

## **Comments from a Professional Geologist/Environmental Scientist**

### **Summary**

I am against the transfer of ownership and management of Federal lands to the control of the State of Idaho and administered by the Idaho Department of Lands (IDL). I do not think that this transfer of lands will be beneficial to the stewardship of these publicly held areas due to the long history and continuity of Federal oversight; and the experience, funding, and checks and balances that have been developed to analyze and protect the interests of responsible public ownership ranging from citizens to corporate land users.

### **My Questions and Concerns**

These were the questions that crossed my mind in evaluating your proposal!

1) What are the revenues and their sources, expenditures, budget, and staffing requirements of the current Idaho Department of Lands (IDL) assuming no assimilation of Federal lands by the State of Idaho?

1a) What are your future yearly budget/forecast/plans/(See question 1 above) for the IDL assuming "No Action" on acquiring these Federal Lands?

2) The IDL currently manages approximately 2.5 millions acres in Idaho. How many acres of Federal land are you anticipating taking control of? When are the detailed locations of these acquisitions and the purpose behind transferring ownership? Are you after all of the 33 million acres of Federal lands in Idaho or just selected parcels?

3) What are your short and long-term plans for these new additions?

4) Please answer the same questions in 1 and 1a (see above) based on the addition of Federal lands.

5) Are your plans to provide sustainable revenues generated from these new areas; or is your plan to divest certain parcels into private ownership as a means of managing these acquired lands?

5a) Who will decide on the plans/policies/budget of all Idaho state lands before and after the acquisition?

5b) Will the citizens of Idaho have a contribution to any decision-making processes in acquiring, divesting, funding, and managing these new Federal lands?

5c) Please provide the current concept of where these lands will be added and how they will be administered?

5d) Can the IDL reasonably react to administering and staffing up to 14.2 times (2.5M to 35.5M) it's jurisdiction of an increased public land base? How quickly can these changes been incorporated into the State of Idaho and IDL's plans/budget/funding?

6) Currently, these Federal lands are administered, funded, and managed by multi-agency involvement and cooperation (Federal/state/local) with input from corporate land-users and citizen groups. There are long established policies, plans, funding sources; and checks and balances of how the decision-making process proceeds. Under what framework do you see these new lands being controlled by the IDL?

7) Are there contingency funds for such things as wildfire suppression, infrastructure requirements, liability of the general public while on IDL lands, legal mitigations of various lawsuit, etc that could be generated of these newly acquired lands?

8) Will funding for education, social services, infrastructure, health care, etc be potentially decreased due to assimilating these Federal lands and issues that may arise from them?

9) Has the State of Idaho done any Risk/Reward Analysis on taking this action? Can the public access this document and comment on the validity of the assessment?

10) Putting aside all political agendas, what are your personal/moral/ethical values/views about supporting this proposed action?

Honorably,

Bill Keis

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30 year career of developing natural resources responsibly from both sides of the fence (developers and environmentalists)