

United States Department of the Interior
Bureau of Land Management
Coeur d'Alene District, Idaho
Cottonwood Field Office
1 Butte Drive
Cottonwood, ID 83522

DECISION RECORD

Special Recreation Permit for Commercial Outfitting In Game Management Unit 11
BLM-ID-C020-2012-0018-EA

1. Background

The Bureau of Land Management (BLM) proposed to issue a Special Recreation Permit (SRP) for commercial outfitting in GMU 11. The Cottonwood Field Office (CFO) coordinates SRPs with the Idaho Outfitter & Guides Licensing Board and Idaho Department of Fish and Game.

The BLM previously authorized a temporary SRP for commercial use in GMU 11 which has been in operation since 1991, and allows guided hunting, day hikes, mountain bike tours, photography, and backpacking trips.

2. Decision

It is my decision to issue the attached 2930 Special Recreation Permit for use on BLM lands for commercial use activates within GMU 11 shown on the attached map. The permit is subject to the attached terms and stipulations.

3. Authority

BLM has the authority to grant a permit in accordance with 43 U.S.C. 1201; 43 U.S.C. 1701; 16 U.S.C. 460 L-6(a); and 43 CFR group 2930.

4. Rationale

In addition to the Proposed Action, a no action alternative was analyzed in the environmental analysis (EA). Other alternatives were also considered but eliminated from further analysis. The Proposed Action was selected because it meets the purpose and need to provide a service to the recreating public and follows management direction of the 2009 Cottonwood RMP.

The project is consistent with Federal, State and Local laws and requirements. It conforms to 2009 Cottonwood Resource Management Plan (Revised EA, section 1.3), specifically with direction for the Craig Mountain Special Recreation Management Area, Action RC1.2.5 Recreation Niche: Manage the Craig Mountain SRMA as an undeveloped recreation-tourism market to provide opportunities for local residents and

visitors to pursue land based activities in a natural setting with an emphasis on big game hunting, hiking, horseback riding, and mountain biking. In addition it complies with Recreation Action RC-1.2.5 – Issue commercial recreation permits for the Craig Mountain SRMA only with concurrence of the Idaho Department of Fish and Game. The BLM consulted with the IDFG regarding this permit, as it does whenever considering special recreation permits for new or modified activities related to hunting or fishing, regarding the need, resource capacity and allocation to the industry.

As described in the Revised EA and Finding of No Significant Impacts, this action will not result in significant impacts to the environment. The action does not violate Federal, State, or Local laws or requirements for the protection of the environment. Design measures in the stipulations will help protect the environment and stipulation for the permit can be modified to address any resource or safety concerns that might arise in the future.

5. Public Involvement

Scoping for preparation of the original EA included publishing project information on the internet and sending letters (dated January 23, 2009) requesting comments from various interest groups, the public, 118 owners of private property adjacent to BLM lands located in GMUs 11 and 13, 27 state and federal agencies and professional organizations, and 67 commercial outfitters. During public scoping for this proposed action the BLM received comments which helped to identify the issues analyzed in the original EA.

The completed original EA was made available to the public for comment from June 24, 2013 to July 25, 2013. Substantive comments received during the public review of the original EA are addressed in Appendix B of this decision record. After consulting with the IDFG and considering the comments received on the original EA, the BLM revised the proposed action and analysis, and documented these changes in a Revised EA.

6. Coordination and Consultation

Throughout this planning process, the BLM has worked with the IDFG and IDL to discuss commercial hunting and commercial recreational-related activities. Both the BLM and IDFG continue to work on a consistent co-management approach for commercial hunting in the CMWMA within GMU 11 than meets the need for each agencies goals, mission and management planning.

The BLM also contacted the Nez Perce Tribe through an initial scoping letter, and an additional letter describing this project. They were also sent notification about the comment period for the EA. No response was received.

7. Protest and Appeal

This decision constitutes my final decision. Any party that is adversely affected by it may appeal to the Interior Board of Land Appeals in accordance with the regulations contained in 43 CFR, Part 4. A notice of appeal must be filed in this office (Cottonwood Field Office, 1 Butte Drive Cottonwood, ID 83522) within 30 days from receipt of this

decision. The Notice of appeal must be sent certified mail. The appellant has the burden of showing that the decision is in error in a statement of reasons. If a statement of reasons for the appeal is not included with the notice, it must be filed with the Interior Board of Land Appeals (IBLA), Office of Hearings and Appeals, U.S. Department of the Interior, 801 North Quincy St., Suite 300-QC, Arlington, VA 22203 within 30 days of filing the notice of appeal with the authorized officer. In accordance with 43 CFR 2931.8, this decision will go into effect immediately and will remain in effect while appeals are pending unless a stay is granted. Any request for stay of this decision, in accordance with 43 CFR 4.21, must be filed with your notice of appeal.

/s/ Robbin Boyce for
Will Runnoe
Field Manager
Cottonwood Field Office

7/1/15
Date

Attachments:

- A. Special Use Permit and Map
- B. Response to Comments
- C. Map of the Permit Area

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

Permit No.
ID420-REC5-959

SPECIAL RECREATION PERMIT
(43 U.S.C. 1201; 43 U.S.C. 1701; 16 U.S.C. 460L-6(a); and 43 CFR 2930)

BLM Issuing Office
Cottonwood Field Office
Cottonwood Idaho

Permittee Barker Outfitting, LLC dba Barker Trophy Hunt

Authorized Representative Jon Barker

Address 34808 Hassinger Road
Lenore, Idaho 83541

Phone Number 208-836-5551

Email Address jonbarker7@gmail.com

Web Site barkerhunts.com

Permit is for (check all that apply): Commercial Competitive Organized Group Vending

Date Issued 7/1/2015 Date Expires 7/1/2025 (Terms greater than one year subject to annual authorization.)

Seasonal or other period of use limitations Hunting August 30 thru December 31. Non-hunting activities April thru November.

Permit Fee Formula Commercial: Greater of \$105/year or 3% of gross revenue

Assigned Sites (commercial only): None No. of Assigned Sites subject to fees N/A

Special Area Fees Apply: Yes No Special Area Fee N/A

Minimum insurance coverage requirements Low Risk: \$300,000 per occurrence, \$600,000 annual aggregate

Permit is valid only if a current Certificate of Insurance, listing the United States as additional insured, is on file with the issuing BLM Office.

Post use report due date(s) Dec 31st each year Bond Requirement: None Bond Amount N/A

Purpose and activities authorized

See attached purpose and activities authorized for Barker Outfitting LLC

Approved Area of Operation

See attached map for Barker Outfitting LLC SRP area description on BLM lands.

Certification of Information: I certify use of this permit will be as per the operations plan on file with BLM. I acknowledge I am required to comply with any conditions or stipulations required by the BLM including the General Terms listed on page two of this form and any additional stipulations which may be attached.

Additional Stipulations are attached: Yes No

[Signature]
(Permittee Signature)

6-30-15
(Date)

Approved and issued for the conduct of permitted activities and locations shown on this permit and in conformance with the operating plan. Permit is subject to General Terms and any additional stipulations attached. *see addendum from permittee & 43 C.F.R.*

Robin P. Boyce
(BLM Authorized Officer Printed Name)

[Signature]
(BLM Authorized Officer Signature)
Acting Field Manager

7/1/15
(Date)

GENERAL TERMS

- a. The permittee shall comply with all Federal, State, and local laws; ordinances; regulations; orders; postings; or written requirements applicable to the area or operations covered by the Special Recreation Permit (SRP or permit). The permittee shall ensure that all persons operating under the authorization have obtained all required Federal, State, and local licenses or registrations. The permittee shall make every reasonable effort to ensure compliance with these requirements by all agents of the permittee and by all clients, customers, participants, and spectators.
- b. An SRP authorizes special uses of the public lands and related waters and, should circumstances warrant, the permit may be modified by the BLM at any time, including modification of the amount of use. The authorized officer may suspend or terminate an SRP if necessary to protect public resources, health, safety, the environment, or because of non-compliance with permit stipulations. Actions by the BLM to suspend or terminate an SRP are appealable.
- c. No value shall be assigned to or claimed for the permit, or for the occupancy or use of Federal lands or related waters granted thereupon. The permit privileges are not to be considered property on which the permittee shall be entitled to earn or receive any return, income, price, or compensation. The use of a permit as collateral is not recognized by the BLM.
- d. Unless expressly stated, the permit does not create an exclusive right of use of an area by the permittee. The permittee shall not interfere with other valid uses of the federal land by other users. The United States reserves the right to use any part of the area for any purpose.
- e. The permittee or permittee's representative may not assign, contract, or sublease any portion of the permit authorization or interest therein, directly or indirectly, voluntarily or involuntarily. However, contracting of equipment or services may be approved by the authorized officer in advance, if necessary to supplement a permittee's operations. Such contracting should not constitute more than half the required equipment or services for any one trip or activity and the permittee must retain operational control of the permitted activity. If equipment or services are contracted, the permittee shall continue to be responsible for compliance with all stipulations and conditions of the permit.
- f. All advertising and representations made to the public and the authorized officer must be accurate. Although the addresses and telephone numbers of the BLM may be included in advertising materials, official agency symbols may not be used. The permittee shall not use advertising that attempts to portray or represent the activities as being conducted by the BLM. The permittee may not portray or represent the permit fee as a special federal user's tax. The permittee must furnish the authorized officer with any current brochure and price list if requested by the authorized officer.
- g. The permittee assumes responsibility for inspecting the permitted area for any existing or new hazardous conditions, e.g., trail and route conditions, landslides, avalanches, rocks, changing water or weather conditions, falling limbs or trees, submerged objects, hazardous flora/fauna, abandoned mines, or other hazards that present risks for which the permittee assumes responsibility.
- h. In the event of default on any mortgage or other indebtedness, such as bankruptcy, creditors shall not succeed to the operating rights or privileges of the permittee's SRP.
- i. The permittee cannot, unless specifically authorized, erect, construct, or place any building, structure, or other fixture on public lands. Upon leaving, the lands must be restored as nearly as possible to pre-existing conditions.
- j. The permittee must present or display a copy of the SRP to an authorized officer's representative, or law enforcement personnel upon request. If required, the permittee must display a copy of the permit or other identification tag on equipment used during the period of authorized use.
- k. The authorized officer, or other duly authorized representative of the BLM, may examine any of the records or other documents related to the permit, the permittee or the permittee's operator, employee, or agent for up to three years after expiration of the permit.
- l. The permittee must submit a post-use report to the authorized officer according to the due dates shown on the permit. If the post-use report is not received by the established deadline, the permit will be suspended and/or late fees assessed.
- m. The permittee shall notify the authorized officer of any incident that occurs while involved in activities authorized by these permits, which result in death, personal injury requiring hospitalization or emergency evacuation, or in property damage greater than \$2,500 (lesser amounts if established by State law). Reports should be submitted within 24 hours.

Addendum for signature on permit # ID420-RECS-959

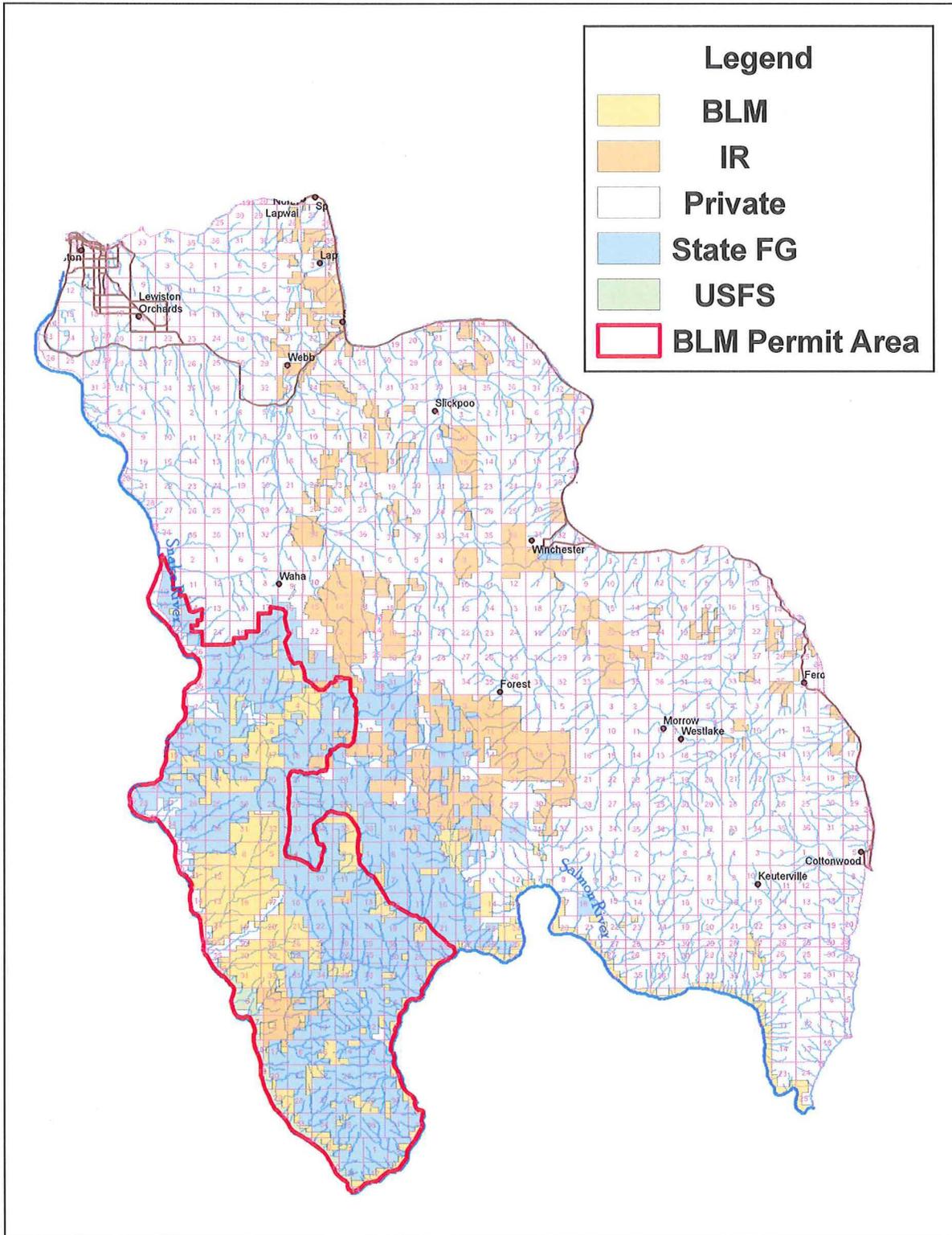
" The special recreation permit is signed and accepted by
The permittee with the understanding that the permit may change
with concurrence from FDFG on hunter numbers and full reservation
of the permittees rights to appeal this SRF decision under
43 C.F.R. 2931.8 or as otherwise provided under applicable Law "


Jon Barker

Purpose and Activities Authorized for Barker Outfitting LLC Attachment

To provide hunts for deer, elk, sheep, forest grouse and chukar for 7 hunters annually, set up and use 2-3 temp spike camps, and conduct scouting. Conduct day hikes, mountain bike tours, and photography & backpacking trips for up to 20 clients annually. As described in IOGLB license #18326-1 and refer to BLM EA #BLM-ID-C020-2012-0016-EA. Additional stipulations are also attached along with a map for Barker Outfitting LLC SRP area description for BLM lands.

BARKER OUTFITTING LLC DBA BARKER TROPHY HUNTS
 SRP #ID420-REC5-959
 AREA DESCRIPTION FOR SRP ACTIVITIES ON BLM LANDS



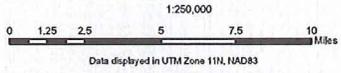
Legend

- BLM
- IR
- Private
- State FG
- USFS
- BLM Permit Area



The surface management status ("land ownership") should be used as a general guide only. Official land records, located at the Bureau of Land Management (BLM) and other offices, should be checked for up-to-date information concerning any specific tract of land.

No warranty is made by the Bureau of Land Management. The accuracy, reliability, or completeness of these data for individual use or aggregate use with other data is not guaranteed. The following cannot be made Section 508 compliant. For help with its data or information, please contact the BLM Idaho State Office Webmaster at 208-373-4000.



Barker Outfitting LLC DBA Baker Trophy Hunts
SRP #ID420-REC5-959 additional stipulations

1. The permittee shall comply with all Federal, State, and local laws; ordinances; regulations; orders; postings; or written requirements applicable to the area or operations covered by the Special Recreation Permit (SRP or permit). The permittee shall ensure that all persons operating under the authorization have obtained all required Federal, State, and local licenses or registrations. The permittee shall make every reasonable effort to ensure compliance with these requirements by all agents of the permittee and by all clients, customers, participants, and spectators.
2. A Special Recreation Permit authorizes special uses of the public lands and related waters, should circumstances warrant, the permit may be modified by the BLM at any time, including modification of the amount of use. The BLM reserves the right to amend, change or add new stipulations to SRP's. The authorized officer may suspend or terminate a SRP if necessary to protect public resources, health, safety, the environment, or because of noncompliance with permit stipulations. Actions by the BLM to suspend or terminate a SRP are appealable.
3. No value shall be assigned to or claimed for the permit, or for the occupancy or use of Federal lands or related waters granted thereupon. The permit privileges are not to be considered property on which the permittee shall be entitled to earn or receive any return, income, price, or compensation. The use of a permit as collateral is not recognized by the BLM.
4. Unless expressly stated, the permit does not create an exclusive right of use of an area by the permittee. The permittee shall not interfere with other valid uses of the federal land by other users. The United States reserves the right to use any part of the area for any purpose.
5. The permittee or permittee's representative may not assign, contract, or sublease any portion of the permit authorization or interest therein, directly or indirectly, voluntarily or involuntarily. However, contracting of equipment or services may be approved by the authorized officer in advance, if necessary to supplement a permittee's operations. Such contracting should not constitute more than half the required equipment or services for any one trip or activity and the permittee must retain operational control of the permitted activity. If equipment or services are contracted, the permittee shall continue to be responsible for compliance with all stipulations and conditions of the permit.
6. All advertising and representations made to the public and the authorized officer must be accurate. Although the addresses and telephone numbers of the BLM may be included in advertising materials, official agency symbols may not be used. The permittee shall not use advertising that attempts to portray or represent the activities as being conducted by the BLM. The permittee may not portray or represent the permit fee as a special federal

user's tax. The permittee is required to notify BLM of scheduled hunts, number of clients, and general area of use prior to the trip. This is to help BLM conduct possible compliance checks of the permit. The permittee must furnish the authorized officer with a current brochure, price list, a copy of your IOGLB outfitter license, copy of insurance and payment of fees for the Special Recreation Permit by April 15th each year.

7. The permittee assumes responsibility for inspecting the permitted area for any existing or new hazardous conditions, e.g., trail and route conditions, landslides, avalanches, rocks, changing water or weather conditions, falling limbs or trees, submerged objects, hazardous flora/fauna, abandoned mines, or other hazards that present risks for which the permittee assumes responsibility. The permittee also assumes responsibility for clients to ensure they are shooting in safe directions to avoid other people out recreating.
8. In the event of default on any mortgage or other indebtedness, such as bankruptcy, creditors shall not succeed to the operating rights or privileges of the permittee's SRP.
9. The permittee cannot, unless specifically authorized, erect, construct, or place any building, structure, or other fixture on public lands. Upon leaving, the lands must be restored as nearly as possible to pre-existing conditions.
10. The permittee must present or display a copy of the SRP to an authorized officer's representative, or law enforcement personnel upon request. If required, the permittee must display a copy of the permit or other identification tag on equipment used during the period of authorized use.
11. The authorized officer, or other duly authorized representative of the BLM, may examine any of the records or other documents related to the permit, the permittee or the permittee's operator, employee, or agent for up to three years after expiration of the permit.
12. The permittee must submit a Post Use Report to the authorized officer for every year the permit is in effect. The report will show the number of hunters, names of clients and guides, days hunted and the area they hunted and all the fees they paid and will be reported to the BLM by December 31 each year. If the Post Use Report is not received by December 31, the permit will be suspended and/or fines assessed.
13. The permittee shall notify the authorized officer of any incident that occurs while involved in activities authorized by these permits, which result in death, personal injury requiring hospitalization or emergency evacuation, or in property damage greater than \$2,500 (lesser amounts if established by State law). Reports should be submitted within 24 hours.
14. The permittee is responsible to know where their guides and clients are at all times to ensure that they are not trespassing on private lands or outside of the operating area on BLM lands.

15. Insurance: At a minimum, the permittee shall have in force public liability insurance covering: (1) damage to property in the amount of thirty thousand dollars (\$30,000); and (2) damage to persons (bodily injury or death) in the amount of three hundred thousand dollars (\$300,000) per occurrence. The policy shall also have a minimum annual aggregate limit of six hundred thousand dollars (\$600,000). The coverage shall extend to property damage, bodily injury, or death arising out of the permittee's operations under the permit, including, but not limited to, the occupancy or use of the lands, structures, facilities, or equipment authorized by the permit. The insurance shall name the United States as additional insured and provide for specific coverage for the permittee's contractually assumed obligation to indemnify the United States. The policy shall also contain a specific provision or rider to the effect that the policy will not be canceled or its provisions changed or deleted before thirty (30) days written notice by the insurance company to the Bureau of Land Management (BLM). The permittee shall indemnify and hold harmless the United States against any liability for personal injury, loss of life, or property damage arising in any way from activities under the permit. Those permittee's holding insurance policies which only insure the permittee and not the permittee's employees must ensure that their employees also have the required insurance in effect. New permits will not be issued, and operations authorized under an existing permit will not be allowed to continue until proper proof of insurance is received by the BLM. This requirement may be satisfied by providing either an authenticated copy of the insurance policy or a certificate of insurance with the original signature of both the permittee and the insurer or their authorized representatives. The name of the insured must be identical with that on the permit application.
16. The permittee will be responsible for the prompt repair of any damages to utilities, fences and other improvements. The permittee shall take every reasonable precaution to protect natural resource values and any improvement on both private and public lands. Gates will be left open or closed, as they were found.
17. The permittee is only allowed to conduct services listed in the SRP and on the BLM lands described in the commercial permit area map.
18. The outfitter is expected to work cooperatively with the IDFG to address wildlife resource management goals for the CMWMA.
19. No permanent camps are allowed on BLM managed lands. If an outfitter wants to propose setting up a permanent camp during a hunt they will have to notify the Cottonwood Field Office at least 9 months prior and provide an exact location of the proposed camp so the BLM can conduct Fisheries, Wildlife, Botany and Archeological inventories before the outfitter is authorized to establish a campsite. Temporary overnight spike camps will be allowed on BLM lands.
20. Operation and maintenance of all sanitation, food service, and water supplies, systems and facilities shall comply with the standards of the local department of health and the United States Public Health Service.

21. Food and/or equipment caches will not be allowed unless prior approval is obtained from BLM's authorized officer. Location of proposed caches must be described in the permit application.
22. All trash will be removed by the permit holder.
23. Fires: Because of the impacts campfires create, their use should be kept to a minimum. Using cook stoves is recommended as an alternative to cooking over campfires. When allowed, campfires shall be small and kept under control. Open fires may be prohibited during certain periods depending on fire danger.
24. No campfires will be left unattended. Permittee is solely responsible for all fires which permittee, employees or clients start.
25. Permittee may be held responsible for fire suppression costs resulting from wildfire caused by permittee, employees or clients.
26. Wildfires should be reported immediately to the Interagency Fire Dispatch Center in Grangeville. Permittee is responsible for informing employees and clients of the current fire danger and required precautions that may be placed in effect by the BLM.
27. Access and Transportation: The permittee is prohibited from inhibiting, limiting or reducing access to public lands within the permit area.
28. The permittee shall abide by all travel plan rules and restrictions for travel including both motorized and non-motorized transportation. Motorized vehicle use would only be authorized on designated roads and trails and no cross-country motorized travel would be authorized on BLM lands. All motorized vehicles need to be cleaned before use on BLM grounds to prevent weed transport.
29. The outfitter or guide must comply with current BLM travel regulations.
30. Permittee is responsible for knowing where Wilderness Study Area boundaries are and use restrictions that may apply to an area of operation within the WSA. Maps and information concerning restrictions are available at the BLM Cottonwood Field Office.
31. Issuance of a permit by BLM does not guarantee legal access to public lands. Where legal public access is not available it is the permittee's responsibility to obtain permission from the landowner(s) to travel through or use private lands or other agency lands.
32. Livestock Use: Use certified "weed-free" feed and straw for all livestock.
33. Construction of permanent fences or corrals is not permitted. Temporary improvement including frames, corrals or hitching racks may be constructed only with prior BLM approval in writing.

34. If stipulations are not adhered to and complied with the BLM will recover all cost associated with the permit such as administrative, cleaning, supplies, vehicle mileage and rental, wages and other costs associated with the permit. BLM can require the permittee to pay for any reclamation and/or rehabilitation requirements.
35. Permittee must not disturb archeological and historic values, including, but not limited to: petroglyphs, ruins, historic buildings and artifacts.
36. These stipulations are in effect until new ones are made or modified. The BLM reserves the right to update or add new stipulations as needed to address resource issues, policy, rules, regulations etc...

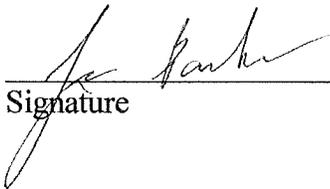
I have reviewed the stipulations above, and I agree to operate under its provisions.

Jon Barker

Print Name

6-30-15

Date



Signature

Appendix B. Response to Public Comments

CMT #	Commentor	Comment	BLM's Response
1-1	Sam Fuchs	Hi, In response to the comment on the Outfitters on Craig Mnt, the comment period of one week seems very short. The first time I heard of it was in the paper last week. The comment period is way to[o] short for an issue of this importance.	The BLM sent notices out about commenting on the environmental assessment (EA) June 24, 2013. The comment period ended July 25, 2013 (30 days). The BLM posted the EA on its NEPA web page and sent letters to 31 different individuals and agencies who had previously commented during the initial scoping period. IDFG asked the BLM to post a notice in the <i>Lewiston Tribune</i> which we did on July 19, 2013. Federal regulations do not specify a time requirement for public comment on an EA. See section 3.1 & 4.1 of the EA.
1-2	Sam Fuchs	The BLM area of Wapsilla Ridge and a significant portion of Unit 11 was acquired from the Nature Conservancy with the agreement that the land would be protected as a minimal impact area by avoiding livestock grazing and commercial activities such as those in this proposed plan. Within that area is some of the best remaining native grasslands that are free from noxious weeds and very few rutted trails .I do not have anything against outfitters where they currently exist but this plan will cause more tension between local hunters and others who feel the area should be free from commercialization of all types. Craig Mnt and adjacent BLM land, is one of the few areas local hunters feel they can readily access and is available to all individuals on an equal basis.	<p>The BLM is not aware of an agreement regarding these types of restrictions of uses on the land acquired from the Nature Conservancy.</p> <p>The MOU between the IDFG, the IDL, the BLM and the Nature Conservancy is located in the Appendix 3 of the Revised EA.</p> <p>The BLM is a multiple use agency operating under the Federal Land Policy and Management Act of 1976. As discussed in Section 1.3 of the Revised EA, the BLM manages the lands involved with this proposal in accordance with the Cottonwood Resource Management Plan (RMP). As discussed in the Revised EA, the RMP specifies the following action for the Craig Mountain Special Recreation Management Area (SRMA):</p> <p>Action RC-1.2.5.1—Issue commercial recreation permits for the Craig Mountain SRMA only with the concurrence of the Idaho Department of Fish and Game.</p> <ul style="list-style-type: none"> • Whenever considering special recreation permits for new or modified activities related to hunting or fishing, BLM will consult with IDFG regarding the need, resource capacity and allocation to the industry.

CMT #	Commentor	Comment	BLM's Response
			Anticipated impacts to resources are disclosed in the Revised EA (Section 3) and stipulations to avoid or mitigate impacts are listed in Appendix 1.
1-3	Sam Fuchs	BLM does not have the resources to enforce or restore the problems that arise with these kinds of commercial activities. Outfitters are able to comb though large number of acres searching for trophy animals and result in pushing animals even farther into extremely difficult areas for local people to hunt. They also leave behind animals that are extremely "jumpy" and difficult to hunt.	Impacts to Recreation were updated and discussed in section 3.2.2 of the Revised EA.
1-4	Sam Fuchs	Mountain bikes disturb nesting birds and other wildlife and create rutted trails that spread more noxious weeds.	<p>Impacts to noxious weeds were updated and discussed in section 3.2.5 of the Revised EA.</p> <p>The Revised EA discusses the BLM Resource Management Plan (RMP) in section 1.3. Also, Appendix 1 states:</p> <p style="padding-left: 40px;">28) The permittee shall abide by all travel plan rules and restrictions for travel including both motorized and non-motorized transportation. Motorized vehicle use would only be authorized on designated roads and trails and no cross-country motorized travel would be authorized on BLM lands. All motorized vehicles need to be cleaned before use on BLM grounds to prevent weed transport.</p> <p>Section 3.2.8 of the Revised EA discloses impacts to wildlife: "The proposed SRP would have stipulations to avoid or minimize any adverse effects to upland and riparian/wetland wildlife habitats. However, disturbance and temporary</p>

CMT #	Commentor	Comment	BLM's Response
			<p>displacement of wildlife may occur from hunting related and other commercial recreational activities.”</p> <p>The Revised EA also recognizes that minor impacts to soils may occur (see section 3.2.5).</p>
2-1	Les London	<p>I would like to comment on the news clip in the Lewiston Tribune. It’s subject outlined the request to allow Craig Mountain to be used for commercial purpose. It talked about Eco Tourism as well as outfitting for hunting purpose. I spoke with the game department and there forecast would add an additional 25 elk tags to a management unit that is already saturated with tags. Listed are the number of tags drawn for this area according to the drawing results for 2013.</p> <p>Hunt 2051, Oct 1 thru 9, 150 tags. Hunt 2052, Oct 10 thru 24, 200 tags. Hunt 2053, Nov.10 thru 24, 175 tags.</p> <p> Add to this the general season for White tail Deer that runs from October 10th to December 1st . Then you have the Mule Deer drawing hunts as follows.</p> <p>Hunt 1002, Oct 10 thru Nov 3, 74 tags. Hunt 1003, Nov. 10 thru Nov 24, 35 tags.</p>	<p>The IDFG controls the number of tags issued to hunters, and this permit will not change that (see Section 3.1 of the Revised EA). Allowing a commercial outfitter to continue commercial use in the area for which he has been permitted and used since 1991 will not result in an increase in the number of tags made available in the GMU. The proposed action will not affect the number of tags for GMU 11. If the outfitter doesn’t have a commercial use permit to hunt, the number of hunt tags will not increase or decrease because the IDFG will still make the tags available to the public for purchase.</p>
2-2	Les London	<p>Add to this the possibility of early snows then you will have Snowmobilers and Cross Country skiers as well as snow shoe folks. Eco Tourism was left to one’s imagination. This suggests to me a day use activity. If it extends overnight what will the campsite situation be? Will it be developed campsites only and if so how will this be regulated?</p>	<p>Impacts to Recreation were updated and discussed in section 3.2.2 of the Revised EA.</p> <p>The EA discusses camping in Appendix 1 which states:</p> <p>19) No permanent camps are allowed on BLM managed lands. If an outfitter wants to propose setting up a permanent camp during a hunt they will have to notify the Cottonwood Field Office at least 9 month prior and provide an exact location of the proposed camp so the BLM can conduct Fisheries, Wildlife, Botany and Archeological inventories before the outfitter is authorized to establish a campsite. Temporary</p>

CMT #	Commentor	Comment	BLM's Response
			overnight spike camps will be allowed.
2-3	Les London	I know a single outfitter has been operating on Craig Mountain for a number of years and has caused little conflict. Will the addition of expanded commercial operations tax an already saturated area?	<p>The proposed action (section 2.1) was updated in the Revised EA to allow 7 hunters annually and up to 20 clients for day hikes, mountain bike tours, photography, and backpacking trips annually. The current BLM permit for commercial uses does not restrict the number of clients; however, the new permit will now cap the number of clients the permittee can take out. The new permit will not expand commercial use operation; rather it will restrict current use and operations.</p> <p>See section 1.1 of the Revised EA regarding the background of this SRP.</p>
3-1	Jim McIver	I also don't know if the purpose of BLM land is to afford and outfit a living.	See section 1.2 of the EA.
3-2	Jim McIver	Is any of the land fish and game land?	The proposed action would only authorize activities for BLM managed lands. See map #3 of the Revised EA for the proposed operating area. BLM has no jurisdiction for other agency lands located within the proposed hunt area. Contact IDFG regarding permits on IDFG lands.
4-1	Don Vogel	BLM Officials, I would like to go on record as STRONGLY opposing the BLM plan to issue a permit to Barker trophy hunts. It seems that he has been operating illegally on this piece of land for 20 plus years. To issue this permit now would be condoning his past actions.	See section 1.1 of the Revised EA regarding the background of this SRP. Also the BLM is not aware of any illegal activities with Barker Trophy hunts.
4-2	Don Vogel	If the BLM is going to issue a permit for hunting, it should be offered to other Outfitters that previously guided hunts for big game on Craig Mountain. The first Outfitter to hunt this land was Everett Spaulding in the 1960's and as I understand it, Barkers stepped in the 1980's and	See section 3.1 of the EA. Barker Trophy Hunt is currently the only BLM permitted outfitter in GMU 11 and has had a BLM permit for commercial use since 1991 (see section 1.1 of the revised EA). The BLM does not authorize overlapping of commercial hunting areas for

CMT #	Commentor	Comment	BLM's Response
		<p>proceeded to make the area their own hunting grounds. Dave Bream bought Spaulding's Business and hunted for 20 +/- years until 1999 when VOA bought the Business from him and continued hunting until F&G would not sign the Land Managers sign off sheet.</p> <p>On two occasions Jon Barker offered to buy out VOA Big Game hunting operation, and when declined he was able to convince the Idaho Fish and Game, and the IOGLB to not issue our permit to be licensed. We have had conversations with hunters that have had unprofessional/unethical experiences with J. Barker. An example is the story of the sheep hunter transported via helicopter to kill a Bighorn sheep.</p>	<p>the same big game species. Also, in order to qualify for a commercial use special recreation permit – an individual must have a valid commercial license issued by the IOGLB for that area.</p>
4-3	Don Vogel	<p>Another concern is the short timeframe for public comment on this important matter - inclusion in the outdoor section of the Lewiston Tribune should have occurred 3 weeks prior to comment deadline.</p> <p>Thank you for your time.</p>	<p>See response to Comment 1-1 above.</p>
5-1	Janice Hill	<p>The largest population of the federally-listed Threatened plant species <i>Silene spaldingii</i> (Spalding's catchfly) occurs within the canyon grasslands of the proposed area for a SRP in the GMU 11 in the CMWMA on both 1) BLM land on the 14,000-acre Garden Creek Ranch that is cooperatively managed by the BLM and The Nature Conservancy (approximately 4,000 plants) and 2) ID Fish and Game land in Madden Creek, Captain John Creek, Camp Creek and Billy Creek (approximately 500 plants). It is likely that these plant numbers are much higher due to considerable acres of suitable, unsurveyed habitat remaining in these areas. Due to the steep terrain that has curtailed development, the canyon grasslands represent the largest remaining contiguous and intact habitat for this species and have been designated as a Key Conservation Area for recovery of this threatened species by the US Fish and Wildlife Service.</p> <p>Within the canyon grasslands, numerous, small populations of <i>Silene spaldingii</i> occur across the landscape in relatively good-</p>	<p>The Revised EA only address's commercial use for BLM managed lands.</p> <p>Section 3.2.6 of the Revised EA recognizes that “the largest population of Spalding’s catchfly in Idaho occurs on BLM lands within the CMWMA (GMU 11). The outfitter has been operating in this area since 1991 and no adverse effects from such use have been documented. It is expected that discountable vegetation and soil disturbance would occur from off-road non-motorized access, and a “no effect” determination has been concluded for ESA-listed <i>Silene spaldingii</i>.</p> <p>The Revised EA discusses stipulations in Appendix 1 which states: 28. The permittee shall abide by all travel plan rules and restrictions for travel including both motorized and non-motorized transportation. Motorized vehicle use would only be</p>

CMT #	Commentor	Comment	BLM's Response
		<p>condition, mesic bunchgrass communities on northerly-facing slopes from ~1,400 ft to ~4,000 ft. Due to the highly dissected nature of the terrain, these mesic bunchgrass communities are directly adjacent to and alternate with the more xeric bunchgrass communities on southerly-facing slopes that are highly infested with yellow starthistle and cheatgrass. At Garden Creek Ranch, <i>Silene spaldingii</i> occurs within the three major drainages (Corral Creek, China Garden Creek, and Cave Gulch) with the majority of know occurrences in the Corral Creek drainage and small drainages to the north (the North Benches) The additional off-road/off-trail hiking and horseback use (and any unauthorized ORV use) that will occur with this proposed action has high potential to create soil disturbance and transfer weed seeds from the highly infested xeric areas into adjacent good-condition mesic communities supporting <i>Silene spaldingii</i>. This species cannot persist within highly infested areas. There is also potential for people unfamiliar with the known locations and identification of this plant species to unknowingly trample and destroy plants. It is not an easy plant to notice or identify. ORV use would supposedly be confined to roadways, but how do you intend to prevent un-authorized use of ORVs in off-road areas?</p>	<p>authorized on designated roads and trails and no cross-country motorized travel would be authorized on BLM lands. All motorized vehicles need to be cleaned before use on BLM grounds to prevent weed transport.</p> <p>Also, as stated in Appendix 1 Stipulation #2, “The authorized office may suspend or terminate a SRP if necessary to protect public resources, health, safety, the environment, or because of noncompliance with permit stipulations.”</p>
5-2	Janice Hill	<p>Another concern I have is I do not notice any collaboration, information sharing, or input from The Nature Conservancy, a primary land-owner/manager at Garden Creek Ranch. What is their position on this proposal?</p>	<p>The BLM send a scoping letter to the Nature Conservancy and received no comments from them. We also sent scoping letters to all the private landowners for GMU 11. See section 3.1 & 4.1 of the Revised EA about scoping and distribution of the EA.</p>
5-3	Janice Hill	<p>I contend this proposed action has high potential to produce negative effects on the Threatened <i>Silene spaldingii</i> and the largest remaining contiguous and intact habitat for this species. Public access at Garden Creek Ranch, including the Corral Creek drainages and small drainages to the north (North Benches), should remain as non-motorized.</p>	<p>See section 3.2.6 of the Revised EA, and the response to Comment 5-1 above.</p> <p>The proposed action is authorizing commercial use on BLM lands located in the proposed commercial use area. The BLM is not changing, authorizing or amending travel management. The public lands in the Corral Creek drainage and North Benches will continue to remain non-motorized.</p>

CMT #	Commentor	Comment	BLM's Response
			The outfitter has been operating in this area since 1991 and no adverse effects from such use have been documented. It is expected that discountable vegetation and soil disturbance would occur from off-road non-motorized access, and a “no effect” determination has been concluded for ESA-listed <i>Silene spaldingii</i> .
6-1	Friends of the Clearwater	A proposal from an applicant is not enough to generate a need. The BLM needs to determine whether a real need exists and, if so, whether that use would conflict with existing uses. For example, the EA notes private individuals didn't need guide services for the bighorn sheep hunts in the area the last year reported in the EA (2011).	The need for the proposed action is described in Section 1.2 of the Revised EA. The need for this type of use is established in the RMP direction for this SRMA. See section 1.1 of the EA.
6-2	Friends of the Clearwater	The EA should have looked at the scope of this project in context of adjacent land. While Idaho Department of Fish and Game wants outfitting and possibly mountain biking in the area, is that true of the private land set aside for conservation purposes?	See section 4.1 of the Revised EA. The proposed action would only occur on BLM managed lands. BLM coordinated with the IDGF about this commercial outfitter and the IDFG also permits some commercial activities for this same outfitter on IDFG lands located in the same proposed commercial use area boundary. The BLM recognized the IDFG permit when we eliminated an alternative from detailed analysis that would have expanded use into other areas of BLM, which would have been in conflict with the area permitted for this outfitter by IDFG (see EA Section 2.3). See comment 1-2
6-3	Friends of the Clearwater	What about any agreements for land BLM obtained in the area? It was our understanding these activities were not going to be allowed on this acquired land. Please clarify this issue.	See comment 1-2

CMT #	Commentor	Comment	BLM's Response
6-4	Friends of the Clearwater	The EA should have looked at a range of alternatives. For example, an alternative that doesn't grant an SRP in all or parts of the special management units--WSAs, and ACECs--should be considered. The EA also needs to objectively evaluate alternatives. Such an alternative should have been included. The EA's rejection of a partial alternative is very odd.	<p>See section 2.1, 2.2 & 2.3 of the EA regarding alternatives.</p> <p>There are no WSA's located in the proposed commercial use operating area.</p> <p>Not permitting commercial use on WSA's and ACEC's was considered and removed from further analysis (see EA section 2.3).</p> <p>Permit stipulation in the EA – Appendix 1 are expected to minimize potential for any adverse impacts to special resources values associated with ACECs. No adverse effects are expected to occur to designated ACECs within the analysis area.</p>
6-5	Friends of the Clearwater	How are conflicts with adjacent private landowners going to be dealt with if they arise? Why couldn't an alternative have been crafted that avoids these areas?	<p>Because of the stipulations (see Appendix 1 of the EA) we do not anticipate conflicts with adjacent landowner. If conflicts arise we can modify stipulations to deal with issues and resource concerns.</p> <p>See section 2.3 of EA describing why the alternative was eliminated from further analysis.</p>
7-1	Idaho Conservation League	We are concerned about the possible conflict with non-commercial interests of the Craig Mountain SRMA, which according to the 2009 Approved Cottonwood RMP, is an area that shall be managed as an undeveloped recreation tourism market. Careful consideration should be given to ensure that all users have access to high quality recreation opportunities.	See section 1.3 of the EA referring to Conformance with Land Use Plan.
7-2	Idaho Conservation League	We also wish to highlight the importance of Areas of Critical Environmental Concern such as the Lower Salmon River, Captain John Creek and Wapshilla Ridge. The BLM should ensure that all outfitter activities are consistent with protecting and preserving the qualities of these ACECs.	<p>See comment 6-4.</p> <p>Also see EA Appendix 1, additional permit stipulations which address resource protection.</p>
7-3	Idaho Conservation League	The BLM should also ensure that all OHV travel by outfitters is consistent with travel management plans and encourage outfitters to report any illegal motorized uses or resource damage.	See comment 1-4.

CMT #	Commentor	Comment	BLM's Response
8-1	IDFG	<p>The Proposed Action in your Special Recreation Permit (SRP) is confusing. On Page 5 it states actual proposed numbers for guided hunters and proposed numbers of clients for non-consumptive uses. However, #2 in Appendix 1 states “At this time there are no use restrictions on the number of clients the outfitter (may) take for each activity”. As we interpret the Proposed Action it would permit Barker Trophy Hunts (BTH) for commercial outfitting to include “approximately 25” clients for hunting as well as 5 clients each for mountain biking, day hiking, photography tours, and backpacking trips (approximately 45 clients/year) across 25,182 acres of BLM lands on Craig Mountain in Game Management Unit (GMU) 11.</p>	<p>See changes to section 2.1 of the EA and to Appendix 1 which now specifies the limit on the number of clients the same as the proposed action.</p> <p>The permit specifications have been changed in the decision record and EA as requested by IDFG prior to their concurrence.</p>
8-2	IDFG	<p>Idaho Department of Fish and Game (IDFG) does not concur with your Proposed Action. It is our opinion that the proposed action is based on erroneous assumptions, and is inconsistent with current interagency agreements and resource management goals.</p> <p>In particular, IDFG’s opinion is:</p> <ul style="list-style-type: none"> • That the assumptions and proposals in the EA fail to meet the letter and intent of the 1997 Craig Mountain MOU and are not consistent with the 2009 Cottonwood Resource Management Plan (RMP). 	<p>The permit specifications have been changed in the decision record and EA as requested by IDFG prior to their concurrence.</p> <p>In reference to the 1997 Craig Mountain MOU – The MOU states “The organizations represented in this MOU recognize that they each have distinct missions and unique abilities.” The proposed action is consistent with BLM’s mission under section II Partnership Mission Statements c. “It is the mission of the BLM to sustain the health, diversity, and productivity of the public lands for the use and enjoyment of the present and future generations.”</p> <p>See section 1.2 & 1.3 of the EA.</p>
8-3	IDFG	<p><u>Special Recreation Permit EA Referenced Comments</u></p> <p>Reference: 3.1 Scope of Analysis, page 7:</p> <ul style="list-style-type: none"> • <i>Too much public hunting pressure on public lands. The proposed action would allow one commercial outfitter for the proposed commercial use area in GMU 11. IDFG regulates the number of big game</i> 	<p>See correction to page 7 of the EA, “licenses” has been replaced with “tags.”</p> <p>See EA section 3.2.2 for changes.</p> <p>BLM does not manage big game tags or harvest opportunities.</p> <p>IDFG should only issue as many tags for big game hunting as</p>

CMT #	Commentor	Comment	BLM's Response
		<p><i>licenses for GMU 11 so the numbers of licenses are issued regardless of commercial or non-commercial use.</i></p> <p>We are confused by the latter part of this statement. IDFG does not regulate numbers of “big game licenses” for Unit 11, or elsewhere in the state. If you are referring to tag numbers for GMU 11, we disagree that the hunting pressure imposed by the outfitted public is equal to that by the non-outfitted public. As is stated on page 9 of the EA:</p> <p><i>The group size and number of groups for hunting is approximately 4-8 clients with 5-6 guides and 3 camp helpers (camps are located on IDL or IDFG lands). Approximately 4 groups per year. Sometimes the permittee will have 1-2 hunts where it is just 1 client and 2-3 guides as it varies each year. It should be noted that clients may be together in camp, but not all of them would ever be together in the field, they go to different spots each day.</i></p> <p>When each outfitted hunter is associated with multiple guides, the effect on the recreational and natural resources is substantially higher, in camp and in the field, than is imposed by a typical non-outfitted hunter. The number and type of tags permitted for a GMU are used in part to manage game populations and success rates of hunters are used as part of the estimated population trajectory. Increasing the number of allowed outfitted hunters by ‘approximately 25’ clients will have a noticeable effect on harvest rates in GMU 11.</p> <ul style="list-style-type: none"> • Generally, success rates of outfitted hunters are much higher than that of the non-outfitted hunter. • Outfitted hunters, with multiple guides, have a greater potential to (and often do) harvest trophy animals. <p>Increasing the number of allowed outfitted hunters by</p>	<p>they want animals taken.</p> <p>The BLM has never had any restrictions on the number of commercial hunters that Barker Trophy Hunts could take in the past. This EA now restricts the maximum number of outfitter clients that Barker Trophy Hunts can take.</p>

CMT #	Commentor	Comment	BLM's Response
		<p>“approximately 25” will dramatically affect the abundance and quality of trophy animals in GMU 11.</p> <ul style="list-style-type: none"> • The cumulative effects of “approximately 25” additional outfitted hunters, along with multiple guides, would create a significantly greater footprint on the natural resources, recreational opportunities for non-outfitted public, as well as management and enforcement needs by multiple agencies. <p>IDFG believes the number of outfitted clients and associated guiding services allowed in the Proposed Action would have significant impacts and a “no effect” decision is incorrect (and not supported by the facts).</p>	
8-4	IDFG	<p>EA Reference: 3.1.3 Assumptions Hunting Related Activities, page 9:</p> <ul style="list-style-type: none"> • <i>Season of occurrence for hunting is currently August 30th to December 31. The permittee is also out scouting all times of the year.</i> <p>Scouting by a commercial outfitter is a commercial activity and should be limited to the season of occurrence allowed for hunting. IDFG and IDL permit BTH to start commercial hunting activities no sooner than 7 days prior to the start of the Controlled Any-Weapon bighorn sheep hunt in Unit 11, which currently starts August 30. BTH is not permitted on IDFG lands after the big game Controlled Any-Weapon hunts, which currently end on November 24.</p> <p>IDFG recommends that you change the proposed BLM permit to better reflect the time periods and hunts allowed within the IDFG and IDL permits for BTH.</p>	<p>Since the BLM permit would also allow non-hunting activities between April and November, it would be impractical to enforce no scouting during this period. The proposed action (section 2.1) was updated in the Revised EA to specify that scouting is allowed during any part of the permitted use period.</p> <p>The assumptions (section 3.1.1) were also updated in Revised EA to reflect this.</p>

CMT #	Commentor	Comment	BLM's Response
8-5	IDFG	<p>EA Reference: 3.1.3 Assumptions Hunting Related Activities, page 9:</p> <ul style="list-style-type: none"> • <i>Type of hunting will include rifle, shotgun, black powder, and bow.</i> <p>BTH is permitted by IDFG and IDL for commercial use for up to 3 bighorn sheep, 4 deer, and 10 elk during the Controlled Any-Weapon hunts only and for the incidental take of forest grouse. Specifically, BTH is not permitted to hunt during the black powder only season. Secondly, there is no archery only (bow) season in GMU 11 and IDFG has no intent to permit BTH if an archery only season is ever initiated. The Proposed Action does not specify hunter numbers or hunts, theoretically creating a situation where a hunter could be outfitted for multiple species or numerous big game seasons.</p> <p>IDFG recommends the BLM permit reflect the IDFG seasons and weapon types. Doing otherwise would allow for guiding services at many times of the year and several hunting seasons during which BTH is currently restricted from IDFG lands. Also, expanding dates of access for either hunting or non-consumptive activities can be expected to have a greater effect on resources and created increased conflicts with non-outfitted recreation.</p>	<p>Barker Trophy Hunts is restricted for the time of year they can hunt on BLM lands. They are licensed by the IOGLB to commercially hunt in there licensed area with approval from land managing agencies.</p> <p>The first stipulation in Appendix 1 of the EA (page 1-1) states that the ‘the permittee shall comply with all Federal, State, and local laws; ordinances; regulations; orders...’ Hence, BTH is required to comply with IDFG hunting seasons and other rules governing hunting in GMU 11.</p> <p>See the Revised EA section 3.1.3 for change in assumptions.</p> <p>The BLM is not expanding the dates of access for hunting or non-consumptive activities. The BLM has been permitting Barker Trophy Hunts on BLM land in GMU 11 since 1991 with no restrictions on use or access to BLM lands and no problems were reported to us.</p> <p>The BLM permit stipulation in Appendix 1 can be changed or modified at any given time to address new resource concerns should they arise.</p>
8-6	IDGF	<p>EA Reference: 3.1.3 Assumptions Day hikes, mountain bike tours, photography, and backpacking trips, page 10</p> <ul style="list-style-type: none"> • <i>Season of occurrence is April through November</i> <p>The CMWMA is a popular place for black bear and wild turkey hunting. With the season of occurrence for commercial non-consumptive activities, like mountain biking, proposed in the EA we anticipate conflicts with existing non-outfitted public uses throughout the Craig Mountain Area.</p>	<p>See the Revised EA section 3.1.3 for changes to assumptions. .</p> <p>See the Revised EA section 1.3.</p> <p>See the response to Comment 1-4 above.</p> <p>See the Revised EA Recreation section 3.2.2 for changes.</p>

CMT #	Commentor	Comment	BLM's Response
8-7	IDFG	<ul style="list-style-type: none"> <i>Usually most of the trips are day hikes/trips. On occasion they might set up 2 temporary spike camps per season on non-BLM lands.</i> <p>BLM should not assume that BTH is allowed to set up camps (or conduct any other activities) on lands owned and managed by other agencies. For instance, BTH is not permitted for commercial activities on IDFG and IDL lands before August 23rd. In addition, it has been determined by IDFG that commercial outfitting for non-consumptive activities is not needed in the Craig Mountain Area. IDFG's opinion on this matter was supported in legal hearings and is reflected in a formally negotiated agreement between BTH and IDFG that excludes those activities.</p> <p>BTH is not permitted for such uses by IDFG or IDL and requests from BTH to use IDFG land to access or support activities on BLM will be denied.</p> <p>IDFG recommends that you not allow BTH to be permitted for these non-consumptive non-hunting related uses. We recommend your permit stipulate that BTH cannot camp or cross other land ownerships to enter BLM lands without permission from the landowner.</p>	<p>See the Revised EA section 3.1.3 for changes to assumptions.</p> <p>BLM doesn't authorize or manage other agencies or private lands for Barker Trophy Hunts. See stipulations #14 & 17 under Appendix 1 of the Revised EA.</p> <p>The proposed commercial activities are consistent with the BLM Cottonwood RMP (see section 1.3 of the Revised EA). Development of the RMP included a considerable public process.</p> <p>See stipulation #14 & 31 which addresses accessing other lands.</p>
8-8	IDFG	<p>EA Reference 3.2.2 Special Recreation Management Areas (SMRA's), proposed action, page 12</p> <ul style="list-style-type: none"> <i>There would be no permanent hunting camps established in these areas...</i> 	<p>No permanent camps are allowed on BLM lands without prior clearance, see Appendix 1 stipulation # 19.</p> <p>Spike Camps are allowed on BLM lands.</p> <p>The Revised EA proposed action section 2.1 has been changed</p>

CMT #	Commentor	Comment	BLM's Response
		<p>The Proposed Action assumes that there will be no detrimental effects to natural resources on the SMRA because any spike camps or permanent camps will be on non-BLM properties. We believe the analysis in the EA inadequately addresses the potential negative impacts that such large increases of commercial use can be expected to have on non-BLM lands.</p>	<p>to address these points.</p> <p>The BLM has no control over private or commercial camps allowed on other agency or private lands. Barker Trophy Hunts did not ask for hunt camps on BLM lands, only spike camps. The BLM allows camping by private public users on BLM lands; the only difference between a private camp and commercial is that commercial camps are usually held to a higher standard with permit stipulations.</p>
8-9	IDFG	<p>EA Reference 3.2.2 Special Recreation Management Areas (SMRA's), proposed action, page 12</p> <ul style="list-style-type: none"> • <i>The potential effects of the SRP on the recreational values would be more people using the area for the described activities, but the activities have been occurring under an SRP in the past with no additional effects.</i> <p>The non-consumptive activities proposed in the SRP have not been permitted by IDFG and IDL across 71% of the boundary permitted for BTH. The indeterminate number of hunting clients proposed to be permitted in the SRP across 29% of the public land within the permitted boundary has the potential to dramatically increase commercially outfitted hunters from historic, established, or existing levels of use.</p>	<p>The BLM has been permitting Barker Trophy Hunts on BLM land in GMU 11 since 1991 with no restrictions on use or access to BLM lands and the effects identified in the EA reflect observations of this past use.</p> <p>See the Revised EA section 1.3.</p> <p>See the Revised EA section 3.2.2 which was changed.</p> <p>The Revised EA proposed action section 2.1 was changed. Use is being restricted – not increased.</p> <p>The BLM is only proposing commercial use on BLM managed land per Appendix 1 stipulation #17 of the Revised EA.</p>
8-10	IDFG	<p>EA Reference 3.2.4 Recreation Affected Environment, page 14</p> <ul style="list-style-type: none"> • <i>The BLM does not currently have data for how much use occurs in the area other than the approximate 25 commercial clients each year.</i> 	<p>See the Revised EA section 1.2 of the EA purpose and need which was changed to address this comment. See the response to Comment 2-3 above.</p> <p>See the response to Comment 8-8 above.</p> <p>The 25 commercial clients are what BTH asked for. The IDFG's</p>

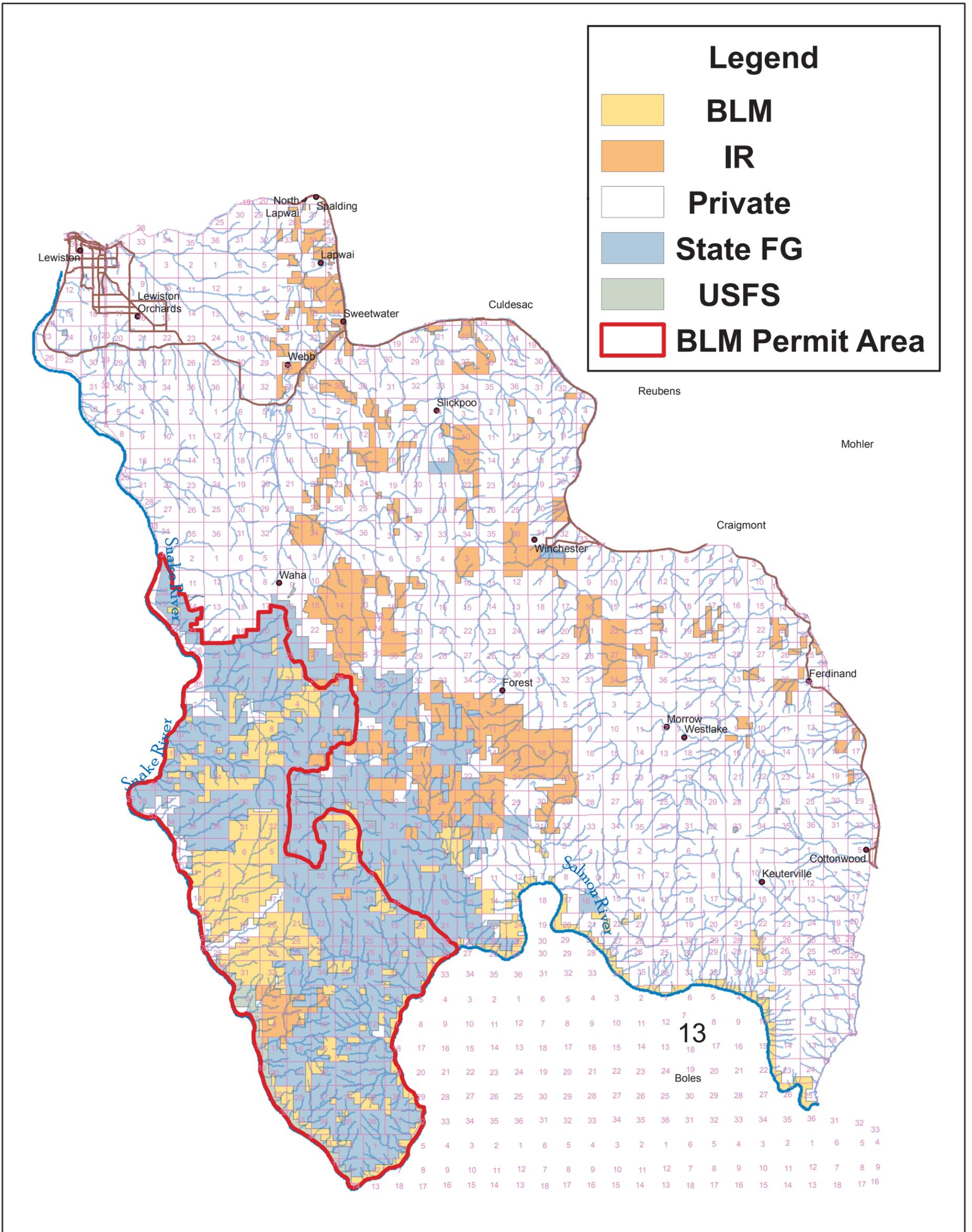
CMT #	Commentor	Comment	BLM's Response																					
		<p>IDFG <i>does have</i> current use data, and our data indicates that 25 commercial clients is a gross overestimate of current use: At this time, IDFG and IDL (collectively) permit BTH up to 10 elk, 4 deer, and 3 bighorn sheep clients across 71% of the public land within the permitted boundary. BTH is permitted one base camp on IDFG. Year-end reports submitted to IDFG by BTH are required to list each client for which commercial services are provided and the primary service provided on IDFG lands. BTH is currently permitted to camp on IDFG lands and cross IDFG lands to access BLM property within the SRMP; however these clients and the primary services (<i>e.g.</i>, camping, crossing) must be reported to IDFG in the year-end report. The following data from the last three year's reports provided by BTH to IDFG suggest that current hunting use on BLM lands is substantially lower than the 'approximately 25' suggested in the above statement and throughout the EA.</p> <table border="1" data-bbox="428 818 1698 1024"> <thead> <tr> <th>Year</th> <th>Elk Clients</th> <th>Deer Clients</th> <th>Sheep Clients</th> <th>Clients camping and crossing IDFG to access BLM</th> </tr> </thead> <tbody> <tr> <td>2010</td> <td>10</td> <td>4</td> <td>2</td> <td>2</td> </tr> <tr> <td>2011</td> <td>10</td> <td>4</td> <td>0</td> <td>2</td> </tr> <tr> <td>2012</td> <td>10</td> <td>1</td> <td>0</td> <td>0</td> </tr> </tbody> </table> <p>We suggest your assumption of approximately 25 past clients per year is highly over estimated and that adoption of the Proposed Action will encourage more commercial use than is currently occurring, with consequential increased impacts to resources and recreation. We recommend that your number for outfitted clients reflect IDFG's permit numbers for each activity. IDFG has established permit numbers (17 outfitted clients) which we believe insure low to no effect on the resources or to other recreational users for the amount of acres (62, 093 acres) available on state lands in the permitted boundary. Based on the acres of BLM lands within the permit</p>	Year	Elk Clients	Deer Clients	Sheep Clients	Clients camping and crossing IDFG to access BLM	2010	10	4	2	2	2011	10	4	0	2	2012	10	1	0	0	<p>numbers only include the number of hunters who had to cross IDFG land to hunt on BLM lands. This is not the total number of hunters on BLM lands,</p> <p>These numbers are not an accurate representation for BTH use on BLM lands.</p>	
Year	Elk Clients	Deer Clients	Sheep Clients	Clients camping and crossing IDFG to access BLM																				
2010	10	4	2	2																				
2011	10	4	0	2																				
2012	10	1	0	0																				

CMT #	Commentor	Comment	BLM's Response
		<p>boundary (25,182 acres), we suggest the number of outfitted hunter clients allowed on BLM lands should not to exceed 7 per year. Consistency with IDFG's permit numbers is also consistent with the approved goals and intent of the BLM 2009 Resource Management Plan for the Craig Mountain SMRA and with the IDFG Management Plan for Craig Mountain WMA.</p>	
8-11	IDFG	<p>EA Reference 3.2.4 Recreation Proposed Action, page 14</p> <ul style="list-style-type: none"> <i>There would be no impacts to recreational use or SRMA values.</i> <p>IDFG disagrees with the conclusion that there would be no impacts to recreational use or SRMA values, nor does the EA present sufficient information to draw this conclusion. The SRMA comprises approximately 29% of the public land within the permitted boundary for BTH in GMU 11. The remaining 71% of public land is owned and/or managed by IDFG and IDL. Through legal hearings and formal negotiations between BTH and IDFG it was determined that the recreational and wildlife resources across IDFG and IDL lands within this boundary could sustain 17 outfitted hunting clients. Based on the estimate of 'approximately 25 hunters' the proposed SRP would allow 147% additional outfitted hunters over what IDFG and IDL determined were sufficient for the boundary area and was supported by the court and reflected in our agreement with BTH. The proposed action would result in a tremendous increase in the pressure on wildlife, competition among hunters, and harvest of trophy quality animals, especially when you consider the over-all footprint imposed by a commercially outfitted hunter with 2-6 guides. If this increase results in a negative effect to the resource or recreational opportunities, IDFG would need to consider an adjustment of overall tag numbers for GMU 11.</p>	<p>See the Revised EA section 2.1 for changes to the proposed action, decreasing the number of hunter clients allowed.</p> <p>The BLM is only proposing commercial use on BLM managed land per Appendix 1 stipulation #17 of the Revised EA.</p> <p>The permit specifications have been changed in the decision record and the Revised EA, as requested by IDFG prior to their concurrence.</p> <p>See the Revised EA section 1.3 Conformance with Land Use Plan.</p> <p>See the Revised EA section 3.2.2, which was changed to address these points.</p>

CMT #	Commentor	Comment	BLM's Response
		<p>Throughout 2012, IDFG conducted a public survey regarding the management of Craig Mountain Wildlife Management Area. Among many other questions regarding management of CMWMA, the following question was asked regarding commercial use on state WMAs: <i>Should IDFG continue to allow commercial outfitting on WMAs?</i> Surveyed individuals were asked to answer this question on a scale of 0-10, with 0 being “do not allow commercial outfitting,” to 10 being “continue to allow commercial outfitting.” We received 308 responses to this question with an overall rating of 3.61. Essentially, of the general public: 54.55% feel commercial outfitting is not appropriate for Idaho WMA’s (based on answers 0-3), and 23.70% feel commercial outfitting is appropriate on Idaho WMA’s (based on answers 7-10).</p> <p>The Proposed Action would increase outfitted hunting on CMWMA by approximately 147% over what IDFG and IDL determined is sufficient for the boundary area and an additional 20 clients per year for non-consumptive activities. IDFG feels the proposed action is not compatible with the resources available and would drastically affect recreational opportunities on the SRMP and throughout CMWMA. The Proposed Action does not concur with the estimated effects determined by IDFG and IDL and is out-of-sync with public opinion about how the Craig Mountain Area should be managed.</p>	
9-1	Jon Barker	<p>Thanks for all of the hard work you and the team have gone through to create such a thorough document. I want to be on the record approving the issuance of the permit and the option to allow outfitting on this assessment.</p> <p>The only inconsistency that I saw in the document is the discrepancy to spike camps. We have discussed this is an approved activity for years on BLM lands due to the vastness of</p>	Thanks for pointing out the typo error – the non-BLM lands have been changed to BLM lands in the Revised EA.

CMT #	Commentor	Comment	BLM's Response
		<p>the terrain. On page 35 of the document section 19, it states "temporary overnight spike camps will be allowed"</p> <p>I believe there may just be typos in other areas of the document in regards to spike camps, but I will bring them to your attention.</p> <p>On page 9 the last paragraph, says 2 to 3 spike camps on non-BLM lands. The non should be removed. On page 10 the 4th bullet point, states temporary spike camps per season on non-BLM lands. The non in this sentence should be omitted.</p>	

BARKER TROPHY HUNTS SRP AREA DESCRIPTION



The surface management status ("land ownership") should be used as a general guide only. Official land records, located at the Bureau of Land Management (BLM) and other offices, should be checked for up-to-date information concerning any specific tract of land.

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