular-shaped depression with steep to vertical walls that formed by collapse of the ground that results from the removal of support such as from the withdrawal of the underlying magma.

Playa: A dried-up, flat-floored area representing the bottom of a shallow, undrained lake basin in which water accumulates and is often quickly evaporated.

Pleistocene Age: The latest major geological epoch from 11,000 to 2 million years ago, the time of human evolution. Also known as the "Ice Age" due to the multiple expansion and retreat of glaciers.

Pre-existing Use: Land use that may not conform to a zoning ordinance but existed prior to the enactment of the ordinance.

Prescribed Burning: Controlled application of fire to wildland fuels in either their natural or modified state, under specified environmental conditions which allow the fire to be confined to a predetermined area and at the same time to produce the fire line intensity and rate of spread required to attain planned resource management objectives.

Prescribed Fire: Controlled application of fire to natural fuels under conditions of weather, fuel moisture, and soil moisture that would allow confinement of the fire to a predetermined area and, at the same time, would produce the intensity of heat and rate of spread required to accomplish certain planned benefits to one or more objectives to wildlife, livestock, and watershed values. The overall objectives are to employ fire scientifically to realize maximum net benefits at minimum environmental damage and acceptable cost.

Prescribed Natural Fire: Same as "Wildlife Fire Use."

Pressure Plateau: A pressure plateau forms from a sill-like injection of new lava beneath the crust of an earlier flow that has not completely solidified.

Pressure Ridge: Elongated uplift of the congealing crust of a lava flow believed to be caused by the pressure of the underlying, still flowing, lava.

Public Land: Any land or interest in land owned by the United States and administered by the Secretary of the Interior through the Bureau of Land Management, without regard to how the United States acquired ownership, except for (1) land located on the Outer Continental Shelf and (2) land held for the benefit of American Indians, Aleuts, and Eskimos.

Pumice: Pumice is a light colored, frothy volcanic rock having the composition of rhyolite. It is often buoyant enough to float on water.

Pyroclastic: Pyroclastic is a term that refers to volcanic rock material that is formed by a volcanic explosion or by ejection from a volcanic vent.

Quartzite: A granular stone formed of fused quartz grains. Commonly white, yellow or red. Used as a raw material, for flaked stone tools.

Radiocarbon Dating: An absolute dating method based on the radioactive decay of Carbon-14 contained in organic materials.

Rafted Block: Volcanic fragment that was caught up in a lava flow and detached from its source, such as a piece of crater-wall carried off much like an iceberg.

Range Management: The art and science of planning an directing range use intended to yield the sustained maximum animal production and perpetuation of the natural resources.

Rangeland: Land on which the potential natural vegetation is predominantly grasses, grass-like plants, forbs, or shrubs suitable for grazing or

browsing. It includes natural grasslands, savannas, many wetlands, some deserts, tundra, and areas that support certain forb and shrub communities.

Rangeland Condition: The present status of a unit in terms of specific values or potential.

Rangeland Health: The degree to which the integrity of the soil and ecological processes of rangeland ecosystems is maintained.

Rangeland Improvements: Any activity or program on or relating to rangelands that is designed to improve forage production, change vegetation composition, control patterns of use, provide water, stabilize soil and water conditions, and enhance habitat for livestock, wildlife, and wild horses and burros. Rangeland improvements include land treatments (e.g., chaining, seeding, burning, etc.), water developments, fences, and trails.

Raptor: Bird of prey, such as the eagle, falcon, hawk, owl, or vulture.

Record of Decision (ROD): A document signed by a responsible official recording a decision that was preceded by the preparing of an Environment Impact Statement.

Reclamation: The reconstruction of disturbed ecosystems by returning the land to a condition approximate or equal to that which existed prior to disturbance, or to a stable and productive condition compatible with the land use plan. The immediate goal of reclamation is to stabilize disturbed areas and protect both disturbed and adjacent undisturbed areas from unnecessary degradation.

Recreation Visitor Day: Any recreational activity taking place within a 24-hour period, or portion thereof, for each individual recreating on public lands.

Rehabilitation: The activities necessary to repair damage or disturbance caused by wildfire or the fire suppression activity. Rehabilitation treatments can include herbicide use to control weeds and seeding with desirable vegetation.

Residual Vegetation: Amount, cover, and species composition of the vegetation on a site after it has been grazed for a period of time.

Resource Advisory Councils (RACs): Advisory councils appointed by the Secretary of the Interior and consisting of representatives of major public land interest groups (commodity industries, recreation, environmental, and local area interests) in a state or smaller area. RACs advise the Bureau of Land Management, focusing on a full array o f multiple use public land issues. RACs also help develop fundamentals for rangeland health and guidelines for livestock grazing.

Resource Management Plan (RMP): A land use plan as described by the Federal Land Policy and Management Act to guide resource management and use allocation on public lands and resources administered by the BLM.

Rest: Nongrazing for a specified period of time, generally a full growing season up to one full year.

Restoration: Actions that proactively treat degraded vegetation with the intent of meeting resource management objectives. Restoration treatments can include prescribed fire, herbicide use to control weeds, and seeding with desirable vegetation.

Restoration Habitats: Potential restoration habitats have the potential to provide sage grouse habitat in the future. These are sagebrush steppe that have been converted to grassland or woodland or are in the successional process of converting to woodland. These areas are located in close proximity to Key or Source habitats. Data indicate that sage grouse historically occupied these areas and may still utilize some sporadically, such as during migrations. Restoration habitats have a high likelihood of being reoccupied if habitat suitability improves. The following are potential restoration habitats:

> **Restoration Type 1 (R1):** Sagebrush-limited areas with acceptable understory conditions in terms of perennial grass species composition and may include native and seeded grass rangelands. These are important areas to protect from

wildfire and encourage sagebrush establishment and retention. Inexpensive management treatments may be needed (e.g., sagebrush and/or forb seedings).

Restoration Type 2 (R2): Existing sagebrush cover in these areas may or may not be adequate to meet the needs of sage grouse, but understory herbaceous conditions are poor. Undesirable plants such as cheatgrass, medusa head rye, or other exotics are common to dominant.

Restoration Type 3 (R3): Key or Source habitat with juniper or other conifer encroachment. Sagebrush is usually present but is being threatened or reduced by conifer expansion. Opportunities exist for improving habitat through appropriate fire management response, prescribed fire, or chemical or mechanical means.

Revegetation: The reestablishment and development of a plant cover by either natural or artificial means, such as re-seeding.

Ribbon Bombs: Ribbon bombs are strands of fluid lava ejected from a vent that takes the shape of thin twisted "ribbons."

Rift Zone: Area characterized by an open volcanic fissure.

Right-of-Way (ROW): A permit or an easement that authorizes the use of public land for certain specified purposes, commonly for pipelines, roads, telephone lines, electric lines, and reservoirs. It is also the reference to the land covered by such an easement or permit.

Right-of-Way Corridor: A parcel of land that has been identified by law, Secretarial Order, through a land use plan, or by other management decision as being the preferred location for existing and future right-of-way grants and suitable to accommodate one type of right-of-way or one or more rights-of-way which are similar, identical, or compatible.

Riparian Area/Habitat: A form of wetland transition between permanently saturated wetlands and uplands. The areas exhibit vegetation or physical characteristics that reflect permanent surface or subsurface water influence.

Riparian Habitat: Riparian habitat is defined as an area of land directly influenced by permanent (surface or subsurface) water and has visible vegetation or physical characteristics reflective of permanent water influence.

Riparian Vegetation: Plants adapted to moist growing conditions along streams, waterways, ponds, or other permanent water body.

Road: A transportation facility used primarily by vehicles having four or more wheels, documented as such by the owner and maintained for regular and continuous use. Includes the following classes:

Class A Roads are generally are paved and have a surface of asphalt, concrete, or similar continuous material. In addition to U.S. Highway 20/26/93, the only Class A roads are the loop drive, spur roads and associated parking areas in the original NPS Monument. Class A roads are only found in the Frontcountry Zone.

Class B Roads are improved roads constructed with a natural or aggregate surface, and they may have berms, ditches or culverts. Regular maintenance allows passage by standard passenger and commercial vehicles such as cars, light trucks and some heavy trucks. Within the Monument, seasonal conditions and lack of snow removal may render these roads impassable. Class B roads are found primarily in the Passage Zone.

Class C Roads have an unimproved natural surface and may be either constructed or established over time by repeated passage of vehicles. The natural surface may be dirt, sand, or rock. A minimal amount of maintenance, if any at all, is limited primarily to spot surface grading to allow vehicle passage within the original road corridor. Class C roads accommodate a much smaller range of vehicles than Class B roads, usually high clearance two-wheel drive

and four-wheel drive vehicles. Seasonal conditions or wet weather may render these roads impassable at any time. Class C roads are found primarily in the Passage and Primitive zones.

Class D Roads are primitive roads that were not constructed, but established over time by the passage of motorized vehicles. These roads receive no maintenance or grading. Occasional emergency repairs or limited maintenance may be performed for resource protection and administrative purposes. These roads are generally referred to as "two-tracks." The condition of these roads varies from sometimes passable by a passenger car, to only suitable for high clearance four-wheel drives vehicles. Seasonal conditions or wet weather may render these roads impassable at any time. Class D roads are found primarily in the Primitive Zone.

Rootless Vent: See Hornito.

Route: A road-like feature by vehicles having two, three, four, or more wheels, but not declared a road by the owner and which receives no maintenance to guarantee regular and continuous use.

Sacred Site: Any specific, discrete, narrowly delineated location on Federal land that is identified by a Native American Tribe, or Native American individual determined to be appropriately authoritative representative of a Native American religion, as sacred by virtue of its established religious significance to, or ceremonial use by, a Native American religion.

Sagebrush Obligates: Restricted to sagebrush habitats during the breeding season or year round.

Sagebrush Steppe Community: A semi-arid plant community that is characterized by a predominance of big sagebrush and other sagebrush species, plus grasses and forbs.

Saleable Minerals: Minerals that may be sold under the Material Sale Act of 1947, as amended. Included are common varieties of sand, stone, gravel, and clay.

Scoping: The ongoing process to determine public opinion, receive comments and suggestions, and determine issues during the environmental analysis process. It may involve public meetings, telephone conversations, and/or letters.

Scenic River: A river or section of a river that is free of impoundments and whose shorelines are largely undeveloped but accessible in places by roads.

Seasonal Utilization: The amount of utilization that has occurred before the end of the growing season.

Season-Long Use: The term season-long use or passive, continuous grazing means grazing throughout the growing period, with little or no effort to control the amount of distribution of livestock use in area/pasture/allotments.

Section 7 Consultation: The requirement of Section 7 of the Endangered Species Act that all federal agencies consult with the U.S. Fish and Wildlife Service or the National Marine Fisheries Service if a proposed action might affect a federally listed species or its critical habitat.

Section 106 Consultation: Also known as the 36 CFR 800 process. Discussions between a federal agency official and the Advisory Council on Historic Preservation, State Historic Preservation Officer, and other interested parties concerning historic properties that could be affected by a specific undertaking. Section 106 is the portion of the National Historic Preservation Act that outlines the procedure. The procedure is codified in 36 CFR 800.

Section 110: The section of NHPA that requires Federal Agencies to complete cultural resources surveys and reports for all its lands and existing projects.

Sedimentary Rocks: Rocks, such as sandstone, limestone, and shale, that are formed from sediments or from transported fragments deposited in water.

Seedlings: A tree grown from seed that has not reached a height of 3 feet or a diameter of 2 inches.

Sensitive Species: Plant and animal species not yet officially listed but that are undergoing status review for listing on the U.S. Fish and Wildlife Service official threatened and endangered list; species whose populations are small and widely dispersed or restricted to a few localities; and species whose numbers are declining so rapidly that official listing may be necessary. Sensitive species are listed by the Bureau of Land Management State Directors.

Shelly Pahoehoe: A type of pahoehoe lava that forms from highly gas-charged lava, often near vents or tube skylights, with a surface that consists of broken blisters, small open lava tubes, and thin crusts. In the Craters of the Moon Lava Field, surface crusts are typically about 10 centimeters (3.9 inches) thick.

Shield Volcano: A broad, gently sloping volcano that has a flattened dome shape, not unlike that of a knight's shield. Shield volcanoes usually cover a large area and form from overlapping and interfingering, low viscosity lava flows.

Significant Progress: Measurable and/or observable (i.e., photography, use of approved qualitative procedures) changes in the indicators that demonstrate improved rangeland health.

Silt: Earthy sediment of fine particles of rock and soil suspended in and carried by water.

Slabby Pahoehoe: A type of pahoehoe with a surface that consists of a jumbled arrangement of jagged plates, or slabs, of pahoehoe that were rafted, sheared, tilted, upturned, overturned, and heaped on each other.

Spatter: An accumulation of very fluid pyroclasts (ejected material).

Spatter Cone: A spatter cone is a low, steep sided cone formed from the accumulation of spatter ejected from a vent or fissure.

Spatter Rampart: A broad, elongate embankment of spatter that is built by a curtain of fire and forms along either side of a fissure.

Special Management Areas: An area containing one or a combination of unique resources or values that receive more intensive management (e.g., ACECs, Special Recreation Management Areas, Wild and Scenic Rivers, etc.).

Special Status Species: Wildlife and plant species that are either federally listed as threatened or endangered, proposed threatened or endangered, candidate species, state-listed as threatened or endangered, or listed by a Bureau of Land Management State Director as sensitive or determined priority.

Speleothem: A mineral deposit of calcium carbonate that precipitates from solution in a cave.

Spindle Bomb: Volcanic bombs with a twisted shape; spindle bombs form from blobs of fluid lava that often take on a smooth stoss side (front side), a rougher lee side (backside) marked by ribs and fluting caused by frictional resistance to air, and have prominent, usually twisted, projections on either side that form as ribbon bombs separate.

Spiny Pahoehoe: A type of pahoehoe with a surface that consists of elongate vesicles that formed from stretching of very viscous lava, giving it a surface texture of small ridges or spines.

Squeeze Up: A bulbous blob of viscous, molten lava that was forced, by pressure, up through a fracture or opening in solidified lava.

Subsistence Use: The customary and traditional use by Native Americans of renewable resources on the public lands.

Successional Stage: A stage of development of a plant community with another. Conditions of the prior plant community (or successional stage) create conditions that are favorable for the establishment of the next stage.

SUM06 Statistic: The sum of hourly average ozone concentrations greater than 0.06 parts per million; used to assess potential air quality impacts relating to ozone levels.

Sustainable: The yield of a natural resource that can be produced continually at a given intensity of management is said to be sustainable.

Sustainability: The ability of an ecosystem to maintain ecological processes and functions, biological diversity, and productivity over time.

Suspended Animal Unit Months (AUMs): Temporary withholding from active use, through a decision issued by the authorized officer or by agreement, of part or all of the permitted use in a grazing permit or lease.

Sustained Productivity of the Range: Maintaining the production capability of the rangeland for long periods of time (100 years or more).

Tachylyte: A black, green or brown volcanic glass that forms when basaltic magma is rapidly chilled.

Tailings: The waste matter from ore after the extraction of economically recoverable metals and minerals.

Taxa: A group of organisms sharing common characteristics in varying degrees of distinction and constituting one of the categories in taxonomic classification, such as a phylum, order, family, genus, or species.

Take: As defined by the Endangered Species Act, "to harass, harm, pursue, hunt, shoot, wound, kill, capture, or collect, or attempt to engage in any such conduct."

Tension Fractures: Tension fractures result from stresses that pull rocks apart.

Tephra: Volcanic ash.

Tertiary Period: The earlier (5 million to 12 million years ago) of the two geologic periods in the Cenozoic era of geologic time.

Threatened and Endangered Species: As defined in the Endangered Species Act of 1973, as amended (Public Law 93-205; 87 Stat. 884), an endangered species means "any species which is in danger of extinction throughout all or a significant portion of its range" and threatened species means "any species which is likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range." Whether a species is threatened or endangered is determined by the following factors: (1) present or threatened destruction, modification, or curtailment of its habitat or range; (2) overutilization for commercial, sporting, scientific, or educational purposes; (3) disease or predation; (4) inadequacy of existing regulatory mechanisms; or (5) other natural or human-made factors.

Total Dissolved Solids (TDS): Total concentration of salts in solution. High TDS solutions can change the chemical nature of water, exert varying degrees of osmotic pressure, and often become lethal to aquatic life.

Traditional Lifeway Values: Values that are important for maintaining a group's traditional system of religious belief, cultural practice, or social interaction. A group's shared traditional lifeway values are abstract, nonmaterial, ascribed ideas that cannot be discovered except through discussions with members of the group. These values may or may not be closely associated with definite locations.

Traditional Cultural Properties: A cultural property that is eligible for inclusion in the National Register of Historic Places because of its association with a living community's cultural practices or beliefs that (a) are rooted in that community's history and (b) are important in maintaining the community's continuing cultural identity.

Trail: A linear feature constructed (or established by past use), with a single tread designated, designed, and intended for travel primarily by foot, beasts of burden, two-wheeled vehicles (e.g., mountain bikes and motorcycles), and various special equipment or machinery generally used for individual travel. Facilities used by jeep or four-

wheel drive are typically classified as "roads" or "ways." Trails are sometimes referred to as "single track."

> **Class 1 Trails** are restricted to non-motorized/non-mechanized travel (wheelchairs are allowed). Examples of permitted forms of travel include foot travel, pack animal, and horseback. Examples of prohibited forms of travel on Type 1 trails include mountain bikes and all motorized vehicles. Class 1 trails may be further restricted, for example, to foot travel only.
>
> **Class 2 Trails** are open to motorized/mechanized travel in addition to foot travel, pack animal, horseback, and other forms of passage. Examples of prohibited forms of travel include any vehicle with a footprint wider than an 18-inch tread (all-terrain vehicles, four-wheelers, and four-wheel-drive vehicles).

Treaty: A formal agreement between the United States and one or more Native American tribes. Typically, these arrangements ceded lands to the United States, reserving certain rights, privileges, and/or lands to the Native American signatories.

Treaty Right: Rights of land use retained by Native American tribes through treaty with the United States; such rights commonly include, but may not be limited to, hunting, fishing and gathering.

Tree Mold: A tree mold or lava tree forms when lava flows around a tree and chills, leaving behind a "mold" of the space occupied by the tree, or impression of the charred wood. Tree molds can also be horizontal if the tree was knocked down by the lava flow.

Trust Responsibility (as so referred to as fiduciary responsibility): The trust responsibility of the United States, executed through the Secretary of the Interior, to uphold obligations of the Federal Government to federally recognized Native American tribes. Court decisions have interpreted this responsibility to extend to all Federal agencies. This obligation requires a reasonable and good faith effort to identify and consider, and to carry out programs in a manner sensitive to and consistent with, Native American concerns and tribal government planning and resource management programs.

Trust Resource: Refers to those resources such as plants, animals and fish that Federally Recognized Tribes make use of when exercising their treaty rights on public lands; not to be confused with trust assets, which are those things held in trust by the federal government and managed solely for the benefit of tribes, such as trust lands, mineral estate on reservation, or grazing receipts.

Tuff: A compacted pyroclastic deposit of volcanic ash and dust that may contain up to 50 percent sediments such as sand or clay.

Tumulus/Tamuli: A tumulus is a dome or mound shaped structure on the crust of a lava flow caused by pressure from the difference in rates of flow beneath the crust. Unlike a volcanic blister a tumulus is a solid structure.

Turbidity: Muddiness created by stirring up sediment or having foreign particles suspended.

Two-Wheel Drive (2WD): Vehicle clearance generally lower than with a 4WD and not designed to travel off pavement.

Understory: Herbaceous plant components, including grasses and forbs, that grow beneath the overstory in stand of woody shrubs; or the herbaceous and woody shrubs growing beneath the overstory in a stand of trees.

Ungulates: Hoofed animals, including ruminants but also deer and elk.

Untrammeled: Not subject to human controls and manipulations that hamper the free play of natural forces. A word describing desired wilderness conditions used in the Wilderness Act.

Utilization: The portion of forage that has been consumed (or destroyed) by livestock, wild horses, wildlife, and insects during a specified period. The term is also used to refer to a pattern of such use (43 CFR 4100.0-5).

Valid Existing Rights: Locatable mineral development rights that existed when the Federal Land Policy and Management Act (FLPMA) was enacted on October 21, 1976. Some areas are segregated from entry and location under the Mining Law to protect certain values or allow certain uses. Mining claims that existed as of the effective date of the segregation may still be valid if they can meet the test of discovery of a valuable mineral required under the Mining Law. Determining the validity of mining claims located in segregated lands requires BLM to conduct a validity examination and is called a "valid existing right" determination.

Vascular: Having vessels for circulating or transmitting plant or animals fluids.

Variety Class: A way to classify landscapes according to their visual features. This system is based on the premise that landscapes with the greatest variety or diversity have the greatest potential for scenic value.

Vegetation Treatment: Changing the characteristics of an established vegetation type for the purpose of improving rangeland forage or wildlife habitat resources. Treatments are designed for specific areas and differ according to the area's suitability and potential. The most common land treatment methods alter the vegetation by chaining, spraying with pesticides, burning, and plowing, followed by seeding with well-adapted desirable plant species.

Vesicle: A cavity or variable space in lava formed by the entrapment of a gas bubble while the lava was solidifying.

Visitor Day: Twelve visitor hours which one or more persons may aggregate continuously, intermittently, or simultaneously.

Visitor Use: Passive or active recreational activity on public land, which may involve either consumptive or non-consumptive use of the resources.

Visual Resource: A part of the landscape important for its scenic quality. It may include a composite of terrain, geologic features, or vegetation.

Visual Resource Management (VRM): A tool used by the Bureau of Land Management to help characterize and preserve the quality of visual resources. VRM classes are determined on the basis of overall scenic quality, distance from travel routes, and sensitivity to change:

> **Class I:** Provides primarily for natural ecological changes only. It is applied to wilderness areas, some natural areas, and similar situations where management activities are to be restricted.
>
> **Class II:** Changes in the basic elements caused by a management activity may be evident in the characteristic landscape, but the changes should remain subordinate to the visual strength of the existing character.
>
> **Class III:** Contrasts to the basic elements caused by management activity may be evident and begin to attract attention in the landscape, but the changes should remain subordinate in the existing landscape.
>
> **Class IV:** Contrasts may attract attention and be a dominant feature in the landscape in terms of scale, but the change should repeat the basic element of the characteristic landscape.

Volcanic Rift Zone: An elongate system of crustal fractures associated with underlying dike complexes.

Volcano: A vent in the earth's surface through which magma, gases, or ash may erupt. The structure produced by ejected material.

Watershed: An area that collects and discharges runoff to a given point. It is often used synonymously with drainage basin or catchment.

Way: A road-like feature used by vehicles having four or more wheels, but not declared a road by the owner and which receives no maintenance to guarantee regular and continuous use.

Wayside: The edge of a road, path, or way (e.g., roadside).

Wetland: Areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and which under normal circumstances support a prevalence of vegetation typically adapted for life in saturated soil conditions. Typical wetlands include marshes, shallow swamps, sloughs, lakeshores, bogs, wet meadows, river overflows, mud flats, and riparian areas.

Wilderness Area: An area of federal land designated by the United States Congress and defined by the Wilderness Act of 1964 as a place "where the earth and its community of life are untrammeled by man, where man himself is a visitor who does not remain." Designation is aimed at ensuring that these lands are preserved and protected in their natural condition. Wilderness areas, which are generally at least 5,000 acres or more in size, offer outstanding opportunities for solitude or a primitive and unconfined type of recreation; such areas may also contain ecological, geological, or other features that have scientific, scenic, or historical value.

Wilderness Inventory: A written description of resource information and accompanying map of those public lands that meet the wilderness criteria as established under Section 603(a) of the Federal Land Policy and Management Act and Section 2(c) of the Wilderness Act.

Wilderness Study Area (WSA): An area designated by a federal agency as having wilderness characteristics, thus making it worthy of consideration by congress for wilderness designation. While congress considers whether to designate a WSA as a permanent wilderness, the federal agency managing the WSA does so in a manner as to prevent impairment of the area's suitability for wilderness designation.

Wildfire: An unwanted wildland fire, regardless of ignition source, which is unplanned, has escaped control, or does not meet management objectives and therefore requires a suppression response.

Wildland Fire: Any nonstructure fire, other than prescribed fire, that occurs in the wildland.

Wildland Fire Use (also called "Wildland Fire for Resource Benefit"): A naturally ignited fire allowed to burn under designated conditions to meet resource management objectives.

Withdrawal: Removal or "withholding" of public lands from operation of some or all of the public land laws (settlement, sale, mining, and or mineral leasing). An action which restricts the use or disposal of public lands, segregating the land from the operation of some or all of the public land and/or mineral laws and holding it for a specific public purpose. Withdrawals may also be used to transfer jurisdiction of management to other federal agencies.

Xenolith: An inclusion of a foreign body of rock in an igneous rock.

Xeriscaping: Landscaping with drought-tolerant vegetation.

ABBREVIATIONS AND ACRONYMS

ºF	degrees Fahrenheit
µg/m3	micograms per cubic meter
ACEC	Area of Critical Environmental Concern
AGI	Areas of Geologic Interest
AMP	Allotment Management Plan
APHIS	Animal and Plant Health Inspection Service
ATV	all-terrain vehicle
AUM	animal unit month
BLM	Bureau of Land Management
BMP	Best Management Practice
CBA	Choosing by Advantages
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CRMP	Cultural Resource Management Plan
DEIS	Draft Environmental Impact Statement
DOE	United States Department of Energy
EA	Environmental Analysis
EIS	Environmental Impact Statement
EPA	United States Environmental Protection Agency
ESA	Endangered Species Act
ESR	emergency stabilization or rehabilitation
ESRP	Eastern Snake River Plain
FAA	Federal Aviation Administration
FCC	Fire Condition Class
FCRPA	Federal Cave Resources and Protection Act
FEIS	Final Environmental Impact Statement
FHWA	Federal Highway Administration

FLPMA	Federal Land Policy and Management Act
FMDA	Fire Management Direction Amendment
FMP	Fire Management Plan
FY	fiscal year
GIS	Geographic Information System
GMP	General Management Plan
GPS	Global Positioning System
I	Interstate
ICBEMP	Interior Columbia Basin Ecosystem Management Project
ICDC	Idaho Conservation Data Center
IDFG	Idaho Department of Fish and Game
IDL	Idaho Department of Lands
IDPR	Idaho Department of Parks and Recreation
IMBA	International Mountain Biking Association
IMP	Interim Management Policy
IMPROVE	Interagency Monitoring of Protected Environments Program
INEEL	Idaho National Environmental and Engineering Laboratory
INPS	Idaho Native Plant Society
ITD	Idaho Transportation Department
LAC	Limits of Acceptable Change
lbs/acre	pounds per acre
MBTA	Migratory Bird Treaty Act
MFP	Management Framework Plan
mg/L	milligrams per liter
MGM2	Money Generation Model (NPS cost estimating software)
Monument	Craters of the Moon National Monument and Preserve
MOU	Memorandum of Understanding

NAAQS	National Ambient Air Quality Standards
NADP	National Atmospheric Deposition Program
NAGPRA	National American Graves Protection and Repatriation Act
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NNL	National Natural Landmark
NOI	Notice of Intent
NPS	National Park Service
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
NRV	natural range of variability
NTN	National Trends Network
NWI	National Wetlands Inventory
OHV	off-highway vehicle
PL	Public Law
Plan/EIS	Craters of the Moon National Monument and Preserve Management Plan/ Environmental Impact Statement
PM	particulate matter (PM10 = PM less than 10 microns in diameter; PM2.5 = PM less than 2.5 microns in diameter)
ppb	parts per billion
ppm	parts per million
ppm/hr	parts per million per hour
PSD	Prevention of Significant Deterioration
R&PP	Recreation and Public Purposes Act
RAC	Resource Advisory Committee
RMIS	Recreation Management Information System
RMP	Resource Management Plan
RNA	Reserved Natural Area

ROW	right-of-way
RV	recreational vehicle
SCORTP	State Comprehensive Outdoor Recreation and Tourism Plan
SH	State Highway
SHPO	State Historic Preservation Officer
Stat.	Statute
Strategy	Interior Columbia Basin Strategy
SUM06	the sum of hourly average ozone concentrations greater than 0.06 parts per million
U.S.	United States
US	United States Highway ##
USC	United States Code
USDA	United States Department of Agriculture
USDI	United States Department of the Interior
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
USRD	Upper Snake River District
VRM	Visual Resource Management
WS	Wildlife Services of the United States Department of Agriculture, Animal and Plant Health Inspection Service
WSA	Wilderness Study Area

BIBLIOGRAPHY

Alexander, J.A. 2001. Genetic diversity of populations of *Astragalus oniciformis* using inter-simple sequence repeat (ISSR) markers. Unpublished M.S. thesis, Oregon State University, Corvallis. 90 pp.

Allaback, Sarah. 2000. Mission 66 Visitor Centers: The History of a Building Type. United States Department of the Interior, National Park Service.

Anderson, J.E., K.T. Ruppel, J.M. Glennon, K.E. Holte, and R.C. Rope. 1996. *Plant Communities, Ethnoecology, and Flora of the Idaho National Engineering Laboratory.* Environmental Science and Research Foundation, Idaho Falls, Idaho.

Animal and Plant Health Inspection Service. Idaho Wildlife Services Program Annual Summary Report of Management Activities Conducted During FY 2001 on the Upper Snake River District Bureau of Land Management. Unpublished report on file at the BLM Shoshone Field Office.

Association of Idaho Cities. 2003. Incorporated Cities of Idaho Data – 2003. <http://www.idahocities.org>.

Bart, John. 2001. Personal communication. USGS Wildlife Section.

Belnap, J., J.H. Kaltenecker, R. Rosentreter, J. Williams, S. Leonard, and D. Eldridge. 2001. Biological Soil Crusts: Ecology and Management. Technical Reference TR-1730-2. U.S. Department of the Interior, Bureau of Land Management, Denver, Colorado. 110 pp.

Berger, A. and W. Iams. 1996. *Geoindicators, Assessing Rapid Environmental Changes in Earth Systems.* A.A. Balkema, Rotterdam.

Bever, E.A. 2002. Persistence of pikas in two low-elevation national monuments in the western United States. Park Science 21(2):23-29.

Blaisdell, J.P., R.B. Murray, and E.D. McArthur. 1982. *Managing Intermountain Rangelands – Sagebrush-Grass Ranges*. USDA Intermountain Forest and Range Experiment Station General Technical Report INT-134. 41pp.

Blakesley, J.A. and R.G. Wright. 1988. *A Review of Scientific Research at Craters of the Moon National Monument*. Forest, Wildlife, and Range Experiment Station, University of Idaho, Moscow, Idaho. Station Bulletin 50.

Boggs, Bill. 2002. Telephone conversation with Boggs, Outdoor Recreation Planner, BLM Idaho Falls Field Office, on May 21, 2002, and reference to *Desert Area Fact Sheet (Crystal Ice Caves/Kings Bowl Area Development History).*

Bratton, J.H. 1990. British Wildlife. Seasonal Pools – An overlooked invertebrate habitat. pp 22-29.

Braun, C.E., M.F. Baker, R.L. Eng, J.S. Gashwiler, and M.H. Schroeder. 1976. Conservation Committee Report on effects of alteration of sagebrush communities on the associated avifauna. Wilson Bulletin 88:165-171.

Bunting, S.C., J.L. Kingery, M.A. Hemstrom, M.A. Schroeder, R.A. Gravenmier, and W.J. Hann. 2002. *Altered Rangeland Ecosystems in the Interior Columbia Basin*. USDA, Forest Service Pacific Research Station General Technical Report. PNW-GTR-553. 20pp.

Butler, B.R. 1963. *An Early Man Site at Big Camas Prairie, South-central Idaho*. Tebiwa: Journal of the Idaho State University Museum 6(1):22-33.

Caicco, S.L. 1987. National Natural Landmark Evaluation, Great Rift System (Idaho), Columbia Plateau Province, *Artemisia tridentata* (big sagebrush) Steppe Theme. Unpublished report prepared for U.S. Department of the Interior, National Park Service. Idaho Natural Heritage Program, Idaho Department of Fish and Game. 39 pp. plus appendices.

Caicco, S.L. and C.A. Wellner. 1983a. *Research Natural Area Recommendation for Big Juniper Kipuka*. Unpublished report on file at U.S. Department of the Interior, Bureau of Land Management, Shoshone Field Office, Shoshone, Idaho. 15 pp.

Caicco, S.L. and C.A. Wellner. 1983b. *Research Natural Area Recommendation for Brass Cap Kipuka*. Unpublished report on file at U.S. Department of the Interior, Bureau of Land Management, Shoshone Field Office, Shoshone, Idaho. 15 pp.

Caicco, S.L. and C.A. Wellner. 1983c. *Research Natural Area Recommendation for Sand Kipuka*. Unpublished report on file at U.S. Department of the Interior, Bureau of Land Management, Shoshone Field Office, Shoshone, Idaho. 14 pp.

Clark, David. 2003. Personal communication with David Clark, Chief of Interpretation, Craters of the Moon National Monument, and Scott Earl, Idaho Cave Survey Director.

Connelly, J.W., M.A. Schroeder, A.R. Sands, and C.E. Braun. 2000. Guidelines to manage sage grouse populations and their habitats. Wildlife Society Bulletin. 28(4):967-985.

Cooke, Stephen. 2000. "Twelve Indicators of the Financial Health of Local Governments." Idaho Economics Newsletter. May.

Day, T.A. and R.G. Wright. 1985. The vegetation types of Craters of the Moon National Monument. Bulletin Number 38, Forest, Wildlife and Range Experiment Station, University of Idaho, Moscow. 6 pp. plus map.

Dealy, J.E., D.A. Leckenby, and D.M. Concannon. 1981. Wildlife habitats in managed rangelands—the Great Basin of southeastern Oregon: plant communities and their importance to wildlife. USDA Forest Service General Technical Report PNW-120.

Dockery, D.W., C.A. Pope III, X. Xu, J.D. Spengler, J.H. Ware, M.E. Fay, B.G. Ferris Jr., F.E. Speizer. 1993. An association between air pollution and mortality in six U.S. cities. New England Journal of Medicine. 329:1753-1759.

Drut, M.S., W.H. Pyle, and J.A. Crawford. 1994. Technical note: diets and food selection of sage grouse chicks in Oregon. J. of Range Management 47(1):90-93.

Earl, Scott. 2001. Written communication, Idaho Cave Survey. 1965 Van Circle, Idaho Falls, ID 83404.

Falter, M.C. and R.J. Freitag. 1996. Baseline Study of Water Resources on Craters of the Moon National Monument, Idaho. Technical Report NPS/CCSOUI/NRTR-96/06.

Gabler. K.L., L.T. Heady, and J.W. Laundre. 2001. A habitat suitability model for pygmy rabbits (*Brachylagus idahoensis*) in southeastern Idaho. Western North American Naturalist 61(4):480-489.

Gelbard, J.L. and J. Belnap. 2003. Roads as conduits for exotic plant invasions in a semiarid landscape. Conservation Biology 17: 420-432.

Greater Yellowstone Bald Eagle Working Group. 1996. Greater Yellowstone bald eagle management plan: 1995 update. Greater Yellowstone Bald Eagle Working Group, Wyoming Game & Fish Dept., Lander, WY 82520. 47 pp.

Greeley, R. 1971. Note on the Occurrence of Dribblet Spires in the Snake River Plain, Idaho: Northwest Science, 45(3):145-148.

Greeley, R. and J.S. King, eds. 1977. Volcanism of the Eastern Snake River Plain, Idaho: A Comparative Planetary Geology Guidebook: National Aeronautics and Space Administration CR-154621, 308 p.

Griffith, B. 1983. Ecological Characteristics of Mule Deer: Craters of the Moon N.M., ID. Thesis. University of Idaho College of Forestry, Moscow, ID.

Gruhn, R. 1961 The Archaeology of Wilson Butte Cave, South-central Idaho. Occasional Papers of the Idaho State University Museum 6, Pocatello.

Guffanti, M., S.R. Brantley, and L. McClelland, eds. 2001. Volcanism in National Parks: Summary of the Workshop Convened by the U.S. Geological Survey and National Park Service, 26-29 September 2000, Redding California: U.S. Geological Survey Open-File Report 01-435, 43 p.

Hendee, J.C. and C.P. Dawson. 2002. Wilderness Management Stewardship and Protection of Resources and Values, 3rd edition. International Wilderness Leadership (WILD) Foundation.

Henderson, F.A. and A. Murie. 1958. Proposed addition to Craters of the Moon National Monument. Unpublished report, Craters of the Moon National Monument Library. 9pp.

Hilty, J. and B. Moseley. 1991. Idaho Natural Areas Directory. Conservation Data Center, Idaho Department of Fish and Game, Boise, Idaho.

Hironaka, M., M.A. Fosberg, A.H. Winward. 1983. Sagebrush-grass Habitat Types of Southern Idaho. Forest, Wildlife, and Range Experiment Station. University of Idaho, Moscow, Idaho. Bulletin No. 35.

Hoffman, Roger A. 1988. Craters of the Moon National Monument Base-line Inventory and Monitoring (Wildlife) Final Report, Report B-88. University of Idaho, Cooperative Park Studies Unit. Moscow, Idaho.

Horning, D.S., Jr., and W.F. Barr. 1970. Insects of Craters of the Moon National Monument, Idaho. University of Idaho College of Agriculture, Miscellaneous Series No. 8. 118 pp.

Hughes, S.S., R.P. Smith, W.R. Hackett, and S.R. Anderson. 1999. Mafic Volcanism and Environmental Geology of the Eastern Snake River Plain, Idaho, *in* Hughes, S.S. and G.D. Thackray, eds., Guidebook to the Geology of Eastern Idaho: Idaho Museum of Natural History, p. 143-168.

Humphreys, E.D. et al. 2000. Beneath Yellowstone: Evaluating Plume and Nonplume Models Using Teleseismic Images of the Upper Mantle, in GSA Today, 10(12).

Hurlbutt, D.C. 1998. Order of Partial Decree, Water Right Nos. 34-13586, 34-13587, 34-12383/36-15342, 34-12384/36-15343. 34-12385/36-15344, 34-12386, 34-12387, 34-12388, 34-12389, 36-15345, and 36-15346, Presiding Judge, Snake River Basin Adjudication, Fifth Judicial District for the State of Idaho.

Idaho Conservation Data Center. 2002a. *Glacicvicola bathysciodes* species account. <http://fishandgame.idaho.gov/tech/CDC/spp_accounts_invertebrates/glabat.cfm>.

Idaho Conservation Data Center. 2002b. *Acrolophitus pulchellus* species account. <http://fishandgame.idaho.gov/tech/CDC/spp_accounts_invertebrates/acrpul.cfm>.

Idaho Conservation Data Center. 2002c. National Natural Landmark Evaluation, Craters of the Moon National Monument, Idaho, Columbia Plateau Natural Region Low Sagebrush Theme, Low sagebrush/Idaho Fescue Subtheme. Unpublished Report. Idaho Department of Fish and Game. Boise, Idaho. pp. 24.

Idaho Department of Commerce. 2003. County profiles of Idaho. <http://www.idoc.state.id.us/idcomm/profiles/index.html>.

Idaho Department of Fish and Game. 1997. Idaho Grouse Management Plan. Idaho Dept. of Fish and Game, Boise, ID. 33pp.

Idaho Department of Fish and Game. 2002a. Sage grouse statewide habitat maps. Unpublished data. Idaho Dept. of Fish and Game, Boise, ID.

Idaho Department of Fish and Game. 2002b. Sage grouse statewide survey data. Unpublished data. Idaho Dept. of Fish and Game, Boise, ID.

Idaho Department of Fish and Game. 2003. Unpublished survey or observation data from Idaho Department of Fish and Game.

Idaho Department of Lands. 2002. Idaho Statewide Implementation Strategy for the National Fire Plan. Idaho Department of Lands. Boise, Idaho.

Idaho State Conservation Effort. 1996. Habitat conservation assessment and conservation strategy for the Idaho Dunes Tiger Beetle. Report No. 7 Boise, Idaho.

Interagency Burned Area Emergency Stabilization and Rehabilitation Handbook 2001. <http://fire.r9.fws.gov/ifcc/Esr/Handbook/Default.htm>.

Jurs, L.P. and A.R. Sands. 2004. An inventory, assessment, and recommended management of shrub steppe vegetation in Laidlaw Park, Little Park, and Paddelford Flat, Craters of the Moon National Monument and Preserve. Unpublished report on file, BLM Shoshone Field Office, Shoshone, Idaho. 45 pp. plus appendices.

Keller, B. 1996. A netting survey of water and cave areas used by bats at Craters of the Moon National Monument, Butte County, Idaho. Unpublished report from Idaho Museum of Natural History.

Kerlinger, P. 1995. How birds migrate. Stackpole Books, Mechanicsburg, Pennsylvania.

Kuntz M.A., D.E. Champion, R.H. Lefebvre, et al. 1979. Geological and Geophysical Investigations and Evaluation of Potential Resources of the Proposed Great Rift Wilderness Area, Idaho. U.S. Geological Survey and Bureau of Mines.

Kuntz, M.A., D.E. Champion, E.C. Spiker, and R.H. Lefebvre. 1986. Contrasting magma types and steady-state, volume predictable, basaltic volcanism along the Great Rift, Idaho: Geological Society of America Bulletin, 97:579-594.

Kuntz, M.A., D.E. Champion, E.C. Spiker, R.H. Lefebvre, and L.A. McBroome. 1982. The Great Rift and the evolution of the Craters of the Moon lava field, Idaho, *in* Bonnichsen, B. and Breckenridge, eds., Ceonozoic Geology of Idaho: Idaho Bureau of Mines and Geology Bulletin 26, p. 423-437.

Kuntz, M.A., D.E. Champion, R.H. Lefebvre, and H.R. Covington. 1988. Geologic Map of the Craters of the Moon, Kings Bowl, and Wapi lava fields, and the Great Rift volcanic rift zone, south-central Idaho: United States Geological Survey Miscellaneous Investigations Series Map I-1632.

Kuntz, M.A., H.R. Covington, and L.J. Schorr. 1992. An overview of basaltic volcanism of the eastern Snake River Plain, Idaho, *in* Link, P.K., M.A. Kuntz, and L.B. Platt, eds., Regional Geology of Eastern Idaho and Western Wyoming: Geological Society of America Memoir 179.

Landscape Dynamics Lab. 1999. Idaho Land Cover. Spatial data in ArcInfo grid format. Version 2.1. Idaho Cooperative Fish and Wildlife Research Unit, University of Idaho, Moscow, ID. <http://www.wildlife.uidaho.edu/idgap/idgap_data.asp>.

Laverty, L. and J. Williams. 2000. Protecting People and Sustaining Resources in Fire-Adapted Ecosystems: A Cohesive Strategy. The Forest Service Management Response to the General Accounting Office Report GAO/RCED-99-65. October 13.

Lee, John. 2002. Personal communication.

Liljeblad, Sven. 1957. *Indian Peoples in Idaho.* Idaho State College, Pocatello, Idaho.

Liljeblad, Sven. 1960. Indians of Idaho: A Condensed History of Peoples who lived here for more than a Hundred Centuries, *Idaho Historical Series 3,* Idaho Historical Society, Boise, Idaho.

Louter, D. 1992. Craters of the Moon National Monument: An Administrative History. National Park Service, Pacific Northwest Region. Seattle, Washington.

Machlis, G.E., D.E. Dolsen, and D.L. Madison. 1989. Visitor Services Project Report 20, Craters of the Moon National Monument. University of Idaho, Cooperative Studies Unit, 1(42). February.

Miller, S.J. 1989. Paleontology of the Eastern Snake River Plain: Unpublished manuscript.

Moates, Dwayne. 2002. Personnel communication. NPS Facility Manager.

Montgomery, Judith H. 1984. "Interim Corridor Evaluation Report." Prepared for the Corridor Evaluation Wide Group and the Interregional Marketing Transmission Subcommittee.

Morse, L.E. 1996. Plant rarity and endangerment in North America. Pages 7-22 *in* Falk, D.A., C.I. Millar, and M. Olwell (eds.). Restoring Diversity - Strategies for Reintroduction of Endangered Plants. Island Press, Washington, D.C. 505 pp.

Moseley, R.K. 1989. National Natural Landmark Evaluation, Craters of the Moon National Monument, Idaho, Columbia Plateau Natural Region Low Sagebrush Theme, Low sagebrush/Idaho Fescue Subtheme. Unpublished Report provided by Idaho Natural Heritage Program, Idaho Department of Fish and Game. Boise, ID. pp. 34.

Moseley, R.K. and S.J. Popovich. 1995. The conservation status of Picabo milkvetch (*Astragalus oniciformis* Barneby). Idaho Bureau of Land Management Technical Bulletin No. 95-9. Unpublished report on file at USDI Bureau of Land Management, Shoshone Field Office. 21 pp. plus appendices.

Murphy, Chris. 2002a. Personal communication. Botanist, Idaho Conservation Center.

Murphy, Chris. 2002b. The conservation status of *Phacelia inconspicua* (obscure scorpion plant) in Idaho—an update. Challenge Cost-Share Project, Upper Snake River District, Bureau of Land Management, and Idaho Department of Fish and Game. Unpublished report on file at USDI Bureau of Land Management, Shoshone Field Office. 20 pp. plus appendices.

Murphy, Robert F. and Yolanda Murphy. 1960. Shoshone-Bannock Subsistence and Society, *University of California Anthropological Records* 16(7): 293-338. Berkeley, California.

Nace, R L., P.T. Voegeli, J.R. Jones, and M. Deutsch. 1975. Generalized Geologic Framework of the National Reactor Testing Station, Idaho. U.S. Geological Survey Professional Paper 725-B.

National Atmospheric Deposition Program (NRSP-3)/National Trends Network. 2002. NADP Program Office, Illinois State Water Survey, 2204 Griffith Drive, Champaign, IL 61820.

National Research Council. 1994. Rangeland Health: New Methods to Classify, Inventory, and Monitor Rangelands.

Omernik, J.M. 1986. Map-Ecoregions of the United States, Corvallis Environmental Research Laboratory, U.S. Environmental Protection Agency.

Paige, C. and S.A. Ritter. 1999. Birds in a sagebrush sea. Partners in Flight, Western Working Group. p 5.

Peterson, Charles. 2003. Personal communication.

Peterson, J.G. 1995. Sagebrush: ecological implications of sagebrush manipulation. Montana Department of Fish, wildlife and Parks, Helena.

Pierson, E.D., M.C. Wackenhut, J.S. Altenbach, P. Bradley, P. Call, et al. 1999. Species conservation assessment strategy for Townsend's big-eared bat (*Corynorhinus townsendii).* Idaho Conservation Effort, Idaho Dept. of Fish and Game, Boise, Idaho.

Popovich, S. 2003. Personal communication. Former Shoshone Field Office, BLM, Botanist.

Reagan, R. 1985. Message to the Congress Proposing Additions to the National Wild and Scenic Rivers and National Wilderness Preservation Systems. April 26.

Rich, Terrell. 1984. Mountain Bluebird Use of Treeless Lava Flows for Nest Sites. Western Birds 15: 39-40.

Ridenour. 1979. Mineral Resources of the Wapi Lava Flow, Addition to the Grassland Kipuka Instant Wilderness Study Area, Blaine and Power Counties, Idaho. Bureau of Mines.

Rogers, J. and J. Sovick. 2001. *Let There Be Dark: The National Park Service and the New Mexico Night Sky Protection Act.* The George Wright Forum, V 18, 2001, Number 4, Protecting Dark Skies, Guest Editor: Joe Sovick

Rust, Steve. 2002. National Natural Landmark Evaluation, Columbia Plateau Natural Region, Low Sagebrush Theme, Low Sagebrush/Idaho Fescue Subtheme. Unpublished report prepared for U.S. Department of the Interior, National Park Service Idaho Conservation Data Center, Idaho Department of Fish and Game, Boise Idaho, 27 pp.

Sandberg, D.V. and F.N. Dost. 1990. Effects of prescribed fire on air quality and human health. In: Wasltad, J.W., S.R. Radosevich, and D.V. Sandberg, eds. Natural and prescribed fire in Pacific Northwest forests. Corvallis: Oregon State University Press: 191-218.

Saras, M. 1982. Laidlaw Park Allotment Controlled Burn Environmental Assessment. EA# ID-050-2-041 on file at Bureau of Land Management, Shoshone Field Office, Shoshone, Idaho. 12 pp.

Schroeder, M.A., J.R. Young, and C.E. Braun. 1999. Sage grouse (*Centrocercus urophasianus). In* The Birds of North America, No.425 (A. Poole and F. Gill, eds.). The Birds of North America, Inc., Philadelphia, Pennsylvania.

Shallat, T. and L. Burke. 1994. Snake, The Plain and its People. Boise State University, Boise, Idaho.

Smith, R.B., and L.J. Siegel. 2000. Windows into the Earth, The Geologic Story of Yellowstone and Grand Teton National Parks, Oxford University Press, 242 p.

Smithsonian Institute. 2003. Museum Records of the National Museum of Natural History at the Smithsonian Institute, Washington D.C.

State of Idaho, Department of Agriculture. 2001. Noxious Weed Rules. Section 22-2403, Idaho Code. IDAPA, Title 06, Chapter 22.

State of Idaho, INEEL Oversight Program. 2003. 2002 Environmental Surveillance Report – A compilation and explanation of data collected by the INEEL Oversight Program during 2002. INEEL Oversight Program, Idaho Falls, Idaho.

Steward, J.H. 1938. Basin-Plateau Aborigial Sociopolitical Groups. Bureau of American Ethnology Bulletin 120. Washington. Reprinted: 1970, University of Utah Press, Salt Lake City.

Stoller, S.M. 2003. INEEL Annual Site Environmental Report – 2002. Report prepared under contract for the U.S. Department of Energy, Idaho Operations Office, DOE/ID-12082(02).

Tisdale, E.W., M. Hironka, and M.A. Fosberg. 1965. An area of pristine vegetation in Craters of the Moon National Monument, Idaho. Ecology, 46(3):349-352.

Treaty with the Eastern Band Shoshoni and Bannock 1868, commonly referred to as the Fort Bridger Treaty (15 Statute 673).

Trijonis, J., R. Charlson, R. Husar, W.C. Malm, M. Pitchford, and W. White. 1991. Visibility: existing and historical conditions— causes and effects. In: Acid deposition: state of science and technology: Report 24. National Acid Precipitation Assessment Program. Washington, DC: Government Printing Office.

Trimbel, S. 1989. The Sagebrush Ocean. University of Nevada Press, Reno.

U.S. Bureau of the Census. 2003. Projections of the total population of states: 1995-2005 <http://www.census.gov/population/projections/state/stpjpop.txt>.

U.S. Department of Agriculture. 2002. Environmental Assessment. Predator Damage Management in Southern Idaho. February.

U.S. Department of Agriculture, Animal and Plant Health Inspection Service. 2004. Site-specific environmental assessment rangeland Mormon cricket suppression program. ID-PPQ-MC-2004-001. UDDA-APHIS, Boise, Idaho. 83 pp. March.

U.S. Department of Agriculture, Animal and Plant Health Inspection Service. 2004. Site-specific environmental assessment rangeland grasshopper suppression program. ID-PPQ-GH-2004-003. UDDA-APHIS, Boise, Idaho. 73 pp. March.

U.S. Department of Energy. 1996. Comprehensive Facility and Land Use Plan, Idaho National Engineering Laboratory, DOE/ID-10514.

U.S. Department of the Interior and U.S. Department of Agriculture. 1995. Federal Wildland Fire Management Policy & Program Review. 1995. Final Report. December 18. 45p.

U.S. Department of the Interior, Bureau of Land Management. Technical Reference TR 1737-9 and 11.

U.S. Department of the Interior, Bureau of Land Management. 1980a. Great Rift Proposed Wilderness, Draft Environmental Impact Statement.

U.S. Department of the Interior, Bureau of Land Management. 1980b. Final Environmental Impact Statement: Great Rift Wilderness. Bureau of Land Management, Idaho Falls District, Idaho Falls, Idaho. pp. 83.

U.S. Department of the Interior. Bureau of Land Management. 1981a. Big desert management framework plan. Shoshone, Idaho.

U.S. Department of the Interior. Bureau of Land Management. 1981b. Malad management framework plan. Idaho Falls, Idaho.

U.S. Department of the Interior. Bureau of Land Management. 1981c. Sun Valley management framework plan. Idaho Falls, Idaho.

U.S. Department of the Interior. Bureau of Land Management. 1983. Big Lost management framework plan. Idaho Falls, Idaho.

U.S. Department of the Interior. Bureau of Land Management. 1985. Monument resource management plan. Shoshone, Idaho.

U.S. Department of the Interior, Bureau of Land Management. 1987. Final Environmental Impact Statement, Monument Wilderness Study, Shoshone District Office, Shoshone Idaho.

U.S. Department of the Interior. Bureau of Land Management. 1988. Pocatello proposed (final) resource management plan and final environmental impact statement. Idaho Falls, Idaho.

U.S. Department of the Interior, Bureau of Land Management. 1993; Revised 1995. Riparian Area Management, Process for Assessing Proper Functioning Condition, Technical Report 1737-9, p. 4. BLM/SC/ST-93/ 003+1737+REV95, Service Center, Colorado. 51 pp.

U.S. Department of the Interior, Bureau of Land Management. 1994. Riparian Area Management, Process for Assessing Proper Functioning Condition for Lentic Riparian-Wetland Areas. Technical report 1737-11. BLM/SC/ST-94/008+1737, Service Center, Colorado. 37 pp.

U.S. Department of the Interior, Bureau of Land Management. 1995. H-8550-1-Interim Management Policy for Lands under Wilderness Review. BLM Manual.

U.S. Department of the Interior. Bureau of Land Management. 1999. Cave resources management plan. Upper Snake River District, Idaho. 42 pp.

U.S. Department of the Interior, Bureau of Land Management. 2000a. BLM Facts: payment in lieu of taxes (PILT) to Idaho counties. <http://www.id.blm.gov/blmfacts/data/pilt_2000.htm>.

U.S. Department of the Interior. Bureau of Land Management. 2000b. BLM Land Use Planning Handbook H-1601-1.

U.S. Department of the Interior, Bureau of Land Management. 2001a. BLM Facts: grazing fee receipts distributed to Idaho counties. <http://www.id.blm.gov/blmfacts/data/grazing_receipts.htm>.

U.S. Department of the Interior, Bureau of Land Management. 2001b. H-6310-1-Wilderness Inventory and Study Procedures. BLM Manual.

U.S. Department of the Interior, Bureau of Land Management. 2001c. Surface Management Status 1:100,000-scale topographic maps, Craters of the Moon (2001) and Lake Walcott (2000) quads.

U.S. Department of the Interior, Bureau of Land Management. 2002a. Craters of the Moon Nation Monument Interim Management Plan. Instruction Memorandum #ID 070-2002-001.

U.S. Department of the Interior, Bureau of Land Management. 2002b. Idaho Bureau of Land Management: Road Management and Maintenance Guidelines for Public Lands in Idaho. Idaho State Office, Boise, Idaho. November.

U.S. Department of the Interior, Bureau of Land Management. 2003. Instruction Memorandum No. 2003 regarding Land Use Plan and Implementation Plan Interim Guidance for Wildland Fire Management. Washington D.C. 6 pp.

U.S. Department of the Interior, Bureau of Land Management. 2004. Fire Management Plan for the Upper Snake River District, South Central Idaho Area. 190 pp.

U.S. Department of the Interior, Bureau of Land Management. 2005. Normal fire rehabilitation plan and environmental assessment ID-077-2004-008. Burley and Shoshone Field Offices, Idaho. 190 pp.

U.S. Department of the Interior, Bureau of Land Management/National Park Service. 2001. Memorandum of Agreement. Craters of the Moon National Monument, Addendum #1 Interim Management Guidelines.

U.S. Department of the Interior, Department of Agriculture, Department of Energy, Department of Commerce, Environmental Protection Agency, Department of Defense, Federal Emergency Management Agency, and National Association of State Foresters. 2001. Review and Update of the 1995 Federal Wildland Fire Management Policy. January. 45p.

U.S. Department of the Interior, National Park Service. 1989. Reconnaissance Survey/Expansion of Craters of the Moon National Monument, Idaho. NPS Study Team, Denver Service Center (DSC), p. 31.

U.S. Department of the Interior, National Park Service. 1990. Management Alternatives and Reconnaissance Survey/Expansion of Craters of the Moon National Monument, Idaho. NPS Study Team, Denver Service Center (DSC), 49 pp.

U.S. Department of the Interior, National Park Service. 1991. Resource Management Plan. CRMO-N-210.00. December.

U.S. Department of the Interior, National Park Service. 1992. General Management Plan (GMP), Craters of the Moon National Monument, Idaho. NPS Study Team, Denver Service Center (DSC), 87pp. June.

U.S. Department of the Interior, National Park Service. 1994-2000. Annual Data Summary, Craters of the Moon National Monument, 1994-2000. National Park Service Gaseous Air Pollutant Monitoring Network, Air Resources Division, Denver, Colorado.

U.S. Department of the Interior, National Park Service. 1996. Craters of the Moon National Monument Wilderness Management Plan.

U.S. Department of the Interior, National Park Service. 1998. Baseline Water Quality Data Inventory and Analysis, Craters of the Moon National Monument. Technical Report NPS/NRWRD/NRTR-98/178, Water Resources Division, Fort Collins, Colorado.

U.S. Department of the Interior, National Park Service. 2000a. Craters of the Moon National Monument Wildland Fire Management Plan and Environmental Assessment. 86 pp.

U.S. Department of the Interior, National Park Service. 2000b. National Register of Historic Places Registration Form – Headquarters Area Craters of the Moon National Monument. Columbia Cascades Support Office, Seattle Washington.

U.S. Department of the Interior, National Park Service. 2001a. *Geologic Processes Scoping Meeting Report for Craters of the Moon*. October 24. <http://www2.nature.nps.gov/grd/geology/monitoring/ib4/crmo_ib4_report.pdf>.

U.S. Department of the Interior, National Park Service. 2001b. Management Policies. Washington, D.C. Available on the Internet at <http://www.nps.gov/refdesk/mp>.

U.S. Department of the Interior, National Park Service. 2002a. Air Quality in the National Parks, Second Edition. Air Resources Division, Denver, Colorado.

U.S. Department of the Interior, National Park Service. 2002b. Superintendent's Compendium, Craters of the Moon National Monument and Preserve. 14 pp.

U.S. Department of the Interior, National Park Service. 2003. Interim Final Guidance on Assessing Impacts and Impairment to Natural Resources. Natural Resource Program. April.

U.S. Department of the Interior. 2000. News Release: "Babbitt Releases Craters of the Moon Expansion Map," including Consensus Management Points for Craters of the Moon National Monument Proposed Expansion. May 23.

U.S. Government Printing Office. 2001. Code of Federal Regulations, Title 36 – Parks, Forests, and Public Property, Chapter I – National Park Service, Department of the Interior, Park 62 – National Natural Landmarks Program.

U.S. House of Representatives. 1970. Hearings before the Subcommittees on Public Lands and National Parks and Recreation of the Committee on Interior and Insular Affairs, House of Representatives, Ninety-first Congress, HR 16821, HR 16822, and SB 1732, Bills to Designate Certain Lands in Craters of the Moon National Monument in Idaho as Wilderness. pp 508-509. June 26.

Ward, D.E., C.C. Hardy, D.V. Sandberg, and T.E. Reinhardt. 1989. Part III-emissions characterization. *In* Sandberg, D.V., D.E. Ward, R.D. Ottmar, comp. eds. Mitigation of prescribed fire atmospheric pollution through increased utilization of hardwoods, piled residues, and long-needled conifers. Final report. U.S. DOE, EPA. Seattle, WA: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station.

Welch, B. 2002. Bird counts of burned versus unburned big sagebrush sites. USDA Forest Service Research Note, RMRS-RN-16.

Wellner, C.A. and R.K. Moseley. 1983. Research Natural Area Recommendation for Sand Kipuka, Bureau of Land Management, Shoshone District, Idaho. 14 pp.

Western Utility Group. 1992. Western regional corridor study. Sierra Pacific Power Company.

Whipple, J. 1992. Review of Herbarium/plant list. Unpublished memo/report.

Whisenant, S.G. 1990. Changing fire frequencies on Idaho's Snake River Plains: ecological and management implications. Pages 4-10 *in* McArthur, E.D., E.M. Romney, S.D. Smith, and P.T. Tueller, Comps. Proceedings – Symposium on cheatgrass invasion, Shrub die-off, and other aspects of shrub biology and management. General Technical Report INT-276. U.S. Department of Agriculture, Forest Service, Ogden, Utah.

Williams, G.W. 2001. References on American Indian use of fire in ecosystems. USDA Forest Service, Washington, D.C. 34 pp.

Williams, R. 2002. USDA Wildlife Services, Arco, ID. Personal communication.

Wisdom, M.J., R.S. Holthausen, B.C. Wales, C.D. Hargis, V.A. Saab, et al. 2000. Source habitats for terrestrial vertebrates of focus in the Interior Columbia Basin: Broad-scale trends and management implications. USDA Forest Service, General Technical Report GTR-PNW-485, 529 pp.

Yingst, D., and H.M. Handy. 1961. Our Public Lands 11:8-9, 14pp.

LIST OF PREPARERS

The Craters of the Moon National Monument Planning Team

Jim Morris, NPS, Monument Superintendent
Rick VanderVoet, BLM, Monument Manager, Shoshone Field Office
Adrienne A. Anderson, NPS, Planning Team Captain
Barbara Bassler, BLM, Planner
John Apel, NPS, Resources Program Manager
Marny Apel, NPS, Planner
David Clark, NPS, Chief of Interpretation
Lisa Cresswell, BLM, Archaeologist
Jesse German, BLM, GIS Specialist
Dave Freiberg, BLM, Outdoor Recreation Planner
Julie Hilty, BLM, Botanist/Fire Ecologist
Paul McClain, BLM, Wildlife Biologist
Codie Martin, BLM, Rangeland Management Specialist
Mike Munts, NPS, Wildlife Biologist
Doug Owen, NPS, Geologist/Acting Chief of Interpretation
Mike Saras, BLM, GIS Specialist
Mike Wissenbach, NPS, NEPA Coordinator
Paige Wolken, NPS, Vegetation Ecologist

Consultants

Sandi Arena, US Fish & Wildlife Service, Pocatello, Idaho
Terry Gregory, Wildlife Biologist, Idaho Dept. of Fish and Game, Fairfield, Idaho
Terry Heslin, BLM, Idaho State Office, Boise, Outdoor Recreation Planner
Paul Oakes, BLM, Planner, Pocatello Field Office
Mitch Werner, BLM, Writer-Editor, Pocatello Field Office
Mel Kuntz, USGS, Geologist, Denver, CO
Mike McDonald, Wildlife Manager, Idaho Dept. of Fish and Game, Jerome, Idaho
Rebecca Carter, Socioeconomic Consultant, Sonoran Institute, Tuscon, AZ
Nancy Van Dyke, Senior Consultant, URS Corporation, Denver, CO
Lisa Pine, Environmental Planner, URS Corporation , Denver, CO
Brenda Miller, Editor, URS Corporation, Denver, CO
Andy Richardson, Editor, URS Corporation, Denver, CO
Jody Glennon, Staff Assistant, URS Corporation, Denver, CO
Susan Pella, Technical Typist, URS Corporation, Denver, CO
Aileen Torres, Technical Typist, URS Corporation, Denver, CO

INDEX

As the nation's conservation agency, the Department of Interior has the responsibility for most of our nationally owned public lands and natural resources. This includes fostering sound use of our land and water resources; protecting our fish, wildlife, and biological diversity; preserving the environment and cultural values of our national parks and historical places; and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to ensure that their development is in the best interests of all our people by encouraging stewardship and citizen participation in their care. The department also has a major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.

NPS D-75A / PMIS-63374 / July 2005 / Printed on recycled paper

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE AND BUREAU OF LAND MANAGEMENT