

APPENDIX E. LEWISTOWN RMP SCOPING COMMENT MATRIX

8/29/2014

COMMENT/ SEQUENTIAL NUMBERS	PLANNING ISSUE CATEGORIES										COMMENT	COMMENT WILL BE ADDRESSED IN RMP	COMMENT PRESENTS A NEW ISSUE & WILL BE ADDRESSED IN RMP	COMMENT FURTHER REFINES AN EXISTING ISSUE & WILL BE ADDRESSED IN RMP	COMMENT WILL NOT BE ADDRESSED	COMMENT IS BEYOND SCOPE OF RMP	BETTER ADDRESSED ADMINISTRATIV ELY OR AT A LOWER LEVEL OF PLANNING	DUPLICATE COMMENT (DC)	REFERENCE ONLY	DATA SOURCES AND/OR ADDITIONAL INFORMATION AND/OR PLANNING CRITERIA	CATEGORY (B = Business; CY = County; I= Ind.; F = Federal; O = NGO; ST - State; T =	FORM LETTER (FL)	
S-0001-01	LG										Stop all grazing of cattle on these lands.	1									I		
S-0001-02	LG										Taxpayers have been ripped off for almost a hundred years by robber baron cattle ranchers who pay cheap rates for using American lands. They should have to go rent the private lands and pay the rates that are usual and customary. BLM gives these robber baron cattle ranchers cheap rates, to cheat the average American.					1						I	
S-0001-03	AA	FM									Stop all the burning because it pollutes the air with releasing fine, particulate matter which causes lung cancer, heart attacks, strokes, pneumonia, allergies and asthma. It's time to stop giving us bad air to breathe to kill us. That air comes east across the rest of America.					1						I	
S-0001-04	FW	RV									No animal should be raised to be shot to death. They have a right to life because they are part of the ecology of earth. Letting gun wackos loose is letting loonies loose on earth.					1						I	
S-0001-05	FW	RV									This is national land, not state land. The MT State Fish & Game grows wildlife to kill it. That is not national policy. MT game agency is a vicious manipulative game agency working solely for gun wacko pleasure at killing. I oppose all wildlife murder on this site. Animals need peace and tranquility to survive with climate change coming.					1						I	
S-0001-06	FM	FP									Stop completely the logging and burning of this site so that gov't agency employees can make extra money. That is what prompts them to burn. They even set the fires themselves to get that extra overtime.	1								Need further clarification		I	
S-0002-01											Nonsubstantive comment (comment form consisted of mailing list and other nonsubstantive information).								1	Contact added to mailing list		F	
S-0003-01	SD	TM									Regarding the 4 "Outstanding Natural Areas" on the Rocky Mountain Front: I have hiked and snowshoed in these areas many times. They are national treasures. I urge you to keep these areas wild and undeveloped. Please allow no motor vehicles here except on those roads that access the borders of the areas.	1										I	
S-0003-02	ME										Please do not allow any oil and gas and hard rock mineral development.					1						I	
S-0003-03	SD	WC									The areas should be preserved as wild as possible in hopes that one day they will be designated as "Wilderness"					1						I	
S-0003-04	RV	TM									I really like hiking in the breaks and prairie along the Musselshell and Missouri Rivers. I love the big sky here, the extremes in weather and the feeling that this is what Montana was a couple hundred years ago. Please restrict motor vehicles to only those roads that are essential to access these areas. Close and reclaim any roads that are in excess of a basic transportation network.	1										I	
S-0003-05	AP	WC									I understand that there are citizen inventories of BLM lands in the planning area that could qualify for Wilderness Designation. Please incorporate these citizen inventories in your planning process.					1						I	
S-0003-06	TM	VC									You should do a complete inventory of noxious weed problems and then take effective steps to control the issue. Where off road vehicles have scarred the land and intensified the spread of weeds please put some effective controls on motor vehicles. Restrict motor vehicles to designated roads only. Please leave in place only the road network that provides basic transportation. The less roads you keep the wilder and more natural the landscape will be.	1										I	
S-0003-07	LR	ME	RV								Please try to keep industrial activity such as power lines gas and oil wells and pipelines concentrated on the edges of BLM lands, adjacent to existing roads. Leave wide open spaces for non-motorized recreation far from industrial development.	1										I	
S-0003-08	RV	SD	SR	TM	WC						I really like the Arrow Creek Breaks. Like the Terry Badlands in eastern Montana it is easy to get a feeling for how wild Montana once was just by hiking away from the road a short distance here. The ruggedly beautiful Arrow Creek Breaks are fragile and easily scarred. Please protect them from the abuses of motor vehicles.	1										I	
S-0003-09	LR										I hope you are able to consolidate BLM lands by pursuing land trades, acquisitions, and conservation easements.	1										I	
S-0003-10	AP	WC									Lastly I would encourage the BLM to do a complete inventory of all BLM parcels 5,000 acres or more to assess their wilderness values. Especially look for areas to provide naturalness, primitive non-motorized recreation, wildlife habitat and solitude.	1										I	
S-0003-11	AA	WC									And QUIET. In a noisy world quiet areas are getting harder to find. Please preserve what we have.			1								I	
S-0004-01	WC										Conduct a wilderness inventory on all BLM lands 5,000 acres or greater to assess naturalness, opportunities for solitude or primitive recreation, and supplemental values such as wildlife, historic and cultural sites, and geologic features, etc., in accordance with the with the most recent BLM wilderness guidelines.	1							DC-01			I	
S-0004-02	AP	WC									Incorporate citizen wilderness inventories in the planning process.	1							DC-02			I	
S-0004-03	FW	ME	SR	VC	WR						Identify areas and waterways with wildlife or wildland values that are not fulfilling their potential because of noxious weeds, past commercial activities or ground disturbances that could be restored.	1							DC-03			I	
S-0004-04	FW	SD	WC								Give special consideration to conserving land near existing wildlife refuges or protected areas, are in the Rocky Mountain Front Heritage Act, or provide critical wildlife habitat.	1							DC-04			I	
S-0004-05	SR	TM	VC								Identify sites with noxious weeds and where off-road vehicles have scarred the land or conflict with other users. Urge the BLM to take steps - even if only temporary - to keep those problems from getting worse.	1							DC-05			I	
S-0004-06	AC	LR									Identify opportunities to improve public access and consolidate public lands through conservation easements, land trades, and land acquisitions.	1							DC-06			I	
S-0004-07	LR	ME									Identify areas where industrial activities - oil and gas wells, transmission lines, pipelines, wind farms, communication towers, mines - will have the least impact and direct development there.	1							DC-07			I	
S-0004-08	SD	WC									Pay special attention to the following areas: the Musselshell Breaks near the C.M. Russell National Wildlife Refuge; the Arrow Creek Breaks; the Judith Mountains; prairie lands north of Winnett; and Blind Horse, Ear Mountain, Chute Mountain, and Deep Creek-Battle Creek on the Rocky Mountain Front.	1							DC-08			I	

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S-0005-01	WC										Conduct a wilderness inventory on all BLM lands 5,000 acres or greater to assess naturalness, opportunities for solitude or primitive recreation, and supplemental values such as wildlife, historic and cultural sites, and geologic features, etc., in accordance with the with the most recent BLM wilderness guidelines.	1						DC-01			I	FL-01	
S-0005-02	AP	WC									Incorporate citizen wilderness inventories in the planning process.	1						DC-02			I	FL-01	
S-0005-03	FW	ME	SR	VC	WR						Identify areas and waterways with wildlife or wildland values that are not fulfilling their potential because of noxious weeds, past commercial activities or ground disturbances that could be restored.	1						DC-03			I	FL-01	
S-0005-04	FW	SD	WC								Give special consideration to conserving land near existing wildlife refuges or protected areas, are in the Rocky Mountain Front Heritage Act, or provide critical wildlife habitat.	1						DC-04		Audubon IBAs, FWS Rocky Mountain Front Conservation Area, Montana State Wildlife Action Plan all identified in Wildlife section	I	FL-01	
S-0005-05	AC	LR									Identify opportunities to improve public access and consolidate public lands through conservation easements, land trades, and land acquisitions.	1						DC-06			I	FL-01	
S-0005-06	SR	TM	VC								Identify sites with noxious weeds and where off-road vehicles have scarred the land or conflict with other users. Urge the BLM to take steps - even if only temporary - to keep those problems from getting worse.	1						DC-05			I	FL-01	
S-0005-07	LR	ME									Identify areas where industrial activities - oil and gas wells, transmission lines, pipelines, wind farms, communication towers, mines - will have the least impact and direct development there.	1						DC-07			I	FL-01	
S-0006-01	WC										Conduct a wilderness inventory on all BLM lands 5,000 acres or greater to assess naturalness, opportunities for solitude or primitive recreation, and supplemental values such as wildlife, historic and cultural sites, and geologic features, etc., in accordance with the with the most recent BLM wilderness guidelines.	1						DC-01			I	FL-01	
S-0006-02	AP	WC									Incorporate citizen wilderness inventories in the planning process.	1						DC-02			I	FL-01	
S-0006-03	FW	ME	SR	VC	WR						Identify areas and waterways with wildlife or wildland values that are not fulfilling their potential because of noxious weeds, past commercial activities or ground disturbances that could be restored.	1						DC-03			I	FL-01	
S-0006-04	FW	SD	WC								Give special consideration to conserving land near existing wildlife refuges or protected areas, are in the Rocky Mountain Front Heritage Act, or provide critical wildlife habitat.	1						DC-04		See comment 29	I	FL-01	
S-0006-05	SR	TM	VC								Identify sites with noxious weeds and where off-road vehicles have scarred the land or conflict with other users. Urge the BLM to take steps - even if only temporary - to keep those problems from getting worse.	1						DC-05			I	FL-01	
S-0006-06	AC	LR									Identify opportunities to improve public access and consolidate public lands through conservation easements, land trades, and land acquisitions.	1						DC-06			I	FL-01	
S-0006-07	LR	ME									Identify areas where industrial activities - oil and gas wells, transmission lines, pipelines, wind farms, communication towers, mines - will have the least impact and direct development there.	1						DC-07			I	FL-01	
S-0007-01	VC	WC	WR								In general, I am strongly interested in and concerned about preserving the wildland characteristics of approximately 650,000 acres of public BLM wildlands in central Montana prairies as well as forestlands and especially riparian areas.	1									I		
S-0007-02	AA	LG	RV	TM	VC	WC					Having canoed the Missouri River numerous times since 1979, I am concerned about cottonwood regeneration, invasion of noxious weeds, loss of solitude and quiet, destruction of riparian habitat by motorized travel, (air, land and water) and livestock use.	1									I		
S-0007-03	FP	FW	ME	VC	TM						The new Resource Management Plan must protect resources first and BLM must be bold in barring uses that threaten native vegetation and critical wildlife habitat. Extractive uses such as mining, timber and grazing as well as motorized recreation must take second place when it coming to managing BLM lands in central MT.	1									I		
S-0008-01	LR	ME									By Act of Congress in December 2006, then-Senator Max Baucus' legislation signed by then-Pres. George W. Bush placed off-limits to any new oil and gas and mineral leasing and development all public lands (i.e. Lewis & Clark National Forest and BLM) along Montana's Rocky Mountain Front, including federal minerals on split-estate private surface lands within approximately six miles more-or-less east of the national forest boundary. A number one priority in your RMP should be to emphasize that this law is in effect and must be adhered to.									1	Refer to Public Law 109-432 Section 403(a)	I	
S-0008-02	SD	TM	WC								Most of the BLM lands which bound the Lewis & Clark National Forest along the Rocky Mountain Front are currently designated as 'Outstanding Natural Areas' because of their high-quality wilderness characteristics, cultural & heritage resources, wildlife habitat, and scenic value. Be sure to maintain all these areas as 'Outstanding Natural Areas' and keep the travel plan as is (i.e. for 'traditional' recreational travel for hiking & horseback riding, skiing & snowshoeing, and NO motorized recreational vehicle use).	1										I	
S-0008-03	SD										I am quite familiar with the BLM ONAs along the Front, and I believe they should be managed just about like you have been managing them in the recent past.	1										I	
S-0009-01	AC	LR	RV								Loss of hunting and other access to private farm and ranchland in Montana, as across the West, is becoming a critical problem. Wildlife habitat on private lands is being lost to an agricultural industry responding to booming new global markets. Energy development has demanded, and will continue to demand, tradeoffs from wildlife and public lands recreation. All of these factors increase the importance of the Lewistown RMP to every stakeholder in these public lands.					1		DC-09				I	FL-02
S-0009-02	SD	SE	TM	VC	WC						In order to support the future of public lands hunting and fishing, I ask that you adopt backcountry conservation areas within the Lewistown RMP to conserve sizeable tracts of lands that are generally intact and undeveloped, and that provide highly-functioning fish and wildlife habitat and dispersed hunting and fishing opportunities. When adopted, backcountry conservation areas should conserve intact and undeveloped BLM lands, prioritize management activities that restore habitats and control noxious weeds, sustain important public access to public lands, and maintain traditional uses of the land that are important to rural communities.	1							DC-10			I	FL-02

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	AC	LR	RV																			
S-0010-01	AC	LR	RV								Loss of hunting and other access to private farm and ranchland in Montana, as across the West, is becoming a critical problem. Wildlife habitat on private lands is being lost to an agricultural industry responding to booming new global markets. Energy development has demanded, and will continue to demand, tradeoffs from wildlife and public lands recreation. All of these factors increase the importance of the Lewistown RMP to every stakeholder in these public lands.					1		DC-09			I	FL-02
S-0010-02	SD	SE	TM	VC	WC						In order to support the future of public lands hunting and fishing, I ask that you adopt backcountry conservation areas within the Lewistown RMP to conserve sizeable tracts of lands that are generally intact and undeveloped, and that provide highly-functioning fish and wildlife habitat and dispersed hunting and fishing opportunities. When adopted, backcountry conservation areas should conserve intact and undeveloped BLM lands, prioritize management activities that restore habitats and control noxious weeds, sustain important public access to public lands, and maintain traditional uses of the land that are important to rural communities.	1						DC-10			I	FL-02
S-0011-01	AC	LR	RV								Loss of hunting and other access to private farm and ranchland in Montana, as across the West, is becoming a critical problem. Wildlife habitat on private lands is being lost to an agricultural industry responding to booming new global markets. Energy development has demanded, and will continue to demand, tradeoffs from wildlife and public lands recreation. All of these factors increase the importance of the Lewistown RMP to every stakeholder in these public lands.					1		DC-09			I	FL-02
S-0011-02	SD	SE	TM	VC	WC						In order to support the future of public lands hunting and fishing, I ask that you adopt backcountry conservation areas within the Lewistown RMP to conserve sizeable tracts of lands that are generally intact and undeveloped, and that provide highly-functioning fish and wildlife habitat and dispersed hunting and fishing opportunities. When adopted, backcountry conservation areas should conserve intact and undeveloped BLM lands, prioritize management activities that restore habitats and control noxious weeds, sustain important public access to public lands, and maintain traditional uses of the land that are important to rural communities.	1						DC-10			I	FL-02
S-0012-01	AC	LR	RV								Loss of hunting and other access to private farm and ranchland in Montana, as across the West, is becoming a critical problem. Wildlife habitat on private lands is being lost to an agricultural industry responding to booming new global markets. Energy development has demanded, and will continue to demand, tradeoffs from wildlife and public lands recreation. All of these factors increase the importance of the Lewistown RMP to every stakeholder in these public lands.					1		DC-09			I	FL-02
S-0012-02	SD	SE	TM	VC	WC						In order to support the future of public lands hunting and fishing, I ask that you adopt backcountry conservation areas within the Lewistown RMP to conserve sizeable tracts of lands that are generally intact and undeveloped, and that provide highly-functioning fish and wildlife habitat and dispersed hunting and fishing opportunities. When adopted, backcountry conservation areas should conserve intact and undeveloped BLM lands, prioritize management activities that restore habitats and control noxious weeds, sustain important public access to public lands, and maintain traditional uses of the land that are important to rural communities.	1						DC-10			I	FL-02
S-0013-01	AP										the public believes none of these lands are "open". they all have a purpose in mind being there for public, birds, trees and wildlife. THAT IS AN EXCELLENT USE FOR THEM. WE DONT NEED TO DESTROY THEM AS BLM SO OFTEN DOES.				1						I	
S-0013-02	AA	FM									STOP TH BURNING AND STOP THE CIRCULATION OF DISEASES THAT KILL FROM FINE PARTICULATE MATTER.				1						I	
S-0013-03	FW	WR									PROTECT THE WATER FOR THE BENEFIT OF ALL, NOT JUST FOR PROFITEERS. THE WILDIFE AND BIRDS ARE BEING DESTROYED BY BLM BRINGING IN POLLUTING INDUSTRIES AND THAT NEEDS TO TOTALLY STOP.				1					for Wildlife - unsupported opinion; will be addressed independent of RMP	I	
S-0013-04	LG										ISSUE ZERO GRAZING PERMITS TO ROBBER BARON CATTLE RANCHERS, WHO GET THESE CHEAP CHEAP GRAZING PERMITS AND THEN LEAVE THE LAND TOTALLY DESTROYED. CATTLE BRING ON GLOBAL WARMING AND IT IS TIME TO BAN ALL CATTLE ON THESE LANDS.	1									I	
S-0013-05	LG										THE ROBBER BARON CATTLE RANCDHERS ARE LEACHING ON EVERY CITIZEN IN AMERICA BY PAYING SUCH CHEAP RATES. THEY PAY LESS THAN 1/10 OF WHAT RENTING PRIVATE LAND COSTS. BLM NEEDS TO STOP LETTING US CITIZENS BE RIPPED OFF BY THESE LEACHING RANCHERS.				1						I	
S-0013-06	FP										BAN ALL LOGGINIG.	1									I	
S-0013-07	TM										BAN ALL NEW ROADS. CLOSE OFF SOME OLD ROADS.	1									I	
S-0013-08	SD										MAKE THE ENTIRE AREA WILDERNESS DESIGNATION.				1						I	
S-0014-01	AC	LR	RV								Loss of hunting and other access to private farm and ranchland in Montana, as across the West, is becoming a critical problem. Wildlife habitat on private lands is being lost to an agricultural industry responding to booming new global markets. Energy development has demanded, and will continue to demand, tradeoffs from wildlife and public lands recreation. All of these factors increase the importance of the Lewistown RMP to every stakeholder in these public lands.					1		DC-09			I	FL-02
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S-0015-01	AC	LR	RV								Loss of hunting and other access to private farm and ranchland in Montana, as across the West, is becoming a critical problem. Wildlife habitat on private lands is being lost to an agricultural industry responding to booming new global markets. Energy development has demanded, and will continue to demand, tradeoffs from wildlife and public lands recreation. All of these factors increase the importance of the Lewistown RMP to every stakeholder in these public lands.					1		DC-09			I	FL-02

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S-0020-01	AC	LR	RV								Loss of hunting and other access to private farm and ranchland in Montana, as across the West, is becoming a critical problem. Wildlife habitat on private lands is being lost to an agricultural industry responding to booming new global markets. Energy development has demanded, and will continue to demand, tradeoffs from wildlife and public lands recreation. All of these factors increase the importance of the Lewistown RMP to every stakeholder in these public lands.					1			DC-09			I	FL-02
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S-0021-01	AC	LR	RV								Loss of hunting and other access to private farm and ranchland in Montana, as across the West, is becoming a critical problem. Wildlife habitat on private lands is being lost to an agricultural industry responding to booming new global markets. Energy development has demanded, and will continue to demand, tradeoffs from wildlife and public lands recreation. All of these factors increase the importance of the Lewistown RMP to every stakeholder in these public lands.					1			DC-09			I	FL-02

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	SD	SE	TM	VC	WC																		
S-0021-02	SD	SE	TM	VC	WC						In order to support the future of public lands hunting and fishing, I ask that you adopt backcountry conservation areas within the Lewistown RMP to conserve sizeable tracts of lands that are generally intact and undeveloped, and that provide highly-functioning fish and wildlife habitat and dispersed hunting and fishing opportunities. When adopted, backcountry conservation areas should conserve intact and undeveloped BLM lands, prioritize management activities that restore habitats and control noxious weeds, sustain important public access to public lands, and maintain traditional uses of the land that are important to rural communities.	1						DC-10			I	FL-02	
S-0022-01	AC	LR	RV								Loss of hunting and other access to private farm and ranchland in Montana, as across the West, is becoming a critical problem. Wildlife habitat on private lands is being lost to an agricultural industry responding to booming new global markets. Energy development has demanded, and will continue to demand, tradeoffs from wildlife and public lands recreation. All of these factors increase the importance of the Lewistown RMP to every stakeholder in these public lands.					1			DC-09			I	FL-02
S-0022-02	SD	SE	TM	VC	WC						In order to support the future of public lands hunting and fishing, I ask that you adopt backcountry conservation areas within the Lewistown RMP to conserve sizeable tracts of lands that are generally intact and undeveloped, and that provide highly-functioning fish and wildlife habitat and dispersed hunting and fishing opportunities. When adopted, backcountry conservation areas should conserve intact and undeveloped BLM lands, prioritize management activities that restore habitats and control noxious weeds, sustain important public access to public lands, and maintain traditional uses of the land that are important to rural communities.	1							DC-10			I	FL-02
S-0023-01	AC	LR	RV								Loss of hunting and other access to private farm and ranchland in Montana, as across the West, is becoming a critical problem. Wildlife habitat on private lands is being lost to an agricultural industry responding to booming new global markets. Energy development has demanded, and will continue to demand, tradeoffs from wildlife and public lands recreation. All of these factors increase the importance of the Lewistown RMP to every stakeholder in these public lands.					1			DC-09			I	FL-02
S-0023-02	SD	SE	TM	VC	WC						In order to support the future of public lands hunting and fishing, I ask that you adopt backcountry conservation areas within the Lewistown RMP to conserve sizeable tracts of lands that are generally intact and undeveloped, and that provide highly-functioning fish and wildlife habitat and dispersed hunting and fishing opportunities. When adopted, backcountry conservation areas should conserve intact and undeveloped BLM lands, prioritize management activities that restore habitats and control noxious weeds, sustain important public access to public lands, and maintain traditional uses of the land that are important to rural communities.	1							DC-10			I	FL-02
S-0024-01	AC	LR	RV								Loss of hunting and other access to private farm and ranchland in Montana, as across the West, is becoming a critical problem. Wildlife habitat on private lands is being lost to an agricultural industry responding to booming new global markets. Energy development has demanded, and will continue to demand, tradeoffs from wildlife and public lands recreation. All of these factors increase the importance of the Lewistown RMP to every stakeholder in these public lands.					1			DC-09			I	FL-02
S-0024-02	SD	SE	TM	VC	WC						In order to support the future of public lands hunting and fishing, I ask that you adopt backcountry conservation areas within the Lewistown RMP to conserve sizeable tracts of lands that are generally intact and undeveloped, and that provide highly-functioning fish and wildlife habitat and dispersed hunting and fishing opportunities. When adopted, backcountry conservation areas should conserve intact and undeveloped BLM lands, prioritize management activities that restore habitats and control noxious weeds, sustain important public access to public lands, and maintain traditional uses of the land that are important to rural communities.	1							DC-10			I	FL-02
S-0025-01	AC	LR	RV								Loss of hunting and other access to private farm and ranchland in Montana, as across the West, is becoming a critical problem. Wildlife habitat on private lands is being lost to an agricultural industry responding to booming new global markets. Energy development has demanded, and will continue to demand, tradeoffs from wildlife and public lands recreation. All of these factors increase the importance of the Lewistown RMP to every stakeholder in these public lands.					1			DC-09			I	FL-02
S-0025-02	SD	SE	TM	VC	WC						In order to support the future of public lands hunting and fishing, I ask that you adopt backcountry conservation areas within the Lewistown RMP to conserve sizeable tracts of lands that are generally intact and undeveloped, and that provide highly-functioning fish and wildlife habitat and dispersed hunting and fishing opportunities. When adopted, backcountry conservation areas should conserve intact and undeveloped BLM lands, prioritize management activities that restore habitats and control noxious weeds, sustain important public access to public lands, and maintain traditional uses of the land that are important to rural communities.	1							DC-10			I	FL-02
S-0026-01	AC	LR	RV								Loss of hunting and other access to private farm and ranchland in Montana, as across the West, is becoming a critical problem. Wildlife habitat on private lands is being lost to an agricultural industry responding to booming new global markets. Energy development has demanded, and will continue to demand, tradeoffs from wildlife and public lands recreation. All of these factors increase the importance of the Lewistown RMP to every stakeholder in these public lands.					1			DC-09			I	FL-02
S-0026-02	SD	SE	TM	VC	WC						In order to support the future of public lands hunting and fishing, I ask that you adopt backcountry conservation areas within the Lewistown RMP to conserve sizeable tracts of lands that are generally intact and undeveloped, and that provide highly-functioning fish and wildlife habitat and dispersed hunting and fishing opportunities. When adopted, backcountry conservation areas should conserve intact and undeveloped BLM lands, prioritize management activities that restore habitats and control noxious weeds, sustain important public access to public lands, and maintain traditional uses of the land that are important to rural communities.	1							DC-10			I	FL-02
S-0027-01	AC	LR	RV								Loss of hunting and other access to private farm and ranchland in Montana, as across the West, is becoming a critical problem. Wildlife habitat on private lands is being lost to an agricultural industry responding to booming new global markets. Energy development has demanded, and will continue to demand, tradeoffs from wildlife and public lands recreation. All of these factors increase the importance of the Lewistown RMP to every stakeholder in these public lands.					1			DC-09			I	FL-02

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	SD	SE	TM	VC	WC																		
S-0027-02	SD	SE	TM	VC	WC						In order to support the future of public lands hunting and fishing, I ask that you adopt backcountry conservation areas within the Lewistown RMP to conserve sizeable tracts of lands that are generally intact and undeveloped, and that provide highly-functioning fish and wildlife habitat and dispersed hunting and fishing opportunities. When adopted, backcountry conservation areas should conserve intact and undeveloped BLM lands, prioritize management activities that restore habitats and control noxious weeds, sustain important public access to public lands, and maintain traditional uses of the land that are important to rural communities.	1						DC-10			I	FL-02	
S-0028-01	AC	LR	RV								Loss of hunting and other access to private farm and ranchland in Montana, as across the West, is becoming a critical problem. Wildlife habitat on private lands is being lost to an agricultural industry responding to booming new global markets. Energy development has demanded, and will continue to demand, tradeoffs from wildlife and public lands recreation. All of these factors increase the importance of the Lewistown RMP to every stakeholder in these public lands.					1			DC-09			I	FL-02
S-0028-02	SD	SE	TM	VC	WC						In order to support the future of public lands hunting and fishing, I ask that you adopt backcountry conservation areas within the Lewistown RMP to conserve sizeable tracts of lands that are generally intact and undeveloped, and that provide highly-functioning fish and wildlife habitat and dispersed hunting and fishing opportunities. When adopted, backcountry conservation areas should conserve intact and undeveloped BLM lands, prioritize management activities that restore habitats and control noxious weeds, sustain important public access to public lands, and maintain traditional uses of the land that are important to rural communities.	1							DC-10			I	FL-02
S-0029-01	AC	LR	RV								Loss of hunting and other access to private farm and ranchland in Montana, as across the West, is becoming a critical problem. Wildlife habitat on private lands is being lost to an agricultural industry responding to booming new global markets. Energy development has demanded, and will continue to demand, tradeoffs from wildlife and public lands recreation. All of these factors increase the importance of the Lewistown RMP to every stakeholder in these public lands.					1			DC-09			I	FL-02
S-0029-02	SD	SE	TM	VC	WC						In order to support the future of public lands hunting and fishing, I ask that you adopt backcountry conservation areas within the Lewistown RMP to conserve sizeable tracts of lands that are generally intact and undeveloped, and that provide highly-functioning fish and wildlife habitat and dispersed hunting and fishing opportunities. When adopted, backcountry conservation areas should conserve intact and undeveloped BLM lands, prioritize management activities that restore habitats and control noxious weeds, sustain important public access to public lands, and maintain traditional uses of the land that are important to rural communities.	1							DC-10			I	FL-02
S-0030-01	AC	LR	RV								Loss of hunting and other access to private farm and ranchland in Montana, as across the West, is becoming a critical problem. Wildlife habitat on private lands is being lost to an agricultural industry responding to booming new global markets. Energy development has demanded, and will continue to demand, tradeoffs from wildlife and public lands recreation. All of these factors increase the importance of the Lewistown RMP to every stakeholder in these public lands.					1			DC-09			I	FL-02
S-0030-02	SD	SE	TM	VC	WC						In order to support the future of public lands hunting and fishing, I ask that you adopt backcountry conservation areas within the Lewistown RMP to conserve sizeable tracts of lands that are generally intact and undeveloped, and that provide highly-functioning fish and wildlife habitat and dispersed hunting and fishing opportunities. When adopted, backcountry conservation areas should conserve intact and undeveloped BLM lands, prioritize management activities that restore habitats and control noxious weeds, sustain important public access to public lands, and maintain traditional uses of the land that are important to rural communities.	1							DC-10			I	FL-02
S-0031-01	AC	LR	RV								Loss of hunting and other access to private farm and ranchland in Montana, as across the West, is becoming a critical problem. Wildlife habitat on private lands is being lost to an agricultural industry responding to booming new global markets. Energy development has demanded, and will continue to demand, tradeoffs from wildlife and public lands recreation. All of these factors increase the importance of the Lewistown RMP to every stakeholder in these public lands.					1			DC-09			I	FL-02
S-0031-02	SD	SE	TM	VC	WC						In order to support the future of public lands hunting and fishing, I ask that you adopt backcountry conservation areas within the Lewistown RMP to conserve sizeable tracts of lands that are generally intact and undeveloped, and that provide highly-functioning fish and wildlife habitat and dispersed hunting and fishing opportunities. When adopted, backcountry conservation areas should conserve intact and undeveloped BLM lands, prioritize management activities that restore habitats and control noxious weeds, sustain important public access to public lands, and maintain traditional uses of the land that are important to rural communities.	1							DC-10			I	FL-02
S-0032-01	AC	LR	RV								Loss of hunting and other access to private farm and ranchland in Montana, as across the West, is becoming a critical problem. Wildlife habitat on private lands is being lost to an agricultural industry responding to booming new global markets. Energy development has demanded, and will continue to demand, tradeoffs from wildlife and public lands recreation. All of these factors increase the importance of the Lewistown RMP to every stakeholder in these public lands.					1			DC-09			I	FL-02
S-0032-02	SD	SE	TM	VC	WC						In order to support the future of public lands hunting and fishing, I ask that you adopt backcountry conservation areas within the Lewistown RMP to conserve sizeable tracts of lands that are generally intact and undeveloped, and that provide highly-functioning fish and wildlife habitat and dispersed hunting and fishing opportunities. When adopted, backcountry conservation areas should conserve intact and undeveloped BLM lands, prioritize management activities that restore habitats and control noxious weeds, sustain important public access to public lands, and maintain traditional uses of the land that are important to rural communities.	1							DC-10			I	FL-02
S-0033-01	AC	LR	RV								Loss of hunting and other access to private farm and ranchland in Montana, as across the West, is becoming a critical problem. Wildlife habitat on private lands is being lost to an agricultural industry responding to booming new global markets. Energy development has demanded, and will continue to demand, tradeoffs from wildlife and public lands recreation. All of these factors increase the importance of the Lewistown RMP to every stakeholder in these public lands.					1			DC-09			I	FL-02

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S-0034											PART 2 - Additional information sources, websites or references mentioned by the commentor in Comment #0034.								1	National Management Strategy for Motorized Off-Highway Vehicle Use http://www.blm.gov/ohv/OHV_FNL.pdf http://www.marketwire.com/press-release/The-Results-Are-in-Off-Road-Vehicle-Riding-is-Good-for-Your-Body-and-Soul-1310189.htm (http://www.greatfalltribune.com/article/20110824/NEWS01/108240302/National-road-trail-reme (http://en.wikipedia.org/wiki/Confirmation_bias Final National Management Strategy for Motorized Off-Highway Vehicle Use, January 19, 2001, http://www.blm.gov/ohv/ http://online.wsj.com/community/groups/question-day-229/topics/should-40-million-acres-land http://www.sepp.org/Archive/NewSEPP/LtrtoPaulMartin.html http://sciencepolicy.colorado.edu/admin/publication_files/resource-2803-2010.06.pdf http://www.climatewatch.org http://epw.senate.gov/speechitem.cfm?party=rep&id=263759 http://co2now.org/ http://www.drooyper.com/2010/01/december-2009-uah-global-temperature-update-0-28-degree-c/ http://www.telegraph.co.uk/comment/columnists/christopherbooker/5664069/Polarbear-expert-barred-by-global-warmists.html (http://www.fs.fed.us/recreation/programs/nvum/nvum_national_summary_fy2007.pdf, http://billingsgazette.net/articles/2008/12/04/features/outdoors/18-woods.txt	O	
S-0034											PART 3 - Additional information sources, websites or references mentioned by the commentor in Comment #0034.								1	http://www.trails.idaho.gov/ http://helenair.com/news/article_633fdef8-6a1c-11df-8dcf-001cc4c002e0.html?print=1 http://www.fs.fed.us/trailsunlimited/ http://www.stream.fs.fed.us http://www.fs.fed.us/t-d/programs/wsa/pdfPubs/road_bmp.pdf http://www.fs.fed.us/r1/bd/forest_plan/revision/reports_documents/social/Forest%20Social%20Assessment%20Masterfinal%20.pdf http://www.sharetrails.org/magazine.cfm?story=705 http://www.sltrib.com/utah/ci_4194188 http://www.kscourts.org/ca10/datefile/datefile.htm http://www.helenair.com/articles/2005/12/14/montana/a10121405_04.prt http://www.nps.gov/yell/parkmgmt/upload/winterrec05.pdf http://www.idahoparks.org/rec/ranger1.html http://www.fs.fed.us/r4/sawtooth/projects/ Executive Order 12898 http://www.helenair.com/articles/2006/11/07/montana/a07110706_02.prt	O	
S-0034											PART 4 - Additional information sources, websites or references mentioned by the commentor in Comment #0034.								1	P.L. 105-359 (Improving Access to Outdoor Recreational Activities on Federal Land, prepared by Wilderness Inquiry, June 27, 2000 Executive Order 11644 passed on February 8, 1972 Executive Order 11989 passed on May 24, 1977 https://scholarsbank.uoregon.edu/xmlui/bitstream/handle/1794/9849/GV_191.67_T7M66_1994.pdf?sequence=1	O	
S-0035-01	AC	LR	RV								Loss of hunting and other access to private farm and ranchland in Montana, as across the West, is becoming a critical problem. Wildlife habitat on private lands is being lost to an agricultural industry responding to booming new global markets. Energy development has demanded, and will continue to demand, tradeoffs from wildlife and public lands recreation. All of these factors increase the importance of the Lewistown RMP to every stakeholder in these public lands.								1		I	FL-02
S-0035-02	SD	SE	TM	VC	WC						In order to support the future of public lands hunting and fishing, I ask that you adopt backcountry conservation areas within the Lewistown RMP to conserve sizeable tracts of lands that are generally intact and undeveloped, and that provide highly-functioning fish and wildlife habitat and dispersed hunting and fishing opportunities. When adopted, backcountry conservation areas should conserve intact and undeveloped BLM lands, prioritize management activities that restore habitats and control noxious weeds, sustain important public access to public lands, and maintain traditional uses of the land that are important to rural communities.	1									I	FL-02

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	AC	AP	FW	LR	ME	SD	SR	VC	WC	WR														
S-0036-01	AC	AP	FW	LR	ME	SD	SR	VC	WC	WR		RECOMMENDATION: • Emphasize and conduct wilderness inventories on all BLM lands 5000 acres or greater to assess naturalness, opportunities for solitude, opportunities for primitive recreation, and supplemental values such as wildlife, historic and cultural sites, and geologic features in accordance with most recent BLM wilderness guidelines. This should include identification of areas and waterways with wildlife or wildland values that are not fulfilled to their true potential due to noxious weeds, past commercial activities, vandalism, or ground disturbances and that could be restored. Special attention should be given to lands near existing wildlife refuges or protected areas and critical wildlife habitat. Emphasis should be placed on expanding opportunities to improve public access and consolidate public lands through conservation easements, land trades, and land acquisitions. RATIONALE: • Wild lands, once lost, cannot be replaced. Without protection, critical wildlife corridors will be lost and native habitats will disappear. Future generations will only be able to see wildlife and wild habitat in books and videos - what a loss!!! • Our nation is dealing with growing obesity epidemic and mental health crisis. Wild places can bring relief to stressed life styles and become superb settings to exercise and build self confidence. We need to preserve these places where people can find healthy and natural recreation. • Access to undisturbed and primitive environments helps children and citizen scientists gain interest in and understanding of science, biology, geology, ecology, environment, natural history, and ancient civilizations.	1							DC-01, DC-02, DC-03, DC-04, DC-06			I	
S-0037-01	AC		LR	RV								Loss of hunting and other access to private farm and rangeland in Montana, as across the West, is becoming a critical problem. Wildlife habitat on private lands is being lost to an agricultural industry responding to booming new global markets. Energy development has demanded, and will continue to demand, tradeoffs from wildlife and public lands recreation. All of these factors increase the importance of the Lewistown RMP to every stakeholder in these public lands.					1		DC-09			I	FL-02	
S-0037-02		SD	SE	TM	VC	WC						In order to support the future of public lands hunting and fishing, I ask that you adopt backcountry conservation areas within the Lewistown RMP to conserve sizeable tracts of lands that are generally intact and undeveloped, and that provide highly-functioning fish and wildlife habitat and dispersed hunting and fishing opportunities. When adopted, backcountry conservation areas should conserve intact and undeveloped BLM lands, prioritize management activities that restore habitats and control noxious weeds, sustain important public access to public lands, and maintain traditional uses of the land that are important to rural communities.	1						DC-10			I	FL-02	
S-0038-01	AC		LR	RV								Loss of hunting and other access to private farm and rangeland in Montana, as across the West, is becoming a critical problem. Wildlife habitat on private lands is being lost to an agricultural industry responding to booming new global markets. Energy development has demanded, and will continue to demand, tradeoffs from wildlife and public lands recreation. All of these factors increase the importance of the Lewistown RMP to every stakeholder in these public lands.					1		DC-09			I	FL-02	
S-0038-02		SD	SE	TM	VC	WC						In order to support the future of public lands hunting and fishing, I ask that you adopt backcountry conservation areas within the Lewistown RMP to conserve sizeable tracts of lands that are generally intact and undeveloped, and that provide highly-functioning fish and wildlife habitat and dispersed hunting and fishing opportunities. When adopted, backcountry conservation areas should conserve intact and undeveloped BLM lands, prioritize management activities that restore habitats and control noxious weeds, sustain important public access to public lands, and maintain traditional uses of the land that are important to rural communities.	1						DC-10			I	FL-02	
S-0039-01												The Lewis and Clark National Historic Trail was established by Congress in an amendment to the National Trails System Act in 1978 [16 U.S.C. § 1244(a) (6)]. The NPS administers the Trail and is charged under this Act with the identification and protection of the historic route, remnants, and artifacts of the Lewis and Clark Expedition for public use and enjoyment. The NPS is pleased that BLM intends to coordinate with the Lewis and Clark National Historic Trail Administrator and other trail administrators in the planning area regarding the establishment of the National Trail Management Corridors. We greatly appreciate BLM recognizing and offering a role for National Trail administrators in BLM's planning for trail management and look forward to working together.								1	National Trails System Act in 1978 [16 U.S.C. § 1244(a) (6)]	F		
S-0040-01		ME										This RMP area includes the North Moccasin Mountains. These mountains contain a significant ore deposit of excellent quality magnetite (iron ore) plus other minerals such as galena (silver-lead-gold) ore. I ask that this RMP does not jeopardize the extraction of these minerals for the next generation and leave them vulnerable to importing their basic needs. These materials are imperative to the manufacture of all our electronic equipment.	1									B		
S-0041-01	AC		LR	RV								Loss of hunting and other access to private farm and rangeland in Montana, as across the West, is becoming a critical problem. Wildlife habitat on private lands is being lost to an agricultural industry responding to booming new global markets. Energy development has demanded, and will continue to demand, tradeoffs from wildlife and public lands recreation. All of these factors increase the importance of the Lewistown RMP to every stakeholder in these public lands.					1		DC-09			I	FL-02	
S-0041-02		SD	SE	TM	VC	WC						In order to support the future of public lands hunting and fishing, I ask that you adopt backcountry conservation areas within the Lewistown RMP to conserve sizeable tracts of lands that are generally intact and undeveloped, and that provide highly-functioning fish and wildlife habitat and dispersed hunting and fishing opportunities. When adopted, backcountry conservation areas should conserve intact and undeveloped BLM lands, prioritize management activities that restore habitats and control noxious weeds, sustain important public access to public lands, and maintain traditional uses of the land that are important to rural communities.	1						DC-10			I	FL-02	
S-0042-01		WC										1) Conduct a wilderness inventory on all BLM lands 5,000 acres or greater to assess naturalness, opportunities for solitude or primitive recreation, and supplemental values such as wildlife, historic and cultural sites, and geologic features etc. in accordance with the most recent BLM wilderness guidelines.	1						DC-01			I	FL-01	

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	FW	LR	ME	TM																				
S-0043-09	FW	LR	ME	TM							<p>Protections of all Greater Sagegrouse habitats</p> <p>2) Strong direction to avoid sagebrush fragmentation by additional roads or construction of overhead powerlines, wind farms, energy development or other uses contributing to fragmentation of sagebrush communities.</p>	1									O			
S-0043-10	FW	RV	SD	VC							<p>Identify and manage Backcountry Conservation Areas</p> <p>We ask that you identify areas of lands that are generally intact and undeveloped and that provide high quality fish and wildlife habitat. We ask that you allocate or designate these lands as "backcountry conservation areas" (BCAs) to conserve unfragmented fish and wildlife habitat and dispersed hunting and fishing opportunities. BHA is working with other hunting and fishing based organizations to identify specific intact and undeveloped lands within the BLM Lewistown District that are appropriate for BCA management, and we will follow up with supplemental recommendations that nominate specific areas as backcountry conservation areas. The following provides specific examples of the appropriate allocations or management approaches that should be applied in the Lewistown RMP when adopting BCAs.</p> <p>BCA Resource Decisions</p> <p>Fish and Wildlife Habitat and Noxious Weeds Establish objectives for management activities that conserve, restore, maintain and enhance fish and wildlife habitat, control and manage noxious weeds, and restore forests and rangelands.</p> <p>Recreation Opportunity Spectrum (ROS) The following ROS classes would be available within BCAs:</p> <ul style="list-style-type: none"> • Primitive; • Semi-Primitive Nonmotorized; • Semi-Primitive Motorized <p>Off-Highway Vehicles Designated as limited or closed. Existing routes would generally be retained, but travel would be limited to existing roads, primitive roads and trails.</p> <p>Fluid Minerals Lands would be open to new leasing subject to No Surface Occupancy (NSO) stipulations.</p> <p>Rights of Way BCAs would be exclusion areas for new linear rights-of-way.</p> <p>Renewable Energy Resources BCAs would be exclusion areas for renewable energy development, such as wind and solar.</p> <p>Grazing The BCA has no effect on authorized rangeland health, standards, capacity (animal unit months - AUMs) or livestock grazing management actions and tools (e.g. fencing and watering).</p> <p>Locatable Minerals BCA lands are generally not intended to be withdrawn from operation of the general mining laws. Reasonable efforts will be made to reduce and reclaim surface disturbances from exploration and mining activities and prevent the fragmentation of intact habitats within BCAs, while allowing for existing rights to be exercised.</p>	1					DC-11					O		
S-0044-01	AP	FW	LR	ME	VC						<p>While a portion of the federal minerals along the Front have been withdrawn by congressional action, some federal minerals were not subject to that withdrawal. Significant investment has been made by the US Fish and Wildlife Service, Montana Fish Wildlife and Parks, The Nature Conservancy, The Conservation Fund, other private land trusts, and numerous private landowners to protect lands on the Rocky Mountain Front for conservation purposes. More than 225,000 acres of private lands have been protected on the Front to date, through fee acquisitions or conservation easements. Some of these protected lands are underlain with federal minerals not subject to the congressional mineral withdrawal.</p> <p>These fee and conservation easement interests were acquired to protect the important biological values of these lands. These values include intact native plant grassland, wetland, riparian, and forest communities; habitat for numerous plant species of concern; and habitat for numerous wildlife species of concern such as grizzly bear, short-horned lizards, Sprague's pipit, and numerous other grassland, wetland, and forest bird species. These intact native communities and species of concern should be considered in the analysis of any leasing decisions or stipulations, and should receive special consideration and protective stipulations, especially on lands protected for conservation purposes</p> <p>Beyond the habitat values of any specific tract, intact habitats on these lands contribute to the larger scale habitat requirements and travel routes required for species with large home ranges, including grizzly bears and ungulates such as antelope, elk, and mule deer. Mineral development could significantly fragment existing large blocks of native habitats. Cumulative effects and impacts of mineral activities at these larger scales should be addressed in the RMP as well.</p>	1											O	
S-0044-02	ME	VC									<p>As a whole, the Rocky Mountain Front is largely free of noxious weeds. Weed management and prevention on the Front has been a priority for numerous private and public landowners, and other agencies for many years. The potential for the introduction or spread of invasive weeds as a result of mineral activities should also be considered in the RMP, and special stipulations should be developed to address invasive species.</p>	1											O	
S-0044-03	FW	ME	VC	WR	SD						<p>Of special note is The Nature Conservancy's Pine Butte Swamp Preserve, portions of which are underlain by federal minerals. Peat wetlands at Pine Butte support significant populations of 13 plant species of concern including Braya humilis, Gentianopsis macounii, Primula incana, Salix serissima, Carex craweii, Eleocharis rostellata, Juncus acuminatus, Kobresia simpliciuscula, Trichophorum cespitosum, Trichophorum pumilum, Cynidium stygium, Meesia triquetra, and Scorpidium scorpioides. These wetlands at Pine Butte are likely the largest peatland complex in Montana. These wetlands were recently recognized by the Montana Native Plant Society as part of its Important Plant Areas Program (http://www.mtnativeplants.org/Important%20Plant%20Areas). Maintenance and protection of surface and sub-surface hydrology in and around the wetlands is crucial for maintenance of the wetland complex. These wetlands also provide critical habitat for many wildlife species, most notably the security and feeding habitat for grizzly bears. Given these significant values we believe this area should receive the highest protections possible, preferably closure to leasing or at minimum no surface occupancy.</p>										http://www.mtnativeplants.org/Important%20Plant%20Areas	O		

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	CK	RV	TM																					
S-0046-04	CK	RV	TM													1				I				
S-0046-05	CK	PS	RV													1				I				
S-0046-06	CK	RV														1				I				
S-0046-07	CK	RV														1				I				
S-0046-08	CK	CR	ME	SR												1				I				
S-0046-09	CR	FW	ME	RV	SR											1				I				
S-0046-10	CK	RV	SE													1				I				
S-0047-01	ME	SR	WR									1								O				
S-0047-02	ME	WR										1										<p>Water Quality First, we are concerned about threats to water quality from oil and gas development. According to the BLM's factsheet on the revised hydraulic fracturing rule, "Approximately 90 percent of wells drilled on Federal and Indian lands use hydraulic fracturing, but BLM's current regulations governing hydraulic fracturing operations on public lands are more than 30 years old and were not written to address modern hydraulic fracturing activities" (Attachment 1), Although Montana has regulations that provide for minimal chemical disclosure, most of the chemicals used in oil and gas drilling are kept secret from the public. In addition to these rules, BLM recently released draft chemical disclosure and well stimulation rules¹. We believe that, even though these rules also do not go far enough to protect water quality, they have some good provisions, and the final RMP must include these draft rules.</p> <p>¹Interior Releases Updated Draft Rule for Hydraulic Fracturing on Public and Indian Lands for Public Comment," BLM, May 2013, http://www.blm.gov/wo/st/en/info/newsroom/2013/may/nr_05_16_2013.html.</p>	O	

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S-0047-10	ME										Royalties, Bonding & Reclamation From talking with landowners in the state, royalty rates on BLM leases are far behind market value. Royalty rates for the BLM for onshore minerals are 12.5% for a 10-year lease. Private and state leases range from 16.67% to 20%. The Government Accountability Office (GAO) did a report in 2008 that examined federal royalty and lease practices ⁷ . This report revealed that the BLM does not do as much as the states to encourage better return on development. Some recommendations that should be taken from this report include shorter lease terms, higher rental rates, higher royalty rates and graduated royalty rates depending on the potential for development.						1				⁷ "Oil and Gas Leasing: Interior Could Do More to Encourage Diligent Development," GAO report, October 2008. http://www.gao.gov/new.items/d0974.pdf .	O		
S-0047-11	AA	ME									Air Quality / Climate Oil and gas development is the second largest polluter (behind wildfires) when it comes to air quality. There are a few steps that the RMP can take to address this. One major impact from oil and gas in terms of air quality is the occurrence of flaring. In Montana, oil and gas wells can flare for an unlimited amount of time, if they produce less than 100,000 cubic feet of gas per day. This is extremely hazardous for the local air quality and contributes the larger threat of climate change. Although there is less development in the Field Office than in the Bakken where much of the flaring occurs, the RMP should still limit flaring and require green completion systems for all federal wells. Fortunately, according to a 2012 GAO report on natural gas emissions on federal lands, "data from EPA, supported by information obtained from technology vendors and GAO analysis, suggest that around 40 percent of natural gas estimated to be vented and flared on onshore federal leases could be economically captured with currently available control technologies." ⁸ There is no reason why the BLM could not institute these technologies as conditions on each lease or as an overall RMP policy due to the climate and air quality impacts.						1					⁸ "Federal Oil and Gas Leases: Opportunities Exist to Capture Vented and Flared Natural Gas, Which Would Increase Royalty Payments and Reduce Greenhouse Gases," GAO report, October 2012, http://www.gao.gov/assets/320/311826.pdf .	O	
S-0047-12	AA	AP	ME								In terms of climate change, the situation is dire even in a sparsely populated state such as Montana. According to the Billings Gazette, "carbon dioxide emissions rose by more than 11 percent in Montana last decade as the state continued to have one of the highest per capita greenhouse gas emission rates in the country." ⁹ This is directly a result of dirty energy development such as coal and oil and gas. The RMP should be a document that seeks to substantively address the increase of climate change emissions. A simple solution would be putting more of the BLM minerals off-limits to leasing or requiring emission capture systems as mentioned in the paragraph above. The BLM needs to use these RMPs to take action on this issue.	1											O	
S-0047-13	ME										Abuse of Waivers The RMP should not allow the changing of stipulations by application of waivers, exceptions, or modifications. The decision whether to grant waivers, exceptions, or modifications must occur during the Application for Permit to Drill approval process. The lack of public oversight of these waivers is alarming. The BLM should make sure that waivers are not used frequently and when they are used, a 30-day public comment period is always used. The way the public's mineral resources are managed should not be changed without public comment.						1					⁹ "Montana Greenhouse Gas Emissions Rose 11% Last Decade," Billings Gazette, May 14, 2013, http://billingsgazette.com/news/state-and-regional/montana/montana-greenhouse-gas-emissions-rose-last-decade/article_5fb4b015-7c73-55e5-bdd9-f05d090d94b8.html#ixzz2VHt8n32G .	O	
S-0047-14	ME										Potential Frack Sand Mining The Montana Bureau of Mines and Geology in conjunction with Montana Tech of the University of Montana are exploring a number of potential sites for frack sand mining. The BLM needs to be monitoring this proposed development and be ready to analyze any of the impacts associated with this mining. A section in the RMP about the potential for development should be included.	1										O		
S-0047-15	FW	ME									Wildlife Finally, we are also concerned about sage grouse interaction with oil and gas development. There are some areas of overlap between sage priority protection areas and no surface occupancy oil and gas leases. While the NSO stipulation is a good step forward in some ways, it is concerning that more of the area is not closed to leasing. This needs to be considered since even with a no surface occupancy restriction, well pads and the associated infrastructure (such as roads and pipelines) are still built nearby. From reviewing sage grouse studies, it is clear that setbacks (which is what no surface occupancy essentially is) are just one way to address the issue. According to Oil and Gas Development and Greater Sage Grouse (centrocercus urophasianus): A Review of Threats and Mitigation Measures, "The focus on set-back distances provides only a finite set of options for land managers and permittees alike. Because this approach does not take into account the specific causes of sage grouse avoidance, mortality, or potential population-level effects, it is of limited effectiveness to sage grouse conservation and management. A more comprehensive approach should incorporate performance standards that are based on an understanding of specific causes and effects of oil and gas infrastructure impacts on sage grouse (i.e., noise, predation, disease), as well as consideration of habitats other than leks (i.e., nesting, brood rearing, and winter habitats)." ¹⁰	1									¹⁰ "Oil and Gas Development and Greater Sage Grouse (Centrocercus urophasianus): A Review of Threats and Mitigation Measures," The Journal of Energy and Development, 2011, http://www.wildlifescienceintl.com/WSI_Inc/Published_Works_files/35-1%20Ramey.pdf	O		
S-0048-01	LR										My Primary Concern: (Trails and Travel Management)- To insure continued motor vehicle access for the benefit of the above-described private lands over and across adjoining public lands which are owned and administrated by the Bureau of Land Management. Obviously, I am opposed to any change in the Resource Management Plan which would impair or close my current access road. Currently I have the ability to use all manner of motor vehicles, including ATV's, upon the right-of- way, subject to the provisions of the use permit. I believe that the current rules and limitations governing my right-of-way/temporary use permit are adequate to protect the affected public lands.						1						I	

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	LG	LR	RV	WC																					
S-0048-02	LG	LR	RV	WC							My Secondary Concerns: (Wilderness Characteristics and Livestock Grazing) - I note that the Bureau of Land Management lands adjoining and within the immediate vicinity of my private land have been identified by the agency as having potential wildlife characteristics. Indeed, the area has exceptional wildlife. The burgeoning numbers of elk, mule deer, sharp-tailed grouse and turkeys - just to name a few species- are ample evidence of this. However, regardless of the abundance of wildlife in this area, any Resource Management Plan must also provide for other long-standing and beneficial multiple uses in this portion of Northeast Fergus County- primarily livestock grazing, hunting and recreational access.	1									(LWC)	I			
S-0048-03	AP										In short - the current Resource Management Plan covering my specific area of Northeast Fergus County is working well. Don't fix it! With respect to developing and adopting an updated management plan for any specific area, I urge the agency to consider, first and foremost, the guiding principle of multiple use and sustained yield.	1										I			
S-0048-04	AP										As you proceed in this planning process, please remember that there is no harm in maintaining the status-quo in a particular area if the current management plan has proven to be successful and beneficial to the various public and private interests.	1										I			
S-0049-01	AA	ME									Air Quality Analyses and Mitigation/or Federal Oil and Gas Decisions through NEPA We recommend that the RMP/EIS consider and disclose the potential environmental effects of oil and gas development in the planning area and determine whether there is a need to revise standards and guidelines (including leasing stipulations) to minimize the potential impact of oil and gas development. We understand that since this will be a programmatic analysis, site specific projects are not being considered or approved.	1											F		
S-0049-02	AA	AP									The EPA, U.S. Department of Agriculture and U.S. Department of Interior entered into a "Memorandum of Understanding (MOU) Regarding Air Quality Analyses and Mitigation for Federal Oil and Gas Decisions through the National Environmental Policy Act Process" on June 11, 2011. We believe using this helpful tool will ensure effective and efficient NEPA air quality evaluations.	1								EPA, U.S. Department of Agriculture and U.S. Department of Interior Memorandum of Understanding dated June 11, 2011, regarding Air Quality Analyses and Mitigation for Federal Oil and Gas Decisions through the National Environmental Policy Act Process	F				
S-0049-03	AA										The EPA recommends that the RMP/EIS disclose the current air quality conditions in the planning area, as well as potential air quality impacts associated with future activities contemplated in the planning area. More specifically, the EPA recommends that the Draft RMP/EIS include an evaluation of the direct, indirect, and cumulative impacts from potential RMP activities on the following: • Each of the criteria pollutants and their appropriate NAAQS, i.e., ozone, particulate matter, carbon monoxide, nitrogen oxides, sulfur dioxide and lead; • AQRVs in potentially impacted Class I areas and sensitive Class II areas; • Prevention of Significant Deterioration increment at potentially impacted Class I and sensitive Class II Areas; and • Projected ambient concentrations of hazardous air pollutants including Acetaldehyde, Benzene, Ethyl benzene, Ethylene glycol, Formaldehyde, Methanol, n-Hexane, Toluene, Xylene (mixture), and any other compounds that the BLM identifies as potential hazardous air pollutants in the planning area.													F	
S-0049-04	AA	AP									The EPA recommends that the BLM identify mitigation measures (including control measures and design features) it would apply at the project level in the event that potential adverse impacts to air quality or AQRVs on affected lands are predicted. These could include emission standards or limitations, best management practices (BMPs), dust suppression measures for unpaved roads and construction areas, incorporation of the Interagency Prescribed Fire Planning and Implementation Procedures Guide (July 2008) into site-specific prescribed bum plans, control technologies, and limitations on the pace of development. The EPA also recommends that the BLM identify the regulatory mechanisms it will use to ensure their implementation (including lease stipulations, conditions of approval, and notices to lessees).											Interagency Prescribed Fire Planning and Implementation Procedures Guide (July 2008)	F		
S-0049-05	ME	WR									Groundwater Resource Characterization It is important to characterize both the existing and potential groundwater drinking water resources in the planning area. We recommend the RMP/EIS include the following information: • A description of all aquifers in the study area, noting which aquifers are Underground Sources of Drinking Water (USDW s). Federal Safe Drinking Water Act regulations define a USDW as an aquifer or portion thereof: (a)(1) which supplies any public water system ; or (2) which contains a sufficient quantity of ground water to supply a public water system; and (i) currently supplies drinking water for human consumption; or (ii) contain s fewer than 10,000 mg/1total dissolved solids; and (b) which is not an exempted aquifer (See 40 CFR Section 144.3); • Available water quality and water yield information for each aquifer; • Maps depicting the location of sensitive groundwater resources such as municipal watersheds, source water protection zones (available from the Montana Department of Environmental Quality-MDEQ, Joe Meek -see contact information below in comment #5), sensitive aquifers, and recharge areas; • Descriptions and locations of groundwater use (e.g., public water supply wells, domestic wells, springs, and agricultural and stock wells. Also see comment #5 below; and • A map and discussion of proposed wells, existing producing wells, and nonproducing wells in the area including their status (e.g., idle, shut-in, plugged and abandoned), if available. Please refer to the Montana Board of Oil and Gas Conservation for location and abandonment information.												40 CFR Section 144.3	F	

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S-0049-06	ME	WR									The EPA recommends that the RMP/EIS analyze potential impacts to groundwater quality and quantity related to resource extraction such as mining and oil and gas production. Potential impacts include those associated with the following: leaks and spills; production and disposal of produced water or processing waters; use of pits, underground injection control (UIC) wells, tailing ponds, infiltration basins and evaporation ponds; production wellbore integrity; closure requirements; pipeline use; and impacts associated with restimulation and abandonment of existing wells. The EPA also recommends that the RMP/EIS discuss measures the BLM will require at the project level to minimize the potential for these impacts to occur and how the operations will be monitored to determine if the mitigation measures are effective.			1							F		
S-0049-07	ME	WR									Specifically, the EPA recommends that the BLM analyze and disclose potential groundwater protection, monitoring and mitigation measures, including: <ul style="list-style-type: none"> • BMPs and measures such as water reuse, closed loop drilling, lining of evaporation ponds, monitoring of water quality and water levels, closure and monitoring of tailings ponds, reserve pits and evaporation ponds; • Setback stipulations, such as No Surface Occupancy (NSO), to minimize the potential for impacts to potential drinking water resources, including domestic water wells and public water supply wells. Setbacks are effective health and environmental protection tools because they provide an opportunity for released contaminants to attenuate before reaching a water supply well. They may also afford an opportunity for a release to be remediated before it can impact a well, or for an alternate water supply to be secured. For these reasons, we recommend that the BLM require a minimum 500 foot NSO setback from private wells. We note that a number of states including Colorado and North Dakota have adopted a 500 foot setback from occupied dwellings (and by default, the associated domestic well). The EPA also encourages the BLM to consider sourcewater protection zones delineated by the MDEQ when evaluating the basis and need for setbacks from public water supply wells (see comment #5 below) ; 			1								F	
S-0049-08	ME	WR									<ul style="list-style-type: none"> • A mitigation plan for remediating future unanticipated impacts to drinking water wells, such as requiring the operator to remedy those impacts through treatment, replacement, or other appropriate means; • Abandonment procedures for sealing wells no longer in use in order to reduce the potential for inactive wells to serve as conduits for fluid movement between production zone(s) and aquifer(s). This is particularly important where existing wells do not have surface casing set into the base of USDWs and lack sufficient production casing cement. 				1							F	
S-0049-09	ME	WR									<ul style="list-style-type: none"> • A map of water bodies within and/or downstream of the planning area that includes perennial, intermittent and ephemeral water bodies; water body segments classified by the MDEQ as water quality impaired or threatened under the Clean Water Act (CWA) Section 303(d); water bodies considered not impaired by MDEQ, and water bodies that have not yet been assessed by the MDEQ for impairment status. We also recommend that a table be provided to identify the designated uses of the water bodies and the specific pollutants of concern, where applicable; • A map of municipal watersheds and designated source water protection zones; and • Maps and descriptions of topography and soils, specifically steep slopes and fragile or erodible soils, especially near surface waters and intermittent/ephemeral channels. 			1					Onshore Order 2		F		
S-0049-10	WR										Surface Water Resource Characterization The EPA recommends the RMP/EIS describe the current water quality conditions for surface water bodies within the planning area, including intermittent, perennial, and ephemeral streams, rivers, lakes, reservoirs, and surface water drinking water sources. We recommend comparing existing conditions to existing water quality standards or other reference conditions and presenting associated water quality status and trends.			1							F		
S-0049-11	SR	WR									<ul style="list-style-type: none"> • A map of water bodies within and/or downstream of the planning area that includes perennial, intermittent and ephemeral water bodies; water body segments classified by the MDEQ as water quality impaired or threatened under the Clean Water Act (CWA) Section 303(d); water bodies considered not impaired by MDEQ, and water bodies that have not yet been assessed by the MDEQ for impairment status. We also recommend that a table be provided to identify the designated uses of the water bodies and the specific pollutants of concern, where applicable; • A map of municipal watersheds and designated source water protection zones; and • Maps and descriptions of topography and soils, specifically steep slopes and fragile or erodible soils, especially near surface waters and intermittent/ephemeral channels. 			1					Clean Water Act (CWA) Section 303(d)		F		
S-0049-12	SR	WR									Surface Water Impacts We recommend that the RMP/EIS analyze potential impacts to surface waters related to erosion and sedimentation from land disturbance and stream crossings, as well as potential impacts associated with oil and gas well development, including drilling and production and potential spills and leaks from pits, evaporation ponds, and pipelines. We also recommend analyzing potential impacts to impaired water bodies within and/or downstream of the planning area, including water bodies listed on the most recent EPA-approved CWA § 303(d) list. Where TMDL analyses for impaired water bodies within, or downstream of, the planning area still need to be developed, we recommend that proposed activities in the drainages of CWA impaired or threatened water bodies be either carefully limited to prevent any worsening of the impairment or avoided where such impacts cannot be prevented.			1					CWA § 303(d) list		F		
S-0049-13	SR	WR									To fully disclose and, if necessary, mitigate the potential impacts of soil disturbance, we recommend that the RMP/EIS include an estimate of erosion rates and resulting impacts to water quality for each alternative. Erosion rates were calculated using the Water Erosion Prediction Project model (WEPP), a web-based interface developed by the U.S. Department of Agriculture, Agricultural Research Service, which can be accessed at http://www.ars.usda.gov/Research/ docs.htm?docid = 18084&pf=l . We recommend that the BLM consider using this model or another appropriate model that would be applicable to this planning area.			1					Water Erosion Prediction Project model (WEPP), a web-based interface at http://www.ars.usda.gov/Research/ docs.htm?docid = 18084&pf=l		F		

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	CR	FW	LR	RV	SD	TM														
S-0050-02	CR	FW	LR	RV	SD	TM		Collar Gulch should be opened back up for vehicular public access by opening the gate. The difficult decent and poor road in itself will limit the type and amount of traffic. It seems that the fish have been well protected and after 20 years of the access being closed it should once again be available to members of the public who are not capable of hiking in by way of the Camp Maiden road or the Collar Gulch Trail system. The gulch was a favorite place for many people for many years. The old Collar Mill stone foundation and dam farther up the creek are significant historical sites. And, it's always thrilling to view the fish. Thought should also be given to possibly lifting or reducing the size of the Collar Gulch ACEC designation. Is it still necessary? The BLM should survey and mark the boundary between public lands and private property in Collar Gulch. A sizable portion of Collar Creek is within the boundary's of the Hendricks and Edwards patented mining claims. The BLM should inquire with the property owners to determine if they would be interested a land swap or sale. As one of those owners, I would consider it.	1									I		
S-0050-03	CR	FP	VC					A historic landmark is located near the mouth of Maiden Canyon. This is a large limestone outcrop that resembles an elephants head and trunk and is know as "the Elephants Head" dating back many years. This unique feature can barely be seen now because of tree growth. Enough trees could be removed to one again expose the Elephants Head for the public's enjoyment. Possibly the trees could be designated/marked and then harvested by fire wood gathers.						1				I		
S-0050-04	FM	FP	PS	VC				The Maiden Forestry project took off a number of years ago under the experienced leadership of BLM Forester, Bruce Reed. The quality of work that was done on the slopes of Maiden Peak and around Camp Maiden was very good and certainly reduced wildfire fuel loads. The project fell dormant due to the necessary remediation of the Lime Kiln Canyon blow-down event. The Maiden Forestry project should be rejuvenated and move forward both for wildfire fuel reduction, public safety in the event of a wildfire, and good forestry stewardship. I was involved with the project and would lend my assistance again. Spotted Knapp weed flourishes in places along the Judith Peak Road and on Big Grassy Peak. Can this be better addressed in the future?						1				I		
S-0051-01	FM	FW	LG	SE	VC			Vegetation Management • Manage conifer encroachment to improve range biodiversity and help control wild fire. • Sage brush management is needed at times when it becomes a monoculture and crowds out native range biodiversity. • Manage vegetation with continued livestock grazing which improves habitat for sage grouse, reduces fire fuel load, and keeps viable ranches in operation. Viable ranches keep open space available for wildlife, and provide a stable economic base in small communities. • Use available scientific and local monitoring data along with "on the ground" common sense information when making decisions on riparian health, landscapes, and resources.	1										B	
S-0051-02	VC							Noxious Weeds and Invasive Species Management • Work diligently with permittees to not only identify and map invasive species, but get on the ground with control efforts using BMP's and whatever works for each individual situation. • Get more awareness and help from the public sector. With more traffic, hunting, general sight seeing, etc, they need to contribute to the weed issues with possibly vehicle washing and becoming informed and knowledgeable of how weeds are spread and what to look for.	1										B	
S-0051-03	FW							Fish and Wildlife Habitat • As in all management decisions, the LFO must be careful not to begin managing one habitat to the detriment of another or the detriment of other uses.	1								Both 291 and 292 are vague and Alternatives and effects analysis will show tradeoffs b/w resources	B		
S-0051-04	FW							Special Status Species • As in all management decisions, the LFO must be careful not to begin managing one habitat to the detriment of another or the detriment of other uses.	1									B		
S-0051-05	RV							Recreation and Visitor Services • Agree with both the Planning Questions and Planning Considerations at this time.				1						B		
S-0051-06	TM							Travel Management and Access • Keep existing roads and access used by permittees for operation maintenance.	1									B		
S-0051-07	LG	FW	VC					Forest Management • Manage conifer encroachment in some areas to preserve open habitat and native range diversity for both livestock grazing and wildlife. • Work in conjunction with other landowners and agencies for desired management.	1									B		
S-0051-08	FM							Wildland Urban Interface • Agree with Planning Questions and Planning Considerations at this time.				1						B		
S-0051-09	FM	VC						Fire Management • Consider whether prescribed burns have been successful. An example would be in the Tin Can Hill area. Was enough accomplished for the money spent?				1						B		
S-0051-10	FM	FW	LG	SE	VC			Livestock Grazing • Maintain livestock stocking rates to benefit viable ranching operations, local economy, wildlife, and fire management.	1									B		
S-0051-11	FM	FW	LG	SE	VC			Livestock Grazing • Work with permittees to eliminate or control crested wheat grass in areas where native range grasses would better benefit livestock and wildlife. • Consider working with permittees to add watering facilities that could possibly eliminate the need for stock ponds which sometimes sour the ground below them. • Work with permittees to add flexibility to grazing plans which could add diversity and management options benefiting both the operation and the resource.						1				B		
S-0051-12	LR	SE						Land Tenure Adjustment • Work with permittees with any land exchanges, sales, or trades. • No net gain of land ownership by the BLM in Petroleum County • Consider the influence of any changes of ownership on local economy and customs.	1									B		
S-0051-13	LR							Delineation of Right-of-Way Corridors and Sites • Agree with Planning Questions and Planning Considerations at this time.				1						B		

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	ME	SD	SE	VC	FM	FW	LR	RV	TM	VC																	
S-0051-14	ME										Mineral and Energy Development • Agree with Planning Questions and Planning Considerations at this time				1						B						
S-0051-15	SD										Special Designations • Small designations might be acceptable with local input.				1							B					
S-0051-16	SE										Management Concerns: Social and Economic Sustainability of Local Communities • This should be a big consideration in this RMP. Petroleum County is made up of a large percentage of BLM lands with agriculture being the main economic contributor. Thus any change in BLM management can have a huge impact on County economics and infrastructure. • Give credence to local elected officials, residents, business owners, landowners, and local customs and cultures.	1										B					
S-0052-01	VC										Issue: Noxious Weeds and Invasive Species Management A more comprehensive partnership approach to combating noxious weeds is necessary. Working with county weed districts and other state and federal agencies to bring a unified effort will be more productive. Consideration of check points and washing stations for recreation vehicles might help to stop the spread of weeds from outside areas.	1										B					
S-0052-02	FM	FW	LR	RV	SD	TM	VC				Issue: Recreation and Visitor Services Prior to designating SRMAs and ERMAs that contain adjoining private land, the private landowner should be consulted. An agreement should be developed that describes the roles and responsibilities for management of the area - these should include responsibility for trash cleanup, the spread of noxious weeds, the degradation of vegetation, and the maintenance of roadways because of the area being used for recreation. As co-owner of the Vogel Dam, the Brady Ranch is concerned about the problems created by the reservoir being a public recreation site. The Ranch was not consulted prior to the area becoming a designated recreation area and has not been consulted about the stocking of fish that has been taking place. Specific problems resulting from high public visitation are driving on the spillway and dam fill - which, according to the BLM engineer, will eventually result in the failure of these structures - blocking access across the dam to the private property, vandalism and ignoring of signage placed by the property owners, driving off roadways, leaving trash, spreading weeds, fire danger, etc. These problems are as detrimental to the BLM managed property as the private property. These issues need to be addressed or the fish stocking of the Vogel Reservoir will end.									1			B				
S-0052-03			RV	TM	VC						Issue: Travel Management and Access As a private property owner and a BLM grazing permittee, the use of 2-track trails and any semblance of a trail by OHV users is concerning. Many OHV users drive on anything that resembles a trail and the result is damage to vegetation and it also leads to trespass onto private property.									1			B				
S-0052-04			LR								Issue: Land Tenure Adjustments There should be no net gain of public land. Exchanges, purchases, and donations to create a more efficient public land system is very encouraged. The end result, however, should not be an increase of public land.											B					
S-0052-05			ME								Issue: Minerals and Energy Development Energy independence is important and leasing of federal minerals should be allowed.				1							B					
S-0053-01			FW	VC							As one of MFWP's area wildlife biologists within the area covered by the Lewistown RMP, one of the issues that I feel needs to be addressed in the RMP is dealing with conifer/juniper encroachment or invasion into areas of big sagebrush habitat, particularly in areas of occupied or potential sage grouse habitat.	1										ST					
S-0053-02			AC	LR							Another issue that I would like to see addressed is related to the disposition and management of the many small scattered parcels of BLM land in places such as Meagher County. Many, if not most of, these parcels have no public access, as they are surrounded by private land. In addition, these parcels are usually not managed separately from the surrounding private property. I would like to see the BLM through disposals, acquisitions, and land exchanges work to block up areas of BLM land or public land in general, i.e. block up BLM land with adjacent USFS land or state DNRC land that is public accessible, to improve public access.	1											ST				
S-0054-01			AP	FW	TM						We recommend the adoption of the following measures, which are proposed for adoption in the Preferred Alternative of other BLM plan revisions or sage grouse amendments. Some of these are similar to the provisions of Alternatives B and/or C. Limit OHV use to designated roads and trails; limit to existing roads and trails pending designation in the context of a 5-year travel planning effort (North Dakota RMP Amendment, Bighorn Basin RMP Revision).	1								North Dakota RMP Amendment, Bighorn Basin RMP Revision	O						
S-0054-02			FW	TM							Conduct restoration of roads not designated under travel planning (NW Colorado RMP Amendment).									1		NW Colorado RMP Amendment	O				
S-0054-03			FW	TM							Use existing roads, or realignments as described above to access valid existing rights that are not yet developed. If valid existing rights cannot be accessed via existing roads, then build any new road constructed to the absolute minimum standard necessary. Allow no upgrading of existing routes that would change route category (road, primitive road, or trail) or capacity unless the upgrading would have minimal impact on sage-grouse habitat, is necessary for motorist safety, or eliminates the need to construct a new road. (North Dakota RMP Amendment).												1	North Dakota RMP Amendmen	O		
S-0054-04			FW	TM							New road construction would be limited to realignments of existing roads, if that realignment has a minimal impact on greater sage-grouse habitat, eliminates the need to construct a new road, or is necessary for public safety. Incorporate BMPs. Existing roads used to access valid existing rights; if unavailable, construct to minimum standard necessary. (HiLine RMP revision, North Dakota RMP Amendment).	1												1	HiLine RMP revision; North Dakota RMP Amendment	O	
S-0054-05			FW	LR							Prohibit or bury powerlines within 0.6 miles of leks unless no SG declines can be demonstrated. Prohibit overhead transmission except within 0.5 mile of existing lines, corridor a maximum of 1 mile wide. Bury lines where possible. (Buffalo RMP revision).	1												1	Buffalo RMP revision	O	

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S-0054-06	FW	LR									High-profile structures exceeding 10 feet in height, would be eliminated, designed or sited in a manner which does not impact sage grouse. Permanent (longer than 2 months) structures which create movement must be designed or sited to minimize impacts to sage grouse. (North Dakota RMP Amendment).	1								North Dakota RMP Amendment	O		
S-0054-07	FW	LR									Priority Habitat would be a priority in consideration of land acquisitions. Retain public ownership of PH. Consider exceptions where: There is mixed ownership, and land exchanges would allow for additional or more contiguous federal ownership patterns within the priority sage-grouse habitat area; Under priority sage-grouse habitat areas with minority federal ownership, include an additional, effective mitigation agreement for any disposal of federal land. As a final preservation measure consideration would be given to pursuing a permanent conservation easement. (North Dakota Plan Amendments).	1								North Dakota Plan Amendments	O		
S-0054-08	FW	ME									No Surface Occupancy stipulations required for any new fluid minerals leasing, with no option for exceptions or modifications. (California-Nevada RMP Amendment).	1								California-Nevada RMP Amendment	O		
S-0054-09	FW	ME									Allow only heliportable geophysical exploration, with timing limitations applied. (North Dakota RMP Amendment, Bighorn Basin RMP Revision).	1		1						North Dakota RMP Amendment; Bighorn Basin RMP Revision	O		
S-0054-10	FW										Apply Timing Limitation Stipulations to all Priority Habitat. (South Dakota RMP Amendment).	1								South Dakota RMP Amendment	O		
S-0054-11	FP	FW	GR	LR	ME	TM					Timing Limitations should apply to surface disturbing and disruptive activities. (Lander RMP revision).	1							Lander RMP revision	O			
S-0054-12	FW	ME									Find Priority Habitats unsuitable for coal leasing. (North Dakota RMP Amendment, HiLine RMP Revision, Northwest Colorado RMP Amendment).	1								North Dakota RMP Amendment; HiLine RMP Revision; Northwest Colorado RMP Amendment	O		
S-0054-13	FW	ME									Close Priority Habitats to energy and non-energy leasable minerals leasing. (HiLine RMP revision, California-Nevada RMP Amendment).	1								HiLine RMP revision; California-Nevada RMP Amendment	O		
S-0054-14	FW	ME									Close Priority Habitats to salable minerals development. (North Dakota RMP Amendment, Nevada – Northeast California RMP Amendment)	1								North Dakota RMP Amendment; Nevada – Northeast California RMP Amendment	O		
S-0054-15	FW	LR									Priority Habitats are exclusion areas for new renewable energy ROW permitting. (North Dakota, California-Nevada, and Idaho-Southwest Montana RMP Amendments; HiLine, Buffalo, and South Dakota RMP revisions).	1								North Dakota, California-Nevada, and Idaho-Southwest Montana RMP Amendments; HiLine, Buffalo, and South Dakota RMP revisions	O		
S-0054-16	FW	LG									Maximum 25% forage utilization for livestock grazing in each grazing allotment. (North Dakota RMP Amendment).	1					1			North Dakota RMP Amendment	O		
S-0054-17	FW	LG	VC								Employ herd management to minimize livestock impacts on sage grouse nesting habitat during spring. Hot season grazing does not occur on an annual basis. Adjust AUMs where sage grouse habitat objectives are not being met. Incorporate terms and conditions into grazing permits to meet sage grouse habitat objectives. (California-Nevada RMP Amendment).	1								California-Nevada RMP Amendment	O		
S-0054-18	FW	LG	VC								Incorporate sage grouse habitat objectives into permit renewals. Manage toward ecological site potential and toward reference state to achieve sage grouse objectives. (NW Colorado RMP Amendment).	1								NW Colorado RMP Amendment	O		
S-0054-19	FW	LG									Design any new structural range improvements and location of supplements to conserve, enhance, or restore SG habitat through an improved grazing management system relative to SG objectives. Evaluate existing range improvements and location of supplements during AMP renewal process to make sure they conserve, enhance or restore SG habitat. (North Dakota RMP Amendment).	1								North Dakota RMP Amendment	O		
S-0054-20	FW	LG	WR								Analyze springs, seeps, and pipelines to see if modifications are needed. (NW Colorado RMP Amendment).	1								NW Colorado RMP Amendment	O		
S-0054-21	FW	LG	VC								Grazing allotments not meeting rangeland health standards and not making progress toward this goal will be closed. (Miles City RMP revision).	1								Miles City RMP revision	O		
S-0054-22	FW	LG	VC								Develop specific objectives to conserve, enhance or restore PH based on ESDs and assessments. Implement management actions (grazing decisions, AMP/Conservation Plan development, or other plans or agreements) to modify grazing management to meet seasonal sage-grouse habitat requirements. (North Dakota RMP Amendment).	1								North Dakota RMP Amendment	O		
S-0054-23	FW	VC									Where riparian and wetland areas are already meeting standards they would be maintained in that condition or better. Where a site's capability is less than PFC, BLM would manage to achieve or move toward capability. Manage wet meadows to maintain a component of perennial forbs with diverse species richness relative to site potential (e.g., reference state) to facilitate brood rearing. Where riparian areas and wet meadows meet PFC, strive to move towards GRSG habitat objectives within capabilities of the reference state vegetation relative to the ESD. (North Dakota RMP Amendment).	1									North Dakota RMP Amendment	O	
S-0054-24	FW	VC									Do not allow vegetation treatments with a potential to adversely affect sage grouse. Retain a minimum of 70% of ecological sites capable of supporting 12% cover in Wyoming big sage or 15% cover in mountain big sage. Manage a total disturbance cap of less than 30% lands not meeting these criteria. (NW Colorado RMP Amendment).	1								NW Colorado RMP Amendment	O		
S-0054-25	FW	VC									Evaluate role of existing seedings composed of introduced perennial grasses in and adjacent to Priority Habitat to determine if they should be restored to sagebrush or habitat of higher quality for sage grouse. If these seedings are part of an AMP/ Conservation Plan or if they provide value in conserving or enhancing the rest of the Priority Habitat, then no restoration would be necessary. (North Dakota RMP Amendment).	1								North Dakota RMP Amendment	O		
S-0054-26	FM	FW	VC								Do not use fire in precipitation zones < 12", except as last resort and where conditions allow and cheatgrass is a very minor component. (NW Colorado RMP Amendment).	1								NW Colorado RMP Amendment	O		
S-0054-27	FM	FW	LG	VC							Rest grazing allotments 3 full years following fire; utilize grazing exclosures for monitoring; grazing excluded until woody and herbaceous plants achieve SG objectives. (Bighorn Basin RMP Revision).	1								Bighorn Basin RMP Revision	O		
S-0054-28	FW	LG									Remove, modify, or mark fences to reduce sage grouse strikes. (Nevada – NE California RMP Amendment, NW Colorado RMP Amendment, Bighorn Basin RMP Revision, Utah RMP Amendment, North Dakota RMP Amendment).	1								Nevada – NE California RMP Amendment; NW Colorado RMP Amendment; Bighorn Basin RMP Revision; Utah RMP Amendment; North Dakota RMP Amendment	O		
S-0054-29	FW	LG									Permanent retirement of grazing allotments will be considered on a willing-permittee basis. (Bighorn Basin RMP revision, Miles City RMP revision).	1								Bighorn Basin RMP revision; Miles City RMP revision	O		

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S-0054-30	FW										General Sage Grouse Habitats: Limit motorized use to existing roads and trails pending travel management planning. Complete planning within 5 years of ROD. (California-Nevada RMP Amendment, North Dakota RMP Amendment).	1								California-Nevada RMP Amendment; North Dakota RMP Amendment	O	
S-0054-31	FW	TM									Conduct restoration of roads, primitive roads and trails not designated in travel management plans. (North Dakota RMP Amendment).	1								North Dakota RMP Amendment	O	
S-0054-32	FW	LR									Site and/or minimize linear ROW to reduce disturbance to sagebrush habitats. Maximize placement of power lines and transportation routes in existing ROWs. Power lines would be buried, eliminated, designed or sited in a manner which does not impact SG. ROWs would be allowed with appropriate mitigation and conservation measures identified within the terms of the authorization to minimize surface disturbing and disruptive activities. Co-locate new ROWs within existing ROWs where possible. (North Dakota RMP Amendment).	1								North Dakota RMP Amendment	O	
S-0054-33	FW	LR									Exclusion area for renewable energy rights of way; allowable if co-located on industrial facilities for on-site generation. (California-Nevada RMP Amendment).	1								California-Nevada RMP Amendment	O	
S-0054-34	FW	TM									Allow new routes/realignments during site-specific travel planning if it improves GRSG habitat and resource conditions. Allow no upgrading of existing routes that would change route category (road, primitive road, or trail) or capacity unless the upgrading would have minimal impact on sage-grouse habitat, is necessary for motorist safety, or eliminates the need to construct a new road. (North Dakota RMP Amendment).	1								North Dakota RMP Amendment	O	
S-0054-35	FW	ME									Find unsuitable for coal surface mining. (NW Colorado RMP Amendment).	1								NW Colorado RMP Amendment	O	
S-0054-36	FW	LR									High-profile structures exceeding 10 feet in height, would be eliminated, designed or sited in a manner which does not impact sage grouse. Permanent (longer than 2 months) structures which create movement must be designed or sited to minimize impacts to greater sage grouse. (North Dakota RMP Amendment).	1								North Dakota RMP Amendment	O	
S-0054-37	AA	FW									Noise limited to no more than 10 dBA above ambient, where technologically feasible. (Buffalo RMP revision).	1								Buffalo RMP revision	O	
S-0054-38	FW	LR	ME								Bury new distribution lines within 1 mile of leks. (HiLine RMP revision).	1								HiLine RMP revision	O	
S-0054-39	FW	LG									Avoid all new structural range developments and location of supplements (salt or protein blocks) unless independent peer-reviewed studies show that the range improvement structure or nutrient supplement placement benefits sage grouse. (North Dakota RMP Amendment).	1								North Dakota RMP Amendment	O	
S-0054-40	FM	FW	VC								Do not use fire in precipitation zones < 12", except as last resort and where conditions allow and cheatgrass is a very minor component. (Northwest Colorado RMP Amendment).			1						Northwest Colorado RMP Amendment	O	
S-0055-01	AA	CR	FW	RV	WC	WR					In developing your new Resource Management Plan I ask you to give strong consideration to protecting areas with wilderness characteristics. Wild areas provide the best wildlife habitat, clean water, and, in my opinion, by far the best opportunity for recreation such as hiking and hunting away from the crowds. Please conduct wilderness inventories on all lands which may qualify for protection and on areas which contain critical wildlife habitat, historical values, and opportunities for quiet, non-motorized recreation. This should include areas that have the potential for restoration from past damage, current noxious weed infestations, or areas with illegal or damaging off road vehicle use. Prevention of further degradation and restricting further damage now, while the planning process is ongoing, is necessary. Given the vast expanse of the Lewistown management area, I strongly encourage you to take advantage of wild land inventories done by non-governmental groups, such as the Montana Wilderness Association.	1									I	
S-0055-02	FW	ME	RV								I realize that development for industrial use is a legitimate use of our public land. With the vast amount of land already developed, I'd like to see future development limited to areas that do not abut critical wildlife habitat and do not affect the potential for primitive, non-motorized recreation.	1									I	
S-0056-01	LR	RV	SE								1. Use a systematic interdisciplinary approach to integrate physical, biological, economic, and other sciences. BLM should place a high priority on consistency when evaluating human activities' impact on the landscape when assessing existing uses and developing new management directives. For example, when evaluating the safety concerns associated with various forms of outdoor recreation (mountain biking, recreational shooting, hiking, horseback riding), it is critical that BLM use comparable metrics such as accident statistics to identify legitimate safety issues and convey them to the public via the formal planning process. Additionally, BLM should take great care to evaluate and utilize economic and participation data throughout the planning process. According to the U.S. Fish and Wildlife Service's 2011 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation, 267,000 anglers spent 2,450,000 days fishing in Montana and spent \$339,383,000 doing so. Additionally, 150,000 hunters spent 2,493,000 days hunting and spent \$627,298,000 on trip-related expenditures, equipment and other items associated with hunting in that year alone. In 2011, 7.2 million people nationwide shot recreationally, with only 2.9 million visiting shooting ranges. Many of these remaining 4.1 million recreational shooters depend on access to informal shooting on federal land in order to continue recreating as they have for many decades. When considering management proposals or activities that would impede access to hunting, fishing or recreational shooting throughout the planning process, BLM should take these figures and others into consideration. Additionally, BLM should note and discuss the impact that impeding recreational access would have on local economies, the ability to collect state and local taxes and revenues collected through the Wildlife and Sportfish Restoration programs which collect taxes on the manufacture of firearms, ammunition, fishing tackle and other outdoor equipment taxed to support conservation.			1						U.S. Fish and Wildlife Service's 2011 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation	O	

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S-0058-02	AP	ME	WC								Oil and gas companies are enjoying their Bakken playground in next-door North Dakota, at the same time as thousands of private acres have been taken out of the Conservation Reserve Program and converted to cropland. These two contextual facts mean it is even more critical than usual that your RMP provide balance in Montana. We urge you to consider this wider context as you write the "Affected Environment" section of your Draft RMP. We would also respectfully ask that you incorporate citizen wilderness inventories in your planning process.	1									O			
S-0058-03	AP										We have one recommendation about how BLM can manage Lewistown Field Office lands in a way that also protects the Monument, and reflects the values of the Conservation Lands: Please manage this area – particularly the areas directly adjacent to the Monument – at the landscape level, as is required by BLM’s own orders and strategies. This means managing these areas in ways that are consistent with the management of the National Monument. BLM’s own manual for the day-to-day management of such monuments directs that “NLCS units will be managed as an integral part of the larger landscape, in collaboration with all BLM programs” (p. 1-6, 6100 – National Landscape Conservation System Management Manual). BLM’s own strategies also call for landscape-scale management (please see two strategies, “The National Landscape Conservation System: 15-Year Strategy 2010-2025,” and “Bureau of Land Management Montana/Dakotas: National Landscape Conservation System, Three-Year Strategy 2013-2015”). The necessity for BLM to manage the Monument at a landscape level should be mentioned in the “Affected Environment” chapter of your Draft RMP, so that your baseline assessment includes a crucial piece of information about wildlife corridors and other connectivity between the Lewistown Field Office and the Monument.											6100 – National Landscape Conservation System Management Manual, p. 1-6; The National Landscape Conservation System: 15-Year Strategy 2010-2025; Bureau of Land Management Montana/Dakotas: National Landscape Conservation System, Three-Year Strategy 2013-2015	O	
S-0058-04	FW	VC	WC								3. Rapid Ecoregional Assessment We would urge BLM to consider wildlife corridors, wilderness inventories and other data when creating management plans for the Monument area (ie the Lewistown Field Office). Please consider using the Rapid Ecoregional Assessment for the Northwestern Plains (whenever it’s released) to inform yourselves where the important linkages are and to protect these lands appropriately.								1	Rapid Ecoregional Assessment	O			
S-0058-05	AC	LR									4. Public access We would urge BLM to identify opportunities to improve public access to public lands, and to consolidate public lands through acquisitions, land trades, and conservation easements.	1									O			
S-0058-06	FW	LR	ME	WC							5. Industrial activities We would like BLM to identify places where industrial activities like oil and gas wells, pipelines, wind farms, and mines will have the least impact, and to direct development there. We would also urge you to prepare a Master Leasing plan for any areas in the Field Office where oil/gas potential and wilderness characteristics or critical sage-grouse habitat overlap.										O			
S-0059-01	AP										Public Involvement We request that the BLM make available geospatial data to the public to assist in identifying new data needs. Please look at the BLM Arizona’s web page at http://blm.gov/az/GIS/files.htm#strip for a good model of data availability for baseline information.							1		Won't be addressed in the RMP, but data will be made available http://blm.gov/az/GIS/files.htm#strip	O			
S-0059-02	AP	WC									Environmental Consequences In order to conduct an effective analysis, BLM needs to assess impacts and effects such as ecological, aesthetic, historic, cultural, economic, social, or health, whether direct, indirect, or cumulative. 40 C.F.R. § 1508.8. To date, we have seen only marginal analyses of the environmental impacts to Lands with Wilderness Characteristics (LWCs). A thorough analyses will help the public and the BLM to understand the short and long-term consequences of proposed actions.										O			
S-0059-03	AP										Proximity to other Resource Areas Considering the proximity of the Lewistown unit to other areas with approved or adopted resource-related plans, the BLM should include an evaluation of and prescriptions for how the plan will be consistent with the Upper Missouri River Breaks National Monument, Charles M. Russell National Wildlife Refuge, and the Flathead National Forest. 43 C.F.R. § 1610.3-2. The Lewistown planning area shares many similar values to these resource areas and should be viewed in the larger context as part of a contiguous landscape. The Antiquities Act of 1906 (16 U.S.C. §§ 431-433) requires that the BLM protect and manage the objects of scientific and historic interest listed in the Presidential Proclamation that established the Monument. This RMP should include goals and objectives that support the goals and objectives described in the Proclamation that cross into the planning area or that could potentially impact the UMRBNM.	1									Upper Missouri River Breaks National Monument, Charles M. Russell National Wildlife Refuge, and the Flathead National Forest plans; 43 C.F.R. § 1610.3-2; Antiquities Act of 1906 (16 U.S.C. §§ 431-433)	O		
S-0059-04	AC	LR	WC								Land Tenure Land tenure in the Lewistown planning area has already proven to be a controversial topic. In light of present circumstances, the BLM should review the previous Judith Resource, Headwaters, and Judith-Valley-Phillips RMP documents, and look at future land tenure decisions to develop a trend towards retaining sensitive and ecologically important areas, revisiting previously-identified disposal lands, and providing adequate open space for the public. As population increases, it will be crucial that consideration be given to providing adequate open space and trails on public lands. Particular attention should be taken to prevent the sale or exchange of BLM lands highly valued by local communities for their open space, wildlife habitat, and recreation opportunities they provide. Also, LWCs should be a priority as land configuration is an important consideration. Land sales or exchanges that can improve continuity, recreational opportunities, or wildlife habitat within or surrounding LWCs and ACECs should be a priority through conservation easements, land trades, and land acquisitions.	1										O		

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S-0059-05	AP	WC									Lands with Wilderness Characteristics We expect that the BLM will adhere to the documentation and minimum standards for review outlined in BLM manual 6310. During the summer of 2014, we will be inventorying many of these lands ourselves. We hope that, where appropriate, the BLM will consider our findings "new information" and evaluate it as such. We also strongly encourage the BLM to inventory BLM lands that surround existing WSAs which include Cow Creek, North Fork of the Sun River, Musselshell Breaks, Square Butte, Bridge Coulee, Beaver Meadows, and Antelope Creek. Please re-consider Arrow Creek as a potential LWC through modified boundary delineation in regards to the existing ROWs. Also, units with existing leases should not be precluded from becoming an LWC.	1									BLM Manual 6310	O		
S-0059-06	AP	LR	WC								a) Boundary Delineation We ask that the BLM take a flexible approach to boundary delineation. While we would like to see the maximum amount of acreage protected for their wilderness characteristics, we also want to be realistic and recognize that not every acre within a potential boundary will possess wilderness characteristics. However, we do want to point out that an area can have wilderness characteristics even though every acre within the area may not meet all the criteria and that the location of boundaries should primarily be set to exclude the unnatural portions of the area. BLM Manual 6310.06(C)(3)(e). Also, developed rights-of-ways (ROW) should be treated like other impacts, and the boundary should be drawn to exclude those ROWs. Please give the same consideration for all potential LWCs. As with some field offices, GIS is sometimes favored over a field visit and can lead to unfortunate conclusions. Often times, this can be the case for potential units under 5,000 acres. Not all units under 5,000 acres should be considered as a LWC, except for those that demonstrate that the area is of sufficient size as to make practicable its preservation and use in an unimpaired condition.	1										BLM Manual 6310.06(C)(3)(e)	O	
S-0059-07	AP	WC									b) Naturalness The BLM should ensure that specialists that are involved with determining naturalness for an area are mindful of BLM Manual 6310.06(C)(2)(b). Apparent naturalness is meant to be perceived by the average visitor who is not familiar with the biological composition of natural ecosystems versus human-effected ecosystems. This disposition will be important because this area can be considered cattle country to some and there will undoubtedly be various types of range improvements. Also, human impacts outside of the boundary should not normally be considered unless the impact is pervasive and omnipresent.									1	BLM Manual 6310.06(C)(2)(b)	O		
S-0059-08	AP	WC									c) Outstanding Opportunities for Solitude or a Primitive and Unconfined Type of Recreation The word or in this definition means that the area only has to have one or the other but not both in order to have wilderness characteristics. Nor does it have to possess outstanding opportunities on every acre. We advise the BLM to follow BLM Manual 6310's mandate to not compare lands in question. The Miles City Field Office wrote in their description of opportunities for solitude on Wrangler Creek MT-020-041 that "The solitude is present; however you can see imprints of man (town of Broadus within 5 miles), so it is not considered outstanding and is typical of Eastern Montana." This is an example of comparing the parcel with other areas and stereotypes surrounding wilderness characteristics. Please do recognize that outstanding opportunities are present regardless of the amount of use. We know that these areas are generally of high hunting values and therefore experience high volumes of traffic at different times of the year. However, this should not exclude opportunities for solitude or primitive recreation on any average day of the year.									1	BLM Manual 6310 ; Miles City draft RMP w/LWC inventory	O		
S-0059-09	AP	WC									d) Supplemental values We realize that supplemental values are not required to be present in order for an area to be identified as lands with wilderness characteristics. However, in the lieu of the recent sage-grouse amendment, extra care should go to documenting these values where they exist whether they be ecological, geological, scientific, educational, or historical.									1	BLM Manual 6310	O		
S-0059-10	AP	WC									e) Other It is important that the BLM follow its multiple use and sustained yield mission and FLPMA's guidance. These public lands are to be managed for the protection of quality of scientific, scenic, historical, ecological, and archaeological values; for preservation and protection of certain lands in their natural conditions; to reconcile competing demands; to provide habitat for fish and wildlife; and to provide for outdoor recreation. FLPMA also requires the BLM to prepare land use plans that may limit certain uses in some areas. 43 U.S.C. § 1712. Our interpretation of multiple use is that it does not mean all things in all places, but to prioritize the protection of competing values for an area. This is yet another argument for the importance of a thorough wilderness inventory and proper documentation of findings.										1	FLPMA; 43 U.S.C. § 1712	O	
S-0059-11	WC										A thorough inventory of potential LWCs will also provide the BLM with important landscape-scale data that can be used to identify and accomplish habitat restoration.			1							O			
S-0059-12	CR	WC									As this area is considered to be Lewis & Clark country, it is imperative that these resources remain protected. We recommend that the BLM consider the work of George N. Ruebelmann's "An Archaeological Study of the Lewistown BLM District."									1	"An Archaeological Study of the Lewistown BLM District" by George N. Ruebelmann	O		
S-0059-13	RV	SE	WC								Recreational opportunities provided by wilderness quality lands lead directly to economic benefits to surrounding local communities . . . Because of the nature of the communities residing in the Lewistown planning area, we advise the BLM to examine the report by the Sonoran Institute "Prosperity in the 21st Century West – The Role of Protected Lands." This report found that: Protected lands have the greatest influence on economic growth in rural isolated counties that lack easy access to larger markets. From 1970 to 2000, real per capita income in isolated rural counties with protected land grew more than 60 percent faster than isolated counties without any protected land. This clearly shows that wilderness quality lands and their due protection are economically vital for local economies.										1	"Prosperity in the 21st Century West – The Role of Protected Lands" - report by the Sonoran Institute	O	

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S-0063-01	AP	SE									As a federal land management agency responsible for managing public land for a multiple of uses, the Cascade County Commissioners encourage you to fairly balance conservation and commercial uses. Given the fragmented nature of many BLM lands, it is especially important to ensure that management prescriptions are compatible with surrounding lands. At the same time, decisions made now will be longstanding and should be made with a view toward the future.	1									CY					
S-0064-01	RV	TM									MMBA wishes for this BLM planning effort to identify areas near small towns that hold future potential for non-motorized recreational trails. These areas ideally should be within 20 miles or less to communities with schools, homes, stores, or other facilities. we have identified two areas. Near Lewistown, on BLM lands in the Judith Mountains, exists the Limekiln Trail. But the town could use and enjoy more miles of trail. Trails that reach out northward along this island range, and trails that form loops that reduce driving requirements should be a future goal. Eventually every trail built will be a valued community resource. Lewistown is a large enough town to need several more trails, each providing a different experience. Near Winnett, on BLM lands from Cat Creek north to Blood Creek, a singletrack trail could become a legacy and valued resource for area residents. From a trailhead near Cat Creek, singletrack trail could wind along through the hills and coulees above the Musselshell River. Not all of the BLM land is contiguous, but the Lower River Road ties everything together. Ideally a trail in this area could be used not only for bicycling, but for horse riding, cross-country running, and hiking as well. A trail could be formed by planning and building several loops, eventually tying them together by easements. It remains to be seen if the people of Winnett would accept this concept, but the first step would be to identify this location as a potential recreational resource. Certainly if a trail was eventually constructed and enjoyed, Winnett would collect benefits that accompany recreational trails, including better health, recreational choice, and a new source of economic diversity. Ideally every small community should have trails for residents to enjoy. While it's not the duty for the BLM to provide for all small Montana towns, we think these are two important recreational locations in the Lewistown planning area that must be identified in the RMP.														O	
S-0065-01	AP	WC									Consider citizen inventories when planning areas that are considered Lands with Wilderness Characteristics (LWC areas). Citizen inventories would be conducted in accordance with BLM manuals 6310 and 6320 in order to reflect the new inventory process.	1					DC-02		Conducted in accordance with BLM Manuals 6310 and 6320 in order to reflect the new inventory process.		I					
S-0065-02	AC	LR									Consider land-swaps and/or conservation easements with private citizens if the action results in increased public access or improved habitat connectivity for species. Creating a management plan on a landscape level has been shown to improve the health of the landscape and increase biodiversity in critical areas. Creating areas that allow for landscape level management will allow for a more comprehensive scale of planning. Additionally, 'islands' of BLM land that are not publically accessible, such as that in Durfee Hills in Fergus County, are of little value to the public due to their restricted access. Facilitating mutually beneficial agreements with private citizens will create improved management practices and increase public access.	1											I			
S-0065-03	LR	ME									Plan for industrial development (i.e. pipelines, wind farms, communication towers, mines) on public land in a way that prioritizes minimal habitat disturbance. This does not oppose all development, but rather encourages a land management strategy that gives equal weight to ecosystem and economic concerns. As the "Last Best Place" Montana has the unique characteristic of minimally developed public lands that can still be utilized for recreational activities without signs of human development. However, prioritizing economic concerns over ecosystem values will result in the eventual erosion of these natural spaces.	1											I			
S-0065-04	RV	SR	VC								Give special consideration to areas that have been previously disturbed and can be restored to their full potential as recreational and multi-use sites. Public lands with high levels of disturbances are not able to be used to their full potential. Creating a plan for noxious weed and erosion management will allow these places to be put to full use, which will improve the sites for future generations.	1											I			
S-0066-01	FW	LG	LR	PS	RV						The first issue to be addressed is Public Safety! This has to do with a piece of BLM land that dissects deeded lands, a county road splits this north and south. We have been here almost 30 years, with little or no problems. In the past 5 years however, problems have escalated into nightmares - loss of livestock due to gunshot (documented by the Montana Dept. of Livestock, constant trespass of deeded lands, hunter/hunter conflicts, wildlife & livestock harassment, hunter/landowner conflicts and miles of extra fence repair. Our ranch headquarters are within 1/2 mile of this conflict area causing concern for our own safety! Also the garbage is of concern. There are also law enforcement/landowner confrontation which was documented and vindicated.		1									Not a wildlife issue that will be addressed. Check MFWP's regulations; check on issues occurring in Butte, Helena and North Dakota. Dan will follow up on this.		B		
S-0066-02	SR	TM									2nd issue is the chronic traveling off-road on highly erodible soils, and needing to go as far as to look at Administrative Off-Road Travel Policy on highly erodible soils, especially when it is wet and muddy!	1								Administrative Off-Road Travel Policy		B				
S-0066-03	LG	RV									3rd issue, fairness in land use - we as grazing leases have to pay a fee plus take care of the land, up keep the fences and provide water on these allotment, while recreationers pay no fees and for the most part do not take care of the land!					1						B				
S-0066-04	WC										These issues might be resolved somewhat if these BLM lands were included into the Cat Creek LWC Land?			1								B				
S-0067-01	AP										"Save" Comment noted on map of the planning area at a public scoping meeting; BLM parcel adjacent to Forest Service on Rocky Mountain Front southwest of the Teton River was circled.				1							I				
S-0068-01	FW	RV	SR	TM	VC						"Issues for this parcel: ORV use, erosion of former logging roads, noxious weeds, conflicts with bears and subdivision development to the south (Elk Meadows)" Comment noted on map of the planning area at a public scoping meeting; BLM parcel close or adjacent to Highway 200 approximately 6 miles south of Dearborn River.	1								GB management from CS will be an alternative		I				

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S-0069-01	FM	FW	LG	WR							Although the BLM land in our pasture can't be fenced because of the roughness of the Missouri River Breaks area, we take care of it the same as for our own pasture. We do not overgraze our pasture. Fewer cattle are pastured in a dry year. It is a fact that grazing makes healthier grass not only for cattle but also for wildlife. The fuel for wildfires is greatly reduced. We provide water sources for our cattle and wildlife also benefits. In other words, we manage this environment to be productive and the Federal government has an income from BLM land. If cattle grazing should be reduced, wildlife will certainly suffer, and probably move to other areas.	1								specific allotment comment won't be address, but different levels of grazin	B					
S-0069-02	FM	TM									We need to keep the roads that are presently used, especially for fighting fires.		1								B					
S-0070-01	ME	WC									I have always felt at home in Central Montana's open country and would like to see more of this land protected as wilderness. As more people use roadless and wilderness areas for recreation more BLM land will be needed to provide quiet recreation. I urge the BLM to carefully inventory their roadless lands with an eye to protecting more of the magnificent wild country. This should be done before increasing energy development.	1						DC-01, as Modified					I			
S-0070-02	SD	WC									Any lands adjoining existing protected areas such as the Missouri Breaks/CM Russell Nat. Wildlife Refuge. and Lands adjoining the Rocky Mountain Front should receive protection as part of a combined Rocky Mountain Front Heritage Act Strategy.				1			DC-04, as Modified		Rocky Mountain Front Heritage Act Strategy		I				
S-0071-01	LG	RV	TM								I am writing to request that any revisions to the travel plan include as much acreage and access for OHVs as possible. Public lands are just that - public - and they should be maintained for the use and enjoyment of EVERYONE, not just the people who oppose resource development, OHVs, horses, bicycles, cows and ever other conceivable use except walking in tennis shoes. "Saving public" land doesn't mean eliminating all other types of uses on the land otherwise there is nothing we are saving the lands for. Keep access open for all users on PUBLIC lands.	1											I			
S-0072-01	AP	LG									Hopefully, the LRMP will sufficiently address the environmental impacts of livestock grazing. The LRMP must present the depth of analysis and consideration of grazing alternatives warranted by a land use plan for all BLM-managed lands in central Montana.	1								Refer to data cited in this comment letter.		O				
S-0072-02	AP	FW	LG	VC							Maintaining and improving wildlife habitat and restoring degraded range conditions should be reflected in the purpose and need for the LRMP in compliance with both the Taylor Grazing Act of 1934, the Federal Lands Policy Management Act (FLPMA) of 1976, and other laws that govern livestock management on public lands.	1								Taylor Grazing Act of 1934; Federal Lands Policy Management Act (FLPMA) of 1976; also refer to data cited in this comment letter.		O				
S-0072-03	AP	FW	LG	VC							Thus, the reason for addressing livestock grazing in the LRMP is to improve the range condition of the allotments within the project area and to maintain and improve wildlife habitat. This direction, based on laws and regulations, should be explicitly stated in the "Purpose and Need for the Plan" in the DEIS. Furthermore, the selection of any alternative in the DEIS that does not provide direction for meeting those goals violates the intent of the laws and regulations that govern public land management.										Refer to data cited in this comment letter.		O			
S-0072-04	AP	FW	VC								The purpose and need section of the DEIS should include the need to conserve all wildlife habitat and restoration of degraded range conditions as a purpose of the document.	1								Refer to data cited in this comment letter.		O				
S-0072-05	AP	LG	SR	VC	WR						In the Anticipated Planning Issues Management Concerns document provided with the scoping notice, the BLM offers the following in regard to livestock grazing: Preliminary Planning Considerations > Conform with existing laws, regulations, and BLM policy pertaining to livestock grazing on public lands > Incorporate Montana Standards for Rangeland Health and Guidelines for Livestock Grazing Management > Consider ecological site inventory information > Protect important biological resource functions that provide for soil stability, water quality, and healthy riparian and upland vegetation communities > Provide for the protection and restoration of native species and potential natural communities > Authorize use to minimize environmental impacts under the principles of multiple use and sustained yield. The LRMP must specifically address how these goals will be achieved. For example, Guideline #1 of the Montana Standards for Rangeland Health and Guidelines for Livestock Grazing Management provides that "[g]razing will be managed in a manner that will maintain the proper balance between soils, water, and vegetation over time." While such guidelines articulate important goals, those goals will not be achieved without requiring that land managers meet quantitatively measurable terms and conditions. The LRMP must provide clear, quantitative terms and conditions to guarantee compliance with those guidelines.												Montana Standards for Rangeland Health and Guidelines for Livestock Grazing Management; also refer to data cited in this comment letter.		O	
S-0072-06	FW	LG	VC	WR							In regards to livestock grazing generally, Western Watersheds Project urges the BLM to incorporate the following in the LRMP: Specific measurable terms and conditions for livestock grazing in riparian areas, uplands, and wildlife and fisheries habitat, including: (i) a minimum of 7" stubble height remaining on hydric soils riparian greenlines after livestock grazing (ii) a 10% maximum annual bank or wetland alteration from all sources for streams and wetland hydric and mesic soil areas of upland seeps, springs, wet meadows and aspen clones (iii) a maximum annual woody browse utilization by all browsing ungulates of 15% on cottonwood, aspen, woody shrub, and willows (iv) a maximum annual grazing utilization of perennial grass species on upland landscapes by all grazer of 35% (v) a minimum 9" residual perennial native grass cover for ground-nesting birds like sage-grouse and sharp-tailed grouse.									1			Refer to data cited in this comment letter.		O	

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S-0072-07	LG	VC									The LRMP must identify how suitability determinations have been made for each of the allotment whether it is currently authorized for grazing or unallocated. Any allotments that do not meet the criteria described in Guideline #3 must be reevaluated. Unfortunately, according to the Anticipated Planning Issues Management Concerns document, it appears the BLM only intends to review currently unallocated parcels.	1								Refer to data cited in this comment letter.	O	
S-0072-08	FW	LG	VC	WR							The BLM must scientifically and accurately determine those lands which are capable and suitable for livestock grazing. The BLM must also accurately and quantitatively determine how much forage (i.e. forage capacity) is currently available. Additionally, the BLM must properly allocate that forage to watershed and stream protection, wildlife habitat and food, then to livestock if available.	1								Refer to data cited in this comment letter.	O	
S-0072-09	LG	VC									As the LRMP must certainly acknowledge, the quality of the land in the project area is severely diminished. Thus, when the LRMP seeks to improve range condition, as it must, what this really means is that the LRMP must provide for improved riparian, upland, and wildlife habitat conditions and include goals, terms and conditions, and standards to achieve those goals.	1								Refer to data cited in this comment letter.	O	
S-0072-10	AP	LG	VC								The correction of resource degradation caused by domestic livestock and the prevention of future degradation should be driving forces behind the LRMP and should be reflected throughout the NEPA document and in any future agency decisions regarding domestic livestock grazing in the project area. The Alternatives in the DEIS must set specific livestock grazing levels that will be used to meet standards.	1								Refer to data cited in this comment letter.	O	
S-0072-11	LG	VC									Simply stating that specific standards will be developed at the site specific level violates law and allows the BLM to continue the degradation caused by domestic livestock. The BLM must establish allowable use levels as required by both 43 CFR Sec 4100.0-8 and 43 CFR 1601.0-5(b) by including maximum livestock utilization standards in the LRMP.	1								43 CFR Sec 4100.0-8; 43 CFR 1601.0-5(b); also refer to data cited in this comment letter.	O	
S-0072-12	AP	LG	VC								The BLM must define what constitutes a sustainable level of livestock grazing. "Sustainability" is defined in the glossary as "[t]he ability of an ecosystem to maintain ecological processes and functions, biological diversity, and productivity over time." ⁴ The DEIS must explain how it meets this definition of sustainability.	1								*DEIS at 804. Refer to additional data cited in this comment letter. Also add definition of sustainability in the Glossary.	O	
S-0072-13	LG	VC									The LRMP should provide for long-term rest to facilitate recovery. Any discussion of impacts should address the use of peer-reviewed range science principles for management and rely on high standards of performance. The reliance on unfounded solutions such as time-controlled grazing are not adequate for recovery.	1								Refer to data cited in this comment letter.	O	
S-0072-14	FW	LG	VC								The most effective way to protect and restore lands in the planning area would be the elimination of cattle from the landscape, and allow limited the amount of browsing in the area to that by wildlife. Stating that stricter standards will improve range in declining condition is not only a failure to disclose impacts, but it ignores the real problem. In numerous studies of riparian grazing impacts, investigators concluded that total removal of livestock was necessary to restore ecosystem health.	1								Refer to data cited in this comment letter.	O	
S-0072-15	LG	VC									Weighing the impacts of resource management practices is consistent with the BLM's mission of providing lands for multiple uses as recognized in the Multiple Use Sustained Yield Act. The "multiple use" concept as defined in law and regulations requires "a reasoned and informed decision that the benefits of grazing ... outweigh the costs" and a weighing of "the relative values of the resources." ¹⁵ Therefore, the BLM must show that the benefits of domestic livestock grazing outweigh the costs.					1				¹⁵ National Wildlife Federation v. BLM, No. UT-06-91-01 US Dep't of Interior, Office of Hearings & Appeals, Hearings Div. (Rampton, J. 1993), p. 23, the "Comb Wash Allotment" decision. Refer to additional data cited in this comment letter.	O	
S-0072-16	FW	LG	SR	VC							In spite of the evidence of widespread loss of plant productivity and ground cover, accelerated erosion and BLM's own documentation of rapid declines in species such as sage-grouse, BLM routinely chooses not to address livestock impacts in any scientific or sustainable fashion. The LRMP must acknowledge the negative impacts of livestock grazing and propose significant grazing reductions to address these impacts.	1								Refer to data cited in this comment letter.	O	
S-0072-17	LG	VC									Based on 43 CFR 4180, appropriate actions to address the negative impacts of domestic livestock are to be implemented that will result in significant progress toward attainment of the standards no later than the start of the next grazing season. Clearly this has not been accomplished. Given the fact that the number of cows that could be grazed on BLM land in the planning area represents a slight and declining economic influence, this degradation is unacceptable.						1			43 CFR 4180; also refer to data cited in this comment letter.	O	
S-0072-18	FW	LG	VC								Furthermore, Bock et al. ²⁶ reviewed the effect of grazing on Neotropical migratory landbirds in three ecosystem types, and found an increasingly negative effect on abundances of bird species in grassland, riparian woodland, and Intermountain shrubsteppe (almost equal numbers of species with positive and negative responses to grazing in grassland; six times as many with negative as positive responses in shrubsteppe), but impacts to these species are lacking in the DEIS.					1				²⁶ Bock, C.E., V.A. Saab, T.D. Rich, and D.S. Dobkin. 1993b. Effects of livestock grazing on Neotropical migratory landbirds in western North America. Pages 296-309 in D.M. Finch, and P.W. Stangel, editors. Status and management of Neotropical migratory birds. General Technical Report RM-229. Forest Service, Rocky Mountain Forest and Range Experiment Station, Fort Collins, Colorado. Refer to additional data cited in this comment letter.	O	

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S-0072-19	FW	LG	VC								Since sagebrush communities on private lands have been converted to agricultural or other uses or are not being managed in a manner compatible with sagebrush dependent wildlife, the importance of maintaining the integrity of sagebrush habitats on BLM lands within the planning area to provide taller, denser stands for mule deer, pronghorn, and sage-grouse is extremely important. For example, big sagebrush canopy cover values on undisturbed relicts and kipukas does not support the assertions by the BLM that big sagebrush canopy cover increases due to livestock grazing. ⁴¹ In fact, the just cited researchers found the following: · Big sagebrush canopy cover was higher inside grazing enclosures and was decreased outside enclosures, · Perennial grasses and sagebrush canopy cover were significantly higher in ungrazed vs. grazed plots, · After grazing had been removed big sagebrush canopy cover and grass cover increased significantly.										1	⁴¹ Holechek, Jerry L., and Thor Stephenson. 1983. Comparison of big sagebrush vegetation in northcentral New Mexico under moderately grazed and grazing excluded conditions. <i>Journal of Range Management</i> . 36:455-456 Eckert, Richard E. Jr., and John S. Spencer. 1986. Vegetation response on allotments grazed under rest-rotation management. <i>Journal of Range Management</i> . 39:166-174; Pearson, L.C. 1965. Primary production in grazed and ungrazed desert communities of eastern Idaho. <i>Ecology</i> . 46:278-285; Anderson, Jay E. and Karl E. Holte. 1981. Vegetation Development over 25 years without grazing on sagebrush dominated rangeland in southeastern Idaho. <i>Journal of Range Management</i> . 34:25-29; Wambolt, Carl L. and Myles J. Watts. 1996. High stocking rate potential for controlling Wyoming big sagebrush. In: Barrow, Jerry R. et. al. comps. <i>Proceedings: shrubland ecosystems dynamics in a changing environment</i> . 1995 May 23-25; Las Cruces, NM. Gen. Tech. Rep. INT-GTR-338. Ogden, UT: USDA Forest Service, Intermountain Research Station; Peterson, Joel G. 1995. Ecological implications of sagebrush manipulation – A literature review. <i>Montana Fish Wildlife and Parks, Wildlife Management Division, Helena, MT</i> ; Wambolt Carl L. and Harrie W. Sherwood. 1999. Sagebrush response to ungulate browsing in Yellowstone. <i>Journal of Range Management</i> . 52:363-369. Refer to additional data cited in this comment letter.	O				
S-0072-20	AP	LG	VC								Anderson and Inouye ⁴² found that contemporary state-and-transition models do not fit the sagebrush ecosystem because viable remnant populations of native grasses and forbs are able to take advantage of improved growing conditions when livestock are removed. They found further that despite depauperate and homogenous conditions of permanent plots in 1950, after 45 years vegetation had been anything but static, clearly refuting claims of long-term stability under shrub dominance. Mean richness per plot of ALL growth forms increased steadily in the absence of domestic livestock grazing. Grasses and forbs increased significantly. Given these findings, perhaps the BLM should analyze the impacts of long-term active management and its impacts on sagebrush communities and obligates compared to the impacts of removing livestock and allowing these communities to recover naturally. Additionally, since the continued “management” of sagebrush has led to many of the situations scientists now agree are threatening these ecosystems, the removal of livestock from sagebrush communities in less than satisfactory condition should be a seriously considered alternative in the LRMP.											1	⁴² Anderson, Jay E. and Rishard S. Inouye. 2001. Landscape-Scale Changes in Plant Species Abundance and Biodiversity of a Sagebrush Steppe Over 45 Years. <i>Ecological Monographs</i> , 71(4), 2001, pp. 531-556. Refer to additional data cited in this comment letter.	O			
S-0072-21	FW	RV									The 2012 Montana Fish, Wildlife, and Parks (“MTFWP”) counts for the eastern Montana Sage-grouse Management Zone are only 64.9% of the long term average. ⁵⁷ Across Montana, sage-grouse numbers have declined by more than half since 1980. ⁵⁸ Furthermore, hunter harvest estimates have declined even further, dropping from 40,000 birds in 1984 to less than 5,000 in 2011. ⁵⁹ This represents an 87.5% decline in hunter harvest across the State. Please review and share this important sage-grouse data in the final EIS. If you have more site specific information relevant to sage-grouse trends and habitat conditions within the planning area, please reveal it in the DEIS as well.												1	⁵⁷ Montana Fish, Wildlife & Parks. June 20, 2012. Interoffice Memorandum From: Rick Northrup To: George Pauley. Re: Sage-Grouse AHM lek results from spring 2012. ⁵⁸ id. ⁵⁹ id. Refer to additional data cited in this comment letter. Refer to additional data cited in this comment letter.	O		
S-0072-22	FW	VC									Grazing across many of the Great Basin states has led to the invasion of cheatgrass, a highly flammable noxious weed that accelerates the fire cycle to less than five years destroying the sagebrush upon which sage-grouse rely for food and cover. Approximately 36 percent of the Greater Sage-Grouse range is invaded by cheatgrass. ⁶⁷ Because sagebrush requires at least 15 years (and up to 50) to reoccupy burned sites, restoring invaded areas is a difficult and slow process. Preventing further spread into intact sagebrush should be prioritized.												1	⁶⁷ Lebbin, Daniel J.; Parr, Michael J.; and Fenwick, George H., <i>The American Bird Conservancy Guide to Bird Conservation</i> . The University of Chicago Press, 2010. Refer to additional data cited in this comment letter.	O		
S-0072-23	FM	LG	SR	VC							A recent study published in the <i>Journal of Applied Ecology</i> concludes that livestock grazing contributes to the domination of some western landscapes by cheatgrass, an invasive grass that both destroys sage-grouse habitat and increases the frequency of wildfire. ⁷⁰ To mitigate the spread of cheatgrass, the study suggests maintaining and restoring bunchgrasses and soil crusts, two ecological features quickly degraded under the hooves of livestock. Such mitigation would require the decrease or elimination of livestock grazing in the affected areas.												1	⁷⁰ Reisner, Michael D.; Grace, James B.; Pyke, David A.; Doescher, Paul S. 2013. Conditions favouring <i>Bromus tectorum</i> dominance of endangered sagebrush steppe ecosystems. <i>Journal of Applied Ecology</i> . Refer to additional data cited in this comment letter.	O		
S-0072-24	FW	LG									Antelope are also negatively impacted by livestock and livestock-related fencing. Fences or fragment antelope habitat. Fences pose a serious challenge and create a number of problems for antelope. ⁷¹ Fences can disrupt antelope escape strategies by confusing them, forcing them to slow down, change routes and congregate, in particular in fence corners. BLM must consider the removal of fences on pronghorn habitat within the planning area. Livestock use and presence can also significantly impact pronghorn habitat and behavior. ⁷²													1	⁷¹ Pyrah, D.B. 1987. American pronghorn antelope in the yellow water triangle, Montana: a study of social distribution, population dynamics, and habitat use. <i>Montana Dept. Fish, Wildl. and Parks in cooperation with USDI, BLM</i> . P. 121; Trubak, G., A. Carey and S. Carey. 1995. <i>Pronghorn: portrait of the American Antelope</i> . Northland Publishing, Flagstaff Arizona. P. 138. ⁷² Pyrah, D.B. 1987. American pronghorn antelope in the yellow water triangle, Montana: a study of social distribution, population dynamics, and habitat use. <i>Montana Dept. Fish, Wildl. and Parks in cooperation with USDI, BLM</i> . P. 121. Refer to additional data cited in this comment letter.	O	

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S-0072-25	FW	LG									The DEIS should discuss in detail the vast array of livestock diseases that can significantly harm if not kill native wildlife. Bighorn sheep in particular are extremely susceptible to livestock diseases carried by domestic sheep and goats, which are often asymptomatic to these same diseases. ⁷³ Pasteurella pneumonia and lung worm in particular are spread by domestic sheep.	1									⁷³ Schommer, T and M. Woolever. 2008. A review of diseases related conflicts between domestic sheep and goats and bighorn sheep. USDA Forest Service, Rocky Mountain Research Station, General Technical Report RMRS-GTR-209. 16pp. Refer to additional data cited in this comment letter.	O		
S-0072-26	AP	FW	LG	SE							Additionally, any analysis of grazing is incomplete without a discussion of the effect the practice has had on predators. The most vehement opposition to wolves, bears, and other predators comes from the livestock industry, and is one of the main reasons some of the species are now listed. Predators perform important top-down ecological functions, yet they are consistently eradicated and heavily managed in order to protect livestock on public land, costing taxpayers millions of dollars. The DEIS must include an analysis of the impacts from livestock grazing on predators in the planning area.		1								Refer to data cited in this comment letter.	O		
S-0072-27	AA	AP									As with the rest of the planet, land and habitats within the planning area are undergoing adaptation to climate change, which will affect the distribution and diversity of the species on the landscape ⁷⁴ . In the western United States, both the frequency of heavy precipitation events and the frequency of periods of drought have increased over the past century (Christensen et al., Regional Climate Projections, IPCC Fourth Assessment ⁷⁵). The BLM must evaluate the proposed decision in the context of climate change as both a baseline issue and a cumulative impact to the resources.	1									⁷⁴ http://www.epa.gov/wed/pages/projects/globalclimatechange/Vegetationredistribution.pdf ⁷⁵ http://www.ipcc.ch/pdf/assessment-report/ar4/wg1/ar4-wg1-chapter11.pdf Refer to additional data cited in this comment letter.	O		
S-0072-28	AA	LG									The livestock sector contributes a larger share of carbon emissions than does transport (Steinfeld et al., 2010 ⁷⁶). The environmental analysis should document the expected greenhouse gas emissions from the project for each alternative over the ten-year life of the permit, and the contribution this project will make to overall greenhouse gas emissions within the planning area that contribute to global warming.	1									⁷⁶ Steinfeld, H., Gerber, P., Wassenaar, T., Castel, V., Rosales, M., de Haan, C. 2006. Livestock's long shadow Environmental issues and options. 390 pp. Food and Agriculture Organization of the United Nations. Online at: http://ftp.fao.org/docrep/fao/010/a0701e/a0701e00.pdf Refer to additional data cited in this comment letter.	O		
S-0072-29	AA	FW	LG	WR							The NEPA documents should review the changes that are likely to occur in the project area due to global climate change over the 10-year period of the proposed permit. While uncertainties remain regarding the timing and extent of impacts from climate change, modeling indicates that on average, Montana will likely experience higher temperatures in all seasons; longer dry periods; heavy precipitation events; more frequent droughts; and increased wildfire risk. These changes will affect the landscape of planning area, especially riparian and water resources and the species that depend on them as well as the amount and availability of forage. Landscapes that are less fragmented provide greater opportunity for species to shift ranges without being blocked (Opdam and Wascher, 2004 ⁷⁷). Fragmentation of the landscape through vegetation removal or grazing infrastructure such as fencing exacerbates the challenges that species are already dealing with in trying to adapt to a changing climatic regime. Removing or reducing livestock would both alleviate a widely recognized and long-term stressor and make these public lands less susceptible to the effects of climate change (Beschta et al., 2012 ⁷⁸).	1									http://ftp.fao.org/docrep/fao/010/a0701e/a0701e00.pdf ⁷⁷ Opdam, O. and Wascher, D. 2004. Climate change meets habitat fragmentation: linking landscape and biogeographical scale levels in research and conservation. Biological Conservation, 117: 285-29. ⁷⁸ Beschta, R. L., DellaSala, D. A., Donahue, D. L., Rhodes, J. J., Karr, J. R. O'Brien, M. H., Fleischner, T. L. and Deacon-Williams, C. 2012. Adapting to climate change on western public lands: addressing the impacts of domestic, wild and feral ungulates. Environmental Management, DOI 10.1007/s00267-012-9964-9 Refer to additional data cited in this comment letter.	O		
S-0072-30	AP	SE									The LRMP must meet the requirements of the Federal Land Policy Management Act ("FLPMA"). FLPMA requires the BLM "take action necessary to prevent unnecessary or undue degradation of the lands[.]" 43 U.S.C. § 1732 (b). FLPMA also requires that the BLM manage lands for multiple use "without permanent impairment of the productivity of the land and the quality of the environment with consideration being given to the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output." 43 U.S.C. § 1702(c).								1		Federal Land Policy and Management Act (FLPMA); also refer to data cited in this comment letter.	O		
S-0072-31	LG	SE									While the BLM's need not choose the alternative with the greatest economic return, the BLM also fails to calculate the economic value of grazing. The economic and social value of public lands livestock grazing receives disproportionate weight in BLM planning documents. The importance of public lands grazing to the economy of the region is grossly overestimated. The calculation of the social and economic values of the draft plan should demonstrate a clear understanding and consideration of the conflicts between continued grazing and other uses of the public lands. The BLM must provide a more thorough analysis of the social and economic values of different livestock grazing levels. This analysis must consider the administrative costs of a grazing policy, economic benefits from recreation where grazing is reduced or eliminated, and the cost of negative environmental consequences of livestock grazing in the area.	1										Refer to data cited in this comment letter.	O	
S-0072-32	FW	LG	SE								The administrative costs of public lands grazing are often underestimated in BLM planning documents. Considering only direct costs, BLM range management costs in 2011 totaled \$77.3 million, while income from grazing fees was only \$4.5 million, leaving a net deficit to the U.S. Treasury was \$72.8 million. ⁷⁹ This loss on federal grazing programs fails to consider indirect costs, such as administration of the range program. Estimates of those indirect costs rise well over \$100 million. ⁸⁰ The economic calculations in the DEIS should not ignore potential administrative cost savings from reduced grazing. Decreased grazing would save the BLM costs associated with environmental analysis, litigation, grazing permit administration, predator control, weed spraying, and costly efforts to preserve species harmed by grazing.	1										⁷⁹ Karyn Moskowitz and Chuck Romaniello, Assessing the Full Cost of the Federal Grazing Program, October 2002, 14. ⁸⁰ id. at 17. Refer to additional data cited in this comment letter.	O	

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S-0072-33	LG	RV	SE								Often, public lands recreation provides far more economic benefit to local communities than livestock grazing. Improved environmental conditions that would result from decreased grazing would likely create more jobs and economic development related to outdoor recreation such as hiking, camping, fishing, hunting, and the associated benefits to restaurants, hotels, convenience stores, and other in the area. A 2011 Department of Interior study stated that "[r]ecreation visits to Interior-managed lands in the contiguous United States, Hawaii, and Alaska in 2011 supported over 403,000 jobs and about \$48.7 billion in economic contributions to the communities and regions surrounding Interior-managed land." ⁸³ The DEIS ignores the economic significance of recreation, an economic benefit that would increase with improved land conditions from decreased grazing.								1	⁸³ The Department of the Interior's Economic Contributions: Fiscal Year 2011, July 9, 2012, 152, available at http://www.doi.gov/americasgreatoutdoors/loader.cfm?csModule=security/getfile&pageid=308931 . Refer to additional data cited in this comment letter.	O	
S-0072-34	FW	SE	VC	WR							The LRMP must address the costs of environmental degradation. The value lost from negative environmental impacts to water quality and quantity, aquatic species habitat, riparian and upland wildlife habitat quality and quantity, and native vegetation should be calculated. The DEIS must also address the potential for further exotic species and weed expansions, the costs associated with weeds and flammable invasive species, and the resulting potential for species loss. The viability of wildlife and rare plant populations and the cost to protect and preserve them in the face of chronic grazing degradation demands BLM's attention. If the BLM is to rise to its calling as land administrator for the public, the beauty and intrinsic value of the land, as described by Aldo Leopold, must also be addressed. ⁸⁴	1								⁸⁴ See Aldo Leopold, A Sand County Almanac, Part III: The Upshot: The Land Ethic (1949). Refer to additional data cited in this comment letter.	O	
S-0072-35	FW	LG	SE	VC	WR						In accordance with its multiple use mission, the BLM must consider land uses other than grazing in its calculation of the economic and social values of each alternative, including administrative costs and environmental impacts to water, wildlife, plants, recreation, potential species loss, intrinsic land value, and beauty. Under the Taylor Grazing Act, the BLM must prevent injury to public lands. ⁸⁵ The current grazing utilization levels are unsustainable and the proposed plan must not continue grazing at unsustainable levels. Restoration of the land will require costly action by the BLM. Taking into account the overestimated costs and underestimated benefits of reducing grazing in the planning area, the BLM must provide a thorough and balanced analysis that considers the factors addressed in this comment.	1								Taylor Grazing Act; ⁸⁵ 43 U.S.C. §315(a). Refer to additional data cited in this comment letter.	O	
S-0072-36	LG	VC									As part of the DEIS's explanation of the existing management situation, the DEIS and LRMP must provide an Allotment Management Summary detailing the conditions of each allotment within the planning area. This summary should include not only the number of AUMs permitted on each allotment, but also the actual use or "average use." Without data about actual use, the environmental assessment of livestock grazing impacts may be significantly distorted, especially on those allotments where less than the permitted AUMs are actually grazing on the land. Additionally, this section of the document should include the suspended nonuse AUMs, other forage allocations, specific resource concerns, and management objectives. The attached two-page excerpt from the July 1999 Owyhee LRMP and FEIS offers a great example of an Allotment Management Summary.	1								2-page excerpt from July 1999 Owyhee LRMP and FEIS; Refer to data and attachments cited in this comment letter.	O	
S-0072-37	AP	FW	LG	VC							The National Environmental Policy Act ("NEPA") requires that the BLM consider a reasonable range of alternatives. See 42 U.S.C. § 4332(2)(C)(iii). Considering the presence of endangered, special status, and sensitive species in the planning area, a no grazing alternative and 50% reduction in permitted grazing should be included within the reasonable range of alternatives for the LRMP.	1							National Environmental Policy Act (NEPA); 42 U.S.C. § 4332(2)(C)(iii); also refer to data cited in this comment letter.	O		
S-0072-37	LG										The DEIS and LRMP must also address the fact that livestock sizes, and thus forage consumption, have increased dramatically since the AUM was defined. Failure to address this critical issue will lead to legal vulnerability under NEPA, APA and the False Claims Act.							1	National Environmental Policy Act (NEPA); 42 U.S.C. § 4332(2)(C)(iii); APA; False Claims Act; also refer to data cited in this comment letter.	O		

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	FW	ME	RV	WR																					
S-0073-06	FW	ME	RV	WR							<ul style="list-style-type: none"> • Protections for Blue and Red Ribbon Streams: MTU request that the BLM develop stipulations for oil and gas activities that protect health of Class I and II streams, as well as the quality of experience for anglers who frequent these destination fisheries. For instance, the Billings Field Office is considering the application of ¼ mile NSO stipulations for both Class I and II streams. In order to protect water quality and the quality of experience that these streams provide, we request that the Lewistown Field Office adopt the same level of protection. 	1										O			
S-0073--07	FW	ME	WR								<ul style="list-style-type: none"> • Protections for Perennial Streams: MTU supports a ¼ mile NSO buffer for all perennial streams. Doing so would protect tributary streams that serve as spawning habitat for Class I and II streams, as well as productive trout streams that are not designated Class I or II (e.g. the Sun and Dearborn Rivers.) The effects of oil and gas development along tributaries stream can be just as harmful as the effects of the designated stream sections; after all, sediment and spills flow downstream. The only way to truly protect a fishery is to protect the entire watershed, including tributaries. Moreover, there are important warm water fisheries that might not be significant recreationally, but that have biological importance. Without a buffer for all perennial streams, these resources would lack a significant degree of protection. 	1												O	
S-0073-08	FW	ME									<ul style="list-style-type: none"> • Exceptions, modifications and waivers: Any exceptions, modifications or waivers to stipulations must have concurrence with Montana Fish Wildlife and Parks. Given that BLM is the land manager, but that Fish Wildlife and Parks manages fish and wildlife resources, it is imperative that the agency responsible for managing the resource concur with any determination that a lease exception, modification, or waiver will not adversely affect the resource. 					1							O		
S-0073-09	AP	ME	WR								<ul style="list-style-type: none"> • Impacts of Stream Buffers: Stream buffers (i.e. ½ mile NSO stipulations) are linear in profile, meaning that it feasible to utilize directional drilling technologies to access all of the oil and gas that might underlie these NSO buffer areas. When evaluating the effect of stream buffers on mineral development, we suggest that BLM incorporate this principle into the environmental analysis. 	1											O		
S-0073-10	FW	ME	SE	SR	WR						<ul style="list-style-type: none"> • Impacts of Oil and Gas Development: The environmental analysis should identify the potential impacts oil and gas development will have on fisheries, including conservation populations of Westslope cutthroat trout, impacts to streams with potential for the restoration and reintroduction of Westslope cutthroat trout, and impacts to Class I and II streams. Additionally, this analysis needs to consider that there are two potential sources of impacts from oil and gas development: 1) surface disturbances and associated erosion and sedimentation, and 2) contamination from spills and other accidental releases of chemicals and wastes associated with drilling and production and activities. Any development within a watershed introduces the risk of a spill and the resultant impacts to aquatic habitat and fisheries; these impacts can range from minimal to catastrophic depending on the severity of a given spill. The dual nature of oil and gas impacts (sediment and spills) emphasizes the need for ½ mile NSO stream buffers – the greater the spatial separation between oil and gas development and surface waters, the less chance that a spill will reach and impact a given water body. 	1											O		
S-0073-11	AA	FW	WR								<ul style="list-style-type: none"> • Climate Change: Streams and rivers throughout Montana have experienced deleterious impacts to the aquatic environment in recent drought years due to low stream flows, increased water temperatures, and/or inadequate over-wintering habitat. The environmental analysis should consider the cumulative effects of climate change and drought, including aquatic ecosystems that will be adversely impacted by climate change. By removing other stressors, vulnerable watersheds can be managed to prevent regime shifts brought on by the impacts of climate change. Reducing the effects of land use activities (e.g. applying a ½ mile NSO buffer) will help to offset the effects of climate change by increasing the resiliency of watersheds that support coldwater fisheries. Conversely, management decisions that result in a higher degree of impacts will intensify the effects of climate change. 	1												O	
S-0073-12	FW	RV	SD	WC							<ul style="list-style-type: none"> • Conserve Backcountry Areas: As part of the planning process, we suggest that the BLM evaluate areas of public land that are generally intact, undeveloped and that provide high quality fish and wildlife habitat. For lands that meet these criteria, we ask that the BLM allocate or consider designating these lands as "backcountry conservation areas" (BCA) in order to conserve and restore unfragmented fish and wildlife habitat and dispersed hunting and fishing opportunities. Also, we ask that you consider nominations from the public, both for areas that should be allocated as BCAs and appropriate management prescriptions. 	1							DC-10, as Modified				O		
S-0073-13	ME										<ul style="list-style-type: none"> • Stipulations for Split Estate Lands: The BLM has the authority to apply resource protection stipulations to split estate lands and it is imperative that resources protection measures for oil and gas development are applied regardless of surface ownership. While the BLM does not have the legal authority in split estate situations to regulate how a surface owner manages his or her property, the agency does have the statutory authority to take reasonable measures to avoid or minimize adverse environmental impacts that may result from federally authorized mineral lease activity. Moreover, in order to meet the consistency requirements of FLPMA, the BLM is legally required to apply the same standard of environmental protection to split estate lands as to federal surface. 	1								FLPMA			O		
S-0074-01	WC										<ul style="list-style-type: none"> *Conduct a wilderness inventory on all BLM unroaded lands 5,000 acres or larger in size to assess naturalness, opportunities for solitude or primitive recreation, and supplemental values such as wildlife, historic and cultural sites, geologic features etc. in accordance with the most recent BLM wilderness guidelines. 	1							DC-01			I	FL-03		
S-0074-02	AP	WC									<ul style="list-style-type: none"> *Incorporate and give serious consideration to citizen wilderness inventories in the planning process. 	1							DC-02			I	FL-03		
S-0074-03	FW	SD	WC								<ul style="list-style-type: none"> *Give special consideration to conserving land near existing wildlife refuges or protected areas, such as the CMR National Wildlife Refuge, public lands included in the proposed Rocky Mountain Front Heritage Act, and all other areas that provide critical wildlife habitat. 	1							DC-04	Rocky Mountain Front Heritage Act		I	FL-03		

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S-0074-04	SR	TM	VC								*Identify sites where off-road vehicles have scarred land, have spread noxious weeds, and have created user conflicts and take immediate steps, even if only a holding action, to keep those problems from getting worse, until they can be properly addressed in the travel management plan.	1								I	FL-03		
S-0074-05	AC	LR									*Identify opportunities to improve public access and consolidate public lands through acquisitions, land exchanges, and conservation easements. However, in many cases scattered parcels of public land should be retained in public ownership in order to provide broader access over a larger area, so very careful analysis is needed on this issue.	1						DC-06			I	FL-03	
S-0074-06	LR	ME									*Identify areas where industrial development-oil and gas wells, pipelines, wind farms, transmission lines, communication towers, mines-will have the least impact on wildlands and wildlife and direct activities accordingly.	1						DC-07			I	FL-03	
S-0075-01	WC										*Conduct a wilderness inventory on all BLM unroaded lands 5,000 acres or larger in size to assess naturalness, opportunities for solitude or primitive recreation, and supplemental values such as wildlife, historic and cultural sites, geologic features etc. in accordance with the most recent BLM wilderness guidelines.	1						DC-01			I	FL-03	
S-0075-02	AP	WC									*Incorporate and give serious consideration to citizen wilderness inventories in the planning process.	1						DC-02			I	FL-03	
S-0075-03	FW	SD	WC								*Give special consideration to conserving land near existing wildlife refuges or protected areas, such as the CMR National Wildlife Refuge, public lands included in the proposed Rocky Mountain Front Heritage Act, and all other areas that provide critical wildlife habitat.	1						DC-04	Rocky Mountain Front Heritage Act		I	FL-03	
S-0075-04	SR	TM	VC								*Identify sites where off-road vehicles have scarred land, have spread noxious weeds, and have created user conflicts and take immediate steps, even if only a holding action, to keep those problems from getting worse, until they can be properly addressed in the travel management plan.	1						DC-05			I	FL-03	
S-0075-05	AC	LR									*Identify opportunities to improve public access and consolidate public lands through acquisitions, land exchanges, and conservation easements. However, in many cases scattered parcels of public land should be retained in public ownership in order to provide broader access over a larger area, so very careful analysis is needed on this issue.	1						DC-06			I	FL-03	
S-0075-06	LR	ME									*Identify areas where industrial development-oil and gas wells, pipelines, wind farms, transmission lines, communication towers, mines-will have the least impact on wildlands and wildlife and direct activities accordingly.	1						DC-07			I	FL-03	
COMMENTS RECEIVED AFTER THE OFFICIAL COMMENT PERIOD ENDED																							
S-0076-01	WC										*Conduct a wilderness inventory on all BLM unroaded lands 5,000 acres or larger in size to assess naturalness, opportunities for solitude or primitive recreation, and supplemental values such as wildlife, historic and cultural sites, geologic features etc. in accordance with the most recent BLM wilderness guidelines.	1						DC-01			B	FL-03	
S-0076-02	AP	WC									*Incorporate and give serious consideration to citizen wilderness inventories in the planning process.	1						DC-02			B	FL-03	
S-0076-03	FW	SD	WC								*Give special consideration to conserving land near existing wildlife refuges or protected areas, such as the CMR National Wildlife Refuge, public lands included in the proposed Rocky Mountain Front Heritage Act, and all other areas that provide critical wildlife habitat.	1						DC-04	Rocky Mountain Front Heritage Act		B	FL-03	
S-0076-04	SR	TM	VC								*Identify sites where off-road vehicles have scarred land, have spread noxious weeds, and have created user conflicts and take immediate steps, even if only a holding action, to keep those problems from getting worse, until they can be properly addressed in the travel management plan.	1						DC-05			B	FL-03	
S-0076-05	AC	LR									*Identify opportunities to improve public access and consolidate public lands through acquisitions, land exchanges, and conservation easements. That said, sometimes these scattered parcels of public land should be retained in public ownership in order to provide broader access over a larger area. In sum, very careful case by case analysis is needed on this issue.	1						DC-06			B	FL-03	
S-0076-06	LR	ME									*Identify areas where industrial development-oil and gas wells, pipelines, wind farms, transmission lines, communication towers, mines-will have the least impact on wildlands and wildlife and direct activities accordingly.	1						DC-07			B	FL-03	
S-0077-01	AP	WC									*Wilderness - Conduct a wilderness inventory on all BLM lands 5,000 acres or larger in size to assess naturalness, opportunities for solitude or primitive recreation, and supplemental values such as wildlife, historic and cultural sites, geologic features etc. in accordance with the most recent BLM wilderness guidelines. Also incorporate and give serious consideration to citizen wilderness inventories in the planning process. Avoid an overly strict approach when determining whether an area meets the criteria as a land with wilderness characteristics.	1						DC-01 & DC-02 +				I	FL-04
S-0077-02	FW	SD	WC								*Sensitive Areas - Give special consideration to conserving land near existing wildlife refuges or protected areas, such as the CMR National Wildlife Refuge, public lands included in the proposed Rocky Mountain Front Heritage Act, and all other areas that provide critical wildlife habitat.	1						DC-04	Rocky Mountain Front Heritage Act		I	FL-04	
S-0077-03	SR	TM	VC								*Motorized Vehicles - Although the Draft RMP will not address travel management, but in areas where off-road vehicles are scarring the land, spreading noxious weeds, and/or creating user conflicts actions should be taken to prevent further damage. Even if limits or closure are imposed only as holding actions until they can be properly addressed in the travel management plan, it is important to prevent existing problems from becoming worse.	1						DC-05+				I	FL-04
S-0077-04	AC	LR									*Easements, Acquisitions, Exchanges - Identify opportunities to improve public access and consolidate public lands through acquisitions, land exchanges, and conservation easements. However, in many cases scattered parcels of public land should be retained in public ownership in order to provide broader access over a larger area, so very careful analysis is needed on this issue.	1						DC-06			I	FL-04	
S-0077-05	LR	ME									*Development - Identify areas where industrial development-oil and gas wells, pipelines, wind farms, transmission lines, communication towers, mines-will have the least impact on wildlands and wildlife, and direct activities accordingly.	1						DC-07			I	FL-04	

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S-0078-01	WC										*Lands with Wilderness Characteristics - Conduct a wilderness inventory on all BLM unroaded lands 5,000 acres or larger in size to assess naturalness, opportunities for solitude or primitive recreation, and supplemental values such as wildlife, historic and cultural sites, geologic features etc. in accordance with the most recent BLM wilderness guidelines.	1						DC-01			I	FL-05	
S-0078-02	AP	WC									*Citizen Inventories - Incorporate and give serious consideration to citizen wilderness inventories in the planning process.	1						DC-02			I	FL-05	
S-0078-03	FW	SD	WC								*Sensitive Areas - Give special consideration to conserving land near existing wildlife refuges or protected areas, such as the CMR National Wildlife Refuge, public lands included in the proposed Rocky Mountain Front Heritage Act, and all other areas that provide critical wildlife habitat.	1						DC-04	Rocky Mountain Front Heritage Act		I	FL-05	
S-0078-04	LR	ME									*Development - Identify areas where industrial development-oil and gas wells, pipelines, wind farms, transmission lines, communication towers, mines-will have the least impact on wildlands and wildlife, and direct activities accordingly.	1						DC-07			I	FL-05	
S-0079-01	AP	WC									*Wilderness - Conduct a wilderness inventory on all BLM lands 5,000 acres or larger in size to assess naturalness, opportunities for solitude or primitive recreation, and supplemental values such as wildlife, historic and cultural sites, geologic features etc. in accordance with the most recent BLM wilderness guidelines. Also, incorporate and give serious consideration to citizen wilderness inventories in the planning process.	1						DC-01 & DC-02			I	FL-04	
S-0079-02	FW	SD	WC								*Sensitive Areas - Give special consideration to conserving land near existing wildlife refuges or protected areas, such as the CMR National Wildlife Refuge, public lands included in the proposed Rocky Mountain Front Heritage Act, and all other areas that provide critical wildlife habitat.	1						DC-04	Rocky Mountain Front Heritage Act		I	FL-04	
S-0079-03	SR	TM	VC								*Motorized Vehicles - I realize that the Draft RMP will not address travel management, but in areas where off-road vehicles are scarring the land, spreading noxious weeds, and/or creating user conflicts, actions should be taken to prevent further damage. Even if limits or closures are imposed only as holding actions until these issues can be properly addressed in the travel management plan, it is important to prevent existing problems from becoming worse.	1						DC-05+			I	FL-04	
S-0079-04	AC	LR									*Easements, Acquisitions, Exchanges - Identify opportunities to improve public access and consolidate public lands through acquisitions, land exchanges, and conservation easements. At the same time, in many cases scattered parcels of public land should be retained in public ownership in order to provide broader access over a larger area, so very careful analysis is needed on this issue.	1						DC-06			I	FL-04	
S-0079-05	LR	ME									*Development - Identify areas where industrial development-oil and gas wells, pipelines, wind farms, transmission lines, communication towers, mines-will have the least impact on wildlands and wildlife, and direct activities accordingly.	1						DC-07			I	FL-04	
S-0080-01	AP	VC	WC								Please conduct a wilderness inventory on all lands over 5000 ac. for quality and wildlife habitat and include citizen inventories as well in accordance with the most recent BLM wilderness guidelines. In the process of doing this, damage or signs of off road vehicle use should be documented and the results of these disturbances be noted. Actions should be taken to prevent damage from continuing or the spread of noxious weeds from growing worse without making an effort to curb them.	1						Parts of DC-01 & DC-02, as Modified			I		
S-0080-02	LR	ME									Industrial activities should be carefully considered and not just given carte blanche access or development rights where they don't already exist. Especially fracking for oil and gas or any other activities that will damage the land or water. Industrial activities should be placed where they will do the least damage and maintained in corridors with other development.	1						Part of DC-07, as Modified			I		
S-0081-01	WC										Complete a comprehensive inventory of all natural lands of a minimum size, e.g., 3-5,000 acres.	1						Part of DC-01, as Modified			I		
S-0081-02	WC										Gather the results of previous wildland inventories, consolidating the findings and recommendations.	1						Part of DC-01, as Modified			I		
S-0081-03	WC										Identify lands free of, or with minor, human activity and scarring.	1						Part of DC-01, as Modified			I		
S-0081-04	WC										Scope and group natural lands by proximity of favorable resource values to wildlife and human needs and values.	1						Part of DC-01, as Modified			I		
S-0081-05	WC										Identify lands with exceptional educational and cultural resource value and accessibility.	1						Part of DC-01, as Modified			I		
S-0081-06	WC										Identify lands with native habitat for the preservation and expansion of native creatures.	1						Part of DC-01, as Modified			I		
S-0082-01	WC										The Montana Wilderness Association (of which I am a member) has identified some 200,000 acres of remote, undeveloped BLM land that still have all the characteristics of wilderness. Most of these lands are in the Musselshell Breaks near the C.M. Russell National Wildlife Refuge. But others include unroaded land in the Judith Mountains and intact prairie lands north of Winnett. These areas should be designated as wilderness.					1						I	
S-0082-02	SD										I am also concerned about four "Outstanding Natural Areas" along the Rocky Mountain Front - Blind Horse, Ear Mountain, Chute Mountain, Deep Creek-Battle Creek. These four areas total 13,087 acres. They are included in the Rocky Mountain Front Heritage Act, but until the act is passed, we need to make sure they are conserved in the BLM plan.	1								Rocky Mountain Front Heritage Act		I	
S-0082-03	WC										• Conduct a wilderness inventory on all BLM lands 5,000 acres or greater to assess naturalness, opportunities for solitude or primitive recreation, and supplemental values such as wildlife, historic and cultural sites, and geologic features etc., in accordance with the with the most recent BLM wilderness guidelines.	1						DC-01			I		
S-0082-04	AP	WC									• Incorporate citizen wilderness inventories in the planning process.	1						Part of DC-02			I		
S-0082-05	FW	ME	SR	VC	WR						• Identify areas and waterways with wildlife or wildland values that are not fulfilling their potential because of noxious weeds, past commercial activities or ground disturbances that could be restored.	1						DC-03			I		
S-0082-06	FW	SD	WC								• Give special consideration to conserving land near existing wildlife refuges or protected areas, are in the Rocky Mountain Front Heritage Act, or provide critical wildlife habitat.	1						DC-04	Rocky Mountain Front Heritage Act		I		

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S-0086-02	ME										The BLM Must Manage the Lewistown Field Office for Multiple Use - Including Oil and Gas Development: The development of oil and gas resources from public lands is a highly important part of the BLM's responsibilities. See 43 USC§ 1702(1), which defines mineral exploration and development as a principal or major use of public lands. Under FLPMA, the BLM is required to manage the public lands on the basis of multiple use and sustained yield. While "multiple use management" may be a deceptively simple term, its objective is to strike a balance among the many competing uses to which land can be put, including, but not limited to, recreation, range, timber, minerals, watershed, wildlife and fish, along with natural scenic, scientific and historical values. We recognize the difficult task the BLM faces to manage public lands in the Lewistown Field Office for multiple use. Nevertheless, we encourage BLM to remember that oil and gas development is a fundamental part of the BLM's multiple use mandate and that it is vital for BLM to ensure that oil and gas development is not unreasonably limited in the RMP revision process.									1	See 43 USC§ 1702(1); FLPMA	O (2)		
S-0086-03	ME										Stipulations should be the least Restrictive Possible: When revising the Lewistown RMP, BLM must ensure that stipulations developed for oil and gas leasing are the least restrictive necessary to adequately protect other resource values. Congress passed the Energy Policy Act of 2005 and Section 363 of that Act required the Secretary of the Interior and the Secretary of Agriculture to enter into a Memorandum of Understanding regarding oil and gas leasing and to ensure that lease stipulations are applied consistently, coordinated between agencies, and "only as restrictive as necessary to protect the resources for which the stipulations are applied." The Memorandum of Understanding required by § 363 of the Energy Policy Act of 2005 was finalized in April of 2006 as BLM MOU W0300-2006-07. The stipulations for oil and gas leases within the revised Lewistown RMP must not be onerous or more restrictive than necessary and must be scientifically justified. This is particularly important since leases have not been issued in the planning area for three decades.	1										§ 363 of the Energy Policy Act of 2005 and BLM MOU W0300-2006-07	O (2)	
S-0086-04	AP	ME									The BLM Should Only Analyze Reasonable Alternatives: The National Environmental Policy Act of 1969 ("NEPA") requires an agency only to consider "reasonable alternatives." 40 C.F.R. § 1502.14 (2010). NEPA does not require agencies to analyze the environmental consequences of alternatives that are too remote, speculative, or impractical or ineffective. When developing alternatives for the Lewistown RMP and accompanying environmental impact statement (EIS), BLM must ensure that the alternatives analyzed are in keeping with the requirements of The Council on Environmental Quality (CEQ), which has described reasonable alternatives in its "Forty Most Asked Questions" as "those that are practical or feasible from the technical and economic standpoint and using common sense, rather than simply desirable." Clearly, BLM must avoid analyzing speculative, impractical, or uneconomic alternatives. Specifically, overly stringent restrictions or conditions of approval (COA) that may render development uneconomic must also not be analyzed. Further, given the fact the public lands must be managed for multiple uses, including oil and gas development, alternatives that prohibit or eliminate all oil and gas development within the area are neither practical nor reasonable and need not be studied in detail by the agency.	1										National Environmental Policy Act of 1969; 40 C.F.R. § 1502.14 (2010)	O (2)	
S-0086-05	ME										The RMP Revision Process Should Not Impact Ongoing Operations, Development on Existing leases, or Pending Development Projects: Oil and gas development activities must not be prohibited during the planning process. The notion that the BLM may suspend all management decisions while a RMP is being revised has been rejected by numerous federal courts and the ISLA. Neither FLPMA nor the applicable regulations require BLM to institute a moratorium on activities pending completion of an EIS for an updated or revised RMP. Instruction Memorandum 2001-191 directs that "Actions that may appear to reduce a lessee's right to reasonably develop a lease should be cleared through the State Director and Regional Solicitor's Office ... When an RMP is being amended or revised, BLM will continue to process site-specific permits, sundry notices, and related authorizations on existing leases in an expeditious manner while ensuring compliance with NEPA and other laws, regulations, and policies." Consequently, BLM must not limit or restrict oil and gas development during the amendment process.									1		Instruction Memorandum 2001-191	O (2)	
S-0086-06	AA	ME									The BLM Does Not Have the Authority to Regulate Air Emissions in Montana: We recognize that BLM intends to will summarize all relevant background air quality and climate information associated with the planning area and identify all potentially affected Class I areas as well as actions that could be taken to protect these areas during the RMP revision process. We also understand that BLM will identify area-wide criteria or restrictions that would be applied to any activity authorized by the field offices to ensure compliance with all local, state, federal, or tribal air quality standards and implementation plans... We also understand that BLM will comply with procedures in the Memorandum of Understanding among the U.S. Department of Agriculture, U.S. Department of the Interior and U.S. Environmental Protection Agency, regarding air quality analysis and mitigation for federal oil and gas decisions through the NEPA process which was signed on July 23, 2011. Nevertheless, we remind BLM that it does not have direct authority over air quality or air emissions under the Clean Air Act ("CAA"). 42 U.S.C. §§ 7401 et seq. Under the express terms of the CAA, the Environmental Protection Agency (EPA) has the authority to regulate air emissions. In Montana, the EPA has delegated its authority to the Montana Department of Environmental Quality (MDEQ). The Interior Board of Land Appeals (IBLA) has equivocally determined that the State and not the BLM, has authority over air emissions. Specifically, IBLA found that ensuring compliance with Federal and State air quality standards, setting maximum allowable limits (NAAQS and WAAQS) for six criteria pollutants CO (carbon monoxide), SO2 (sulfur dioxide), NO2, ozone and particulate matter (PM10 and PM2.5), and setting maximum allowable increases (PSD Increments) above legal baseline concentrations for three of these pollutants (SO2, NO2, and PM10) in Class I and Class II areas is the sole responsibility of the State through MDEQ with oversight from EPA.	1										Memorandum of Understanding among the U.S. Department of Agriculture, U.S. Department of the Interior and U.S. Environmental Protection Agency signed on July 23, 2011; Clean Air Act ("CAA"). 42 U.S.C. §§ 7401 et seq.	O (2)	

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S-0086-07	AA	ME									<p>With respect to potential visibility impacts, the BLM's authority is also limited by existing federal law. Under the CAA, a federal land manager's authority is strictly limited to considering whether a "proposed major emitting facility will have an adverse impact" on visibility within designated Class I areas. 42 USC § 7475(d)(2)(B) (2010). Oil and gas operations do not meet the definition of a major emitting facility. Further, under the CAA, the regulation of potential impacts to visibility and authority over air quality in general, rests with the MDEQ. 42 USC § 7407(a) (2010). The goal of preventing impairment of visibility in Class I areas will be achieved through the regional haze State Implementation Plans (SIPs) that are being developed. Although federal land managers with jurisdiction over Class I areas may participate in the development of regional haze SIPs, BLM has no such jurisdiction in Montana. Accordingly, BLM has no authority over air quality and cannot impose emissions restrictions, either directly or indirectly, on oil and gas operations in Montana, particularly if the overall goal is to reduce potential visibility impacts. Rather than attempting to regulate air quality in the Lewistown RMP, we encourage BLM to participate in and abide by the regulatory processes currently underway in Montana. Any attempt by the BLM to regulate air quality could lead to inconsistent, confusing, and possibly illegal standards.</p>	1								42 USC § 7475(d)(2)(B) (2010); MDEQ. 42 USC § 7407(a) (2010)	O (2)	
S-0086-08	FW	ME									<p>Special Status Species: BLM states under its Preliminary Planning Considerations, "conservation measures described in the Greater Sage Grouse RMP amendment EA will be incorporated upon completion." As explained in our comments on the GRSg amendment EA (attached), the management strategies outlined in the EA far exceed what is needed to ensure sufficient regulatory mechanisms will exist in the future. Of primary concern is that implementation of the EA's Preferred Alternative would severely inhibit BLM's statutory mission and seriously compromise land users' ability to continue historic uses of public lands. While we supported the Lewistown FO's intention to maintain site-specific flexibility when utilizing the RDFs outlined in Appendix D of the EA, we remain concerned and object that many of these requirements are overly prescriptive, have no scientific basis and reflect a lack of understanding valid existing rights, operational considerations and technical feasibility. The primary reason for these excessive strategies is due to serious flaws in the data relied upon in the planning documents, which were discussed in detail in our comments on the EA.</p> <p>We reiterate that neither NEPA nor the Endangered Species Act (ESA) amend or alter the agency's statutory mission of multiple-use. Nor can this plan revision impact valid existing rights. Any process established for managing GRSg habitat must not conflict with BLM's duties and authorities under FLPMA and the Mineral Leasing Act.</p>	1								Refer to comments on the GRSg amendment EA (attached to comment letter).	O (2)	
S-0086-09	FW	ME									<p>In addition, we recommend that for other species, BLM ensure its management objectives and methods are consistent with those of the US Fish and Wildlife Service (USFWS). Specifically, management for species not listed as threatened or endangered must not exceed that which is recommended by the Service. An example would be the Mountain Plover. In May 2011, the USFWS determined that listing the mountain plover under the ESA was not warranted, estimating that "the current mountain plover breeding population to be over 20,000 birds, more than double the estimate cited in [its] 2002 proposal."¹ In addition, the Service concluded that "despite the prevalence of energy development activities throughout the range of the mountain plover, there is little evidence as to whether, or to what extent, the overall effects of energy development are detrimental to mountain plover (Andres and Stone 2009, p. 25). Although oil and gas field development modifies and fragments nesting, brood rearing, and foraging habitats, mountain plover continue to use these areas (Smith and Keinath 2004, p. 36; Carr-, in review)" 76 FR 27782. As such, prohibiting fluid mineral leasing or adding NSO stipulations in the planning area to protect the plover would fail to correspond with the FWS' listing determination for the species and would not be justified through any peer-reviewed science since that decision was made. Any NSO stipulations proposed for oil and gas leasing in areas within habitat of unlisted species would be arbitrary and capricious.</p>	1								"Mountain Plover Factsheet." U.S. Fish & Wildlife Service. Last updated: August 2011. Available at: http://www.fws.gov/mountain-prairie/species/birds/mountainplover/ ; Andres and Stone 2009, p. 25; Smith and Keinath 2004, p. 36; Carr-, in review; 76 FR 27782	O (2)	

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S-0086-10	ME										Valid Existing Rights: It is unclear why BLM failed to identify the recognition and protection of valid existing rights as an issue in the preparation plan for the revision of the Lewistown RMP. When revising the RMP, the BLM must also acknowledge existing rights, including oil and gas lease rights. Once the BLM has issued a federal oil and gas lease without no surface occupancy stipulations, and in the absence of a nondiscretionary statutory prohibition against development, the BLM cannot completely deny development on the leasehold. Only Congress has the right to completely prohibit development once a lease has been issued. Congress made it clear when it enacted FLPMA that nothing in the act, or in the subsequently developed land use plans, was intended to terminate, modify, or alter any valid or existing property rights. In adherence to this purpose, BLM promulgated policies regarding the contractual rights granted in an oil and gas lease. BLM Instruction Memorandum 92-67 states that "the lease contract conveys certain rights which must be honored through its term, regardless of the age of the lease, a change in surface management conditions, or the availability of new data or information. The contract was validly entered based upon the environmental standards and information current at the time of the lease issuance." As noted in the BLM's Instruction Memorandum, the lease constitutes a contract between the federal government and the lessee which cannot be unilaterally altered or modified by the BLM. In the revised Lewistown RMP and accompanying EIS, we advise that BLM emphasize that an oil and gas lease is a contract between the federal government and the lessee, and that the lessee has specific rights. BLM recently recognized the nature of existing oil and gas lease rights in the Pinedale RMP issued in November of 2008. "Existing oil and gas or other mineral lease rights will be honored. When an oil and gas lease is issued, it constitutes a valid existing right; BLM cannot unilaterally change the terms and conditions of the lease ... Surface use and timing restrictions from this RMP cannot be applied to existing leases." Pinedale RMP, 2-19. Similar language exists in the December 2008 Rawlins RMP, pg. 20. We encourage the Lewistown BLM to include similar language in its RMP.	1										BLM Instruction Memorandum 92-67; November 2008 Pinedale RMP, 2-19; December 2008 Rawlins RMP, pg. 20	O (2)	
S-0086-11	ME	SE									Socio-Economic Analysis: BLM is required under 43 CFR § 1610.4-4 (g) to analyze the level of dependence of local communities on resources from public lands during land use planning. As such, the BLM Land Use Planning Handbook (H-1601-H) and Instruction Memorandum No. 2002-167 each address social and economic analysis for land use planning. Factors required to be analyzed include: demographic, economic, social and fiscal conditions and land use patterns. In addition, existing conditions and trends, as well as the impacts to conditions and trends associated with each alternative must be assessed along with the income and employment associated with all economic sectors, community infrastructure, state and local revenues and expenditures, and land use patterns. Further, NEPA requires analysis of socio-economic impacts in order to ensure that agency decisions do not result in a financial burden upon the communities which rely on public lands for their livelihoods and revenue. It is crucial for the Lewistown economic impact analysis to directly recognize that the economic benefits to local communities and the State of Montana from oil and gas development will decrease proportionately due to the limitations imposed on future oil and gas development by BLM.	1									43 CFR § 1610.4-4 (g); BLM Land Use Planning Handbook (H-1601-H); Instruction Memorandum No. 2002-167	O (2)		
S-0087-01	AP	TI									Under Article 4 of the Treaty with the Eastern Band Shoshoni and Bannock of 1868 (15 Stat. 673), the Tribes "have the right to hunt on the unoccupied lands of the United States so long as game may be found thereon, and so long as peace subsists among the whites and Indians on the borders of the hunting districts". Therefore, the most important thing that BLM can do is to acknowledge in the Executive Summary and Introduction of the RMP/EIS that management is consistent with the Treaty Rights retained by the Shoshone-Bannock Tribes.				1							T		
S-0087-02	LG	LR	SR	TI	VC						In general, the Tribes does not support fencing, surface disturbing activities, development of building and structures (e.g., water development projects, power lines, etc.), and agriculture on public lands.				1						T			
S-0087-03	FW	TI	VC								The Tribes does support vast open space and landscapes that support abundant populations of native fish, wildlife, and plant species.				1						T			
S-0087-04	AP	FW	TI	VC							we would like the BLM to establish goals and objectives for: 1) government to government consultation with the Tribes, 2) ensuring management actions are consistent with Treaty Rights retained by the Tribes, and 3) how to maintain or increase open space and actions that promote high quality habitat for native fish, wildlife, and plant communities.	1									T			
S-0087-05	FW	LG	TI								We would also like the BLM to develop goals and objectives that allow buffalo expansion and population recovery of sage grouse and other special status species on public lands within the planning area.					1					T			
S-0087-06	AA	FW	ME	TI							We are also greatly concerned with the impacts of climate change and how federal land management actions may be contributing to climate change. Not only does the development of solid minerals, fluid minerals, and energy fragmentation and reduce habitat for wildlife, fish, and native plants, this type of development can contribute to climate change. For example, native plant communities are known to sequester carbon and ameliorate climate. Surface disturbance and occupancy reduces the ability of native plant communities to provide climate regulating ecosystem services. Emissions that result for fluid minerals contributes directly to climate change through increased radiant forcing. Although, these types of actions may seem limited to the region the effects of climate change impact the globe. Therefore, we do not support actions posed by the BLM that contribute to positive radiant forcing. We do support actions that help mitigate the effects of climate change. For example, establishing management actions and objectives to promote climate regulating ecosystem services and maintenance and enhancement of large landscapes dominated by native vegetation. To better help you understand our position on climate change we have attached our Climate Change Policy.	1									See Shoshone-Bannock Tribes' Climate Change Policy Statement (attached to comment letter).	T		

APPENDIX E. LEWISTOWN RMP SCOPING COMMENT MATRIX

8/29/2014

COMMENT/ SEQUENTIAL NUMBERS	PLANNING ISSUE CATEGORIES										COMMENT	COMMENT WILL BE ADDRESSED IN RMP	COMMENT PRESENTS A NEW ISSUE & WILL BE ADDRESSED IN RMP	COMMENT FURTHER REFINES AN EXISTING ISSUE & WILL BE ADDRESSED IN RMP	COMMENT WILL NOT BE ADDRESSED	COMMENT IS BEYOND SCOPE OF RMP	BETTER ADDRESSED ADMINISTRATIV ELY OR AT A LOWER LEVEL OF PLANNING	DUPLICATE COMMENT (DC)	REFERENCE ONLY	DATA SOURCES AND/OR ADDITIONAL INFORMATION AND/OR PLANNING CRITERIA	CATEGORY (B = Business; CY = County; I= Ind.; F = Federal; O = NGO; ST - State; T =	FORM LETTER (FL)
S-0087-07	LR	TI									We also want to inform you of our policy on land tenure adjustments. The Tribes opposes any federal land disposition, sale, or transfer to private entities or state and local governments based upon two fundamental reasons. First, the United States government entered into a solemn treaty with the Shoshone and Bannock tribal peoples in which the Tribes reserved certain off-reservation hunting, fishing, and gathering rights which we continue to exercise on unoccupied lands of the United States. Secondly, the United States, including its federal agencies, have a trust responsibility as established in the Fort Bridger Treaty and other federal laws, policies and executive orders to protect and preserve the rights of Indian tribes, and to consult with the Tribes prior to such land sales or transfers. To better understand our position we have attached our position statement regarding the transfer of federal lands.	1								See The Shoshone-Bannock Tribes' Position Regarding the Transfer of Federal Lands (attached to comment letter).	T	
S-0087-08	RV	TI									Traditionally, the Shoshone and Bannock peoples were nomadic and migrated throughout the region to sustain their livelihoods. There was no understanding of "permanent settlement" until the United States forced our people to the Fort Hall Reservation. Tribal elders have indicated that when Tribal members went to pursue subsistence there was no boundaries and would freely take subsistence as the need arose. However, federal land managers have since developed campground reservation systems, lotteries and fees limiting Tribal members' access to traditional subsistence opportunities and reduce access when exercising off-reservation rights to hunt, fish, and gather on unoccupied lands. As the Tribes exercises inherent and reserved treaty rights within their own authorities and responsibilities, federal land developed campground fees, access points, reservation systems, and any other fee-based campground services shall not apply to the enrolled members of the Shoshone-Bannock Tribes. This is in accordance with Article IV of the Fort Bridger Treaty, which does not state, nor was it the intent of our leaders at the time of signing, to impose or restrict Tribal members from exercising off-reservations rights. Again, we have attached our positions statement on camping on federal lands.	1							See Shoshone-Bannock Tribes' Position Statement Regarding Developed Campgrounds on Federal Lands (attached to comment letter).	T		
												323	6	52	15	66	34		30			

APPENDIX F

PRELIMINARY PLANNING ISSUES AND MANAGEMENT CONCERNS

PLANNING ISSUES:

Issue: Vegetation Management

Past and current management activities, such as timber harvest, road construction, mining, recreation, and/or effects of activities on surrounding private lands, continue to affect the natural function and condition of riparian areas, upland vegetation communities, and forested areas. Riparian and wetland habitats, including streams, springs, seeps, and meadow areas, are of critical importance to fish and wildlife species. Healthy riparian, upland, and forest communities have good species diversity and structural integrity, and are resilient following natural disturbances such as fire. They provide fish and wildlife habitat, soil stabilization, increased infiltration of precipitation, watershed protection, and enhance recreation and aesthetic values. The Bureau of Land Management (BLM) *Standards for Rangeland Health and Guidelines for Livestock Grazing Management for Montana, North Dakota and South Dakota* (Record of Decision [ROD], August 1997) identified and incorporated five specific standards into the process for evaluating rangeland health. These standards include upland health, riparian health, water quality, air quality, and habitat (biodiversity). The ROD relating to rangeland health and the subsequent standards will be incorporated into the Lewistown Rangeland Management Plan (RMP).

Planning Questions

- How will BLM lands be managed to achieve, maintain, or improve riparian, upland, and forest communities, with an emphasis on native species restoration?
- What rangeland, forest, woodland, wetland, and riparian plant communities currently exist on the landscape, in what amounts, and what are the desired plant communities?
- Which plant communities would be targeted for restoration activities and where are they located?
- Which plant communities would be most affected by climate change, drought, and fire?

Preliminary Planning Considerations

- Comply with Executive Order 11990 for wetlands preservation.
- Maintain, improve, and restore natural functions to benefit water storage, groundwater recharge, water quality, and fish and wildlife values.
- Design best management practices (BMPs) to maintain or improve resource integrity.
- Provide for the protection and restoration of native species.
- Provide for multiple use and sustained yield of forage for wildlife and domestic livestock.
- Coordinate with Montana Fish, Wildlife and Parks (MFWP) to assure that wildlife habitat is sustained.
- Incorporate Montana Standards for Rangeland Health and Guidelines for Livestock Grazing Management.

Issue: Noxious Weeds and Invasive Species Management

Noxious weeds and other invasive plant species can affect native plants, special status species, wildlife and livestock forage, water quality, and fire management. The BLM is responsible for controlling noxious weeds on public lands and coordinating with state, county, and private landowners to reduce the establishment of undesirable plant species by implementing integrated weed management. Areas of noxious weed infestation and invasive plants are being mapped and will be used in development of the RMP. The RMP will incorporate policies and strategies detailed in the *Programmatic Environmental Impact Statement Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States* (Final Programmatic Environmental Impact Statement [EIS], 2007). The RMP will also address additional practices or preventative measures to be applied to all resource activities and uses, such as the use of certified weed-free seed mixtures, feeds, and mulches for reclamation and restoration practices. The incorporation of the use of weed-free forage and the emphasis of restoration of disturbed areas, including specific seed mixes, will be included in all alternatives.

Planning Questions

- What actions and/or restrictions will be needed to maintain or improve natural resource values that have been affected by, or are susceptible to, noxious weeds and other undesirable plant species?
- Which plant communities are being degraded because of noxious weed or invasive species, and where are they located?
- Which noxious weed and invasive species would receive highest priority for control, and where are they located?
- Where in the planning area would be the highest priority for noxious weed and invasive species control?

Preliminary Planning Considerations

- Utilize the weed management guidelines and design features identified in the 2007 *Programmatic Environmental Impact Statement Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States*.
- Protect nontarget and special status plant species during treatments.
- Incorporate Montana Standards for Rangeland Health and Guidelines for Livestock Grazing Management.
- Consider Integrated Weed Management Strategies for more effective control and eradication of undesirable plant species.
- Comply with Executive Order 13112, Invasive Species (February 1999).
- Incorporate the *Partners Against Weeds Strategy Plan* (PAWS).

Issue: Fish and Wildlife Habitat

The planning area contains a diversity of important habitats for a variety of fish and wildlife species. Habitat quality has been modified as a result of roads, timber harvest, wildfire, fire suppression, recreation, and grazing. Where public lands ownership patterns are highly fragmented, protection and/or improvement of fish and wildlife habitats is more challenging. The key to maintaining quality wildlife habitats is large blocks of diverse, healthy vegetation and plant communities. Fish habitats also require high water quality and good stream channel and riparian conditions.

Planning Questions

- How will uses and activities be managed to maintain and/or improve fish and wildlife habitats?
- What are the priority game and nongame species found in the planning area, how are they distributed, and what are their habitat requirements?
- Which native plant communities provide habitat to priority game and nongame wildlife and how are they distributed in the landscape?

Preliminary Planning Considerations

- Protect and restore fisheries habitat.
- Protect native vegetative communities.
- Protect and preserve genetic integrity.
- Protect and maintain the intrinsic and recreational values associated with native and desirable nonnative species.
- Identify habitat conditions and needs in cooperation with MFWP, Montana Department of Environmental Quality (DEQ), and other land management agencies, including US Forest Service (FS), U.S. Fish and Wildlife Service (FWS), Montana Department of Natural Resources (DNRC), and the Blackfeet Indian Reservation.
- Coordinate with MFWP to ensure that wildlife populations are compatible with land health objectives.
- Protect important big game and upland game bird habitats.
- Protect habitats for migratory birds.
- Improve access to public lands that help meet state wildlife population objectives.

Issue: Special Status Species

Special status species include plant, fish, and animal species designated as Endangered, Threatened, or Proposed under the Endangered Species Act (ESA), or as BLM sensitive species, including Greater Sage-grouse. The planning area supports habitat for a number of federally-listed and BLM sensitive species. Habitats for special status species are affected by roads, timber sales, wildfire, grazing, recreation, and habitat fragmentation.

Planning Questions

- How will BLM manage uses and activities to ensure that activities affecting special status species are carried out in a way that is consistent with objectives for managing those species and their habitats at the appropriate spatial scale?
- What are the special status species within the planning area, and what are their distribution, abundance, population condition, current threats, and habitat requirements?
- How will species populations be inventoried and monitored?

Preliminary Planning Considerations

- Follow applicable conservation agreements, strategy plans, and recovery plans.
- Ensure that management actions protect BLM and State sensitive species and do not contribute to a trend toward federal listing, or cause a loss of viability to populations or species.
- Ensure that management actions do not jeopardize the continued existence of federally-listed Threatened or Endangered species, or result in the destruction or modification of critical

habitat.

- Incorporate Montana Standards for Rangeland Health and Guidelines for Livestock Grazing Management.
- Incorporate planning criteria outlined in the Special Status Species Management Manual 6840.
- Conservation measures described in the Greater Sage-grouse RMP Amendment and EIS will be incorporated upon completion.

Issue: Recreation and Visitor Services

Public lands provide for a wide array of recreation opportunities within varied settings. Outdoor recreation use levels in both developed and undeveloped recreation settings are increasing. Increased use creates an elevated demand for facilities, user information, and access. The RMP should assist the BLM in providing access to the public lands and to ensure quality, environmentally-responsible outdoor recreational opportunities, experiences, and benefits for the growing number of public land users.

Planning Questions

- How will resources be managed to enhance recreation experiences and quality of life?
- How will management of public lands affect the social and economic conditions of local economies?

Preliminary Planning Considerations

- Provide for and enhance recreation opportunities to accommodate use and reduce effects to other resources.
- Incorporate appropriate guidance from *BLM's Priorities for Recreation and Visitor Services: BLM Workplan Fiscal Years 2003-2007*.
- Identify and map special recreation management areas (SRMAs) and extensive recreation management areas (ERMAs).
- Consider those lands identified as SRMAs and ERMAs, and those areas subject to special measures to protect resources or reduce land use conflicts.
- Ensure that existing recreation facilities can be properly maintained prior to construction of new facilities.

Issue: Travel Management and Access

Many tracts of public land, large and small, within the planning area have no legal access for the public. Population growth, rural and urban development, and increasing recreational activity have resulted in an increased need for access to public lands. If landowners are willing and funding is available, the BLM can negotiate and purchase easements for public access.

The Department of the Interior's Strategic Plan calls for ensuring environmentally sound public access to recreation sites on public lands. The goal of improving access to appropriate recreation opportunities is also one of the BLM's top priorities.

Motorized travel and transportation (all-terrain vehicle [ATV] and off-highway vehicle [OHV]) use has grown in popularity in some areas. The BLM has prepared new manual guidance for Trails and Travel Management as well as the development of several strategies (i.e., the *National Management Strategy for Motorized Off-Highway Vehicle Use on Public Lands* and *National Mountain Bicycling Strategic Action*

Plan) for improving the way the road and trail systems are managed on public lands. These strategies provide a foundation for the development of a comprehensive travel management program.

Planning Question

- How will transportation and public access be managed to improve access, protect resources, reduce conflicts of use, and provide motorized and nonmotorized recreation opportunities for public land visitors?

Preliminary Planning Considerations

- Comply with Section 205 of FLPMA.
- Evaluate the type of, and need for, existing or proposed facilities.
- Evaluate conflicts with existing or potential resource values and uses.
- Consider cost benefits and the duration and assurance of title.
- Comply with Executive Orders 11644 and 11989 (provide for public safety; minimize damage to soil, watershed, vegetation, and other public land resources; minimize harassment of wildlife or significant disruption of wildlife habitats; and minimize conflicts between OHV use and other existing or proposed recreational uses).
- Ensure compatibility of area OHV designations with designations and conditions on neighboring federal, state, county, and municipal subdivisions, taking into account safety, noise, and other related factors.
- Incorporate appropriate guidance in *BLM's Priorities for Recreation and Visitor Services: BLM Workplan Fiscal Years 2003-2007*.
- Incorporate appropriate guidance from the *BLM National Management Strategy for Motorized Off-Highway Vehicle Use on Public Lands*.
- Incorporate appropriate guidance from the *BLM National Mountain Bicycling Strategic Action Plan*.
- Incorporate appropriate guidance from the *BLM Handbook for Trails and Travel Management*.

Issue: Forest Management

The planning area includes forest lands that provide wildlife habitat, watershed protection, recreational and aesthetic values, and forest products. Fire suppression and harvest activities of the past century, prolonged periods of drought, and historical harvesting methods have changed the pre-settlement character of tree species composition and stand densities. This has led to an increased fire risk in these areas and led to altered disturbance processes, including insects and fire in many areas. Studies of timber vegetation type and structure and timber stand plots will be used to determine existing age, structure, and composition of forest/woodland areas so that desired outcomes can be identified per the H-1601-1 Land Use Planning Handbook.

Planning Questions

- How will healthy forest ecosystems be maintained or restored?
- Where, and at what harvest levels will BLM provide for forest products?
- How should the BLM address demands for "other" or "special" forest products, including commercially collecting native seeds and conservation seed collections?
- How will areas impacted by Mountain pine beetle be managed to salvage resources and limit fire danger?

- How will management of BLM lands affect the social and economic conditions of local economies?

Preliminary Planning Considerations

- Consider desired composition; access; public demand for forest products; effects of drought, insects, and disease; and wildlife habitat.
- Use Inventory of Timber Production and Capability Classifications (TPCC); 1974 and 1992 Forest Inventories.
- Follow *The President's Healthy Forests Initiative* (August 2002) and *National Fire Plan* (2000)

Issue: Wildland Urban Interface

The planning area includes areas of expanding wildland urban interface. Within these areas, we will address opportunities to: (1) identify broad treatment levels; (2) identify general restrictions on fire management practices (suppression and fuels management), if any are needed, to protect other resource values; and (3) restore fire-adapted ecosystems. The RMP will also address emergency stabilization and rehabilitation activities on landscapes and communities affected by wildland fire through the use of community wildfire protection plans (CWPPs), as prescribed by requirements of the Healthy Forest Restoration Act and local fire management plans (FMP).

Planning Questions

- Where and what types of fuel management activities can be used to reduce fuel accumulations in the wildland urban interface, and promote and sustain a healthy ecosystem?
- How will management of BLM lands affect the social and economic resiliency and sustainability of local economies?

Preliminary Planning Considerations

- Emphasize fuel reduction projects on public lands within priority areas identified by the communities.
- Coordinate closely with communities and other adjacent owners to ensure maximum effectiveness from joint fuel reduction activities.
- Where possible, use local contractors, equipment, and services to maximize the economic benefit to the community.
- Incorporate guidance and direction defined in the *Federal Fire Policy*, the *National Fire Plan*, and associated policies and guidelines, including multi-agency collaboration for fire, fuels management, and budgeting, and the *Fire/Fuels Management Environmental Assessment Plan Amendment for Montana and the Dakotas* (2003).

Issue: Fire Management

Vegetation fuel types in the Lewistown planning area can be described as grass, shrub, and timber. Central Montana typically burned with mixed severity fires and a fire return interval of 5 to 30 years (longer in the higher elevation forest types). The past 100 years of successful fire exclusion, advancement of succession in forest ecosystems, and extended fire return intervals in short-grass prairie and shrublands have resulted in increased fuel loadings. When added to the significant outbreaks of insects and disease in forested areas, and increasing nonnative plants in the grasslands, the result is

higher potentials for increased fire size, frequency, intensity, and severity. The influx of people to the area will increase the probability of human-caused fires.

Planning Questions

- What should be the landscape-level fire management goals and objectives?
- Where can fuel management activities be used to reduce fuel accumulations, and promote and sustain a healthy ecosystem?
- How can fire suppression actions be managed to minimize the adverse effects to public health and safety, private property, and resources while providing for beneficial ecological processes?
- What is the appropriate management response to naturally occurring wildfire outside the wildland urban interface?

Preliminary Planning Considerations

- Follow *National Fire Plan, 2000*.
- Follow *Federal Wildland Fire Management: Policy and Program Review, 1995*, reaffirmed and updated, 2000.
- Follow BLM Manual 9214.
- Follow *Interagency Standards for Fire and Aviation Operations*.
- Incorporate guidance and direction defined in the Fire Planning Manual (MS-9211) and Fire Planning Handbook (H-9211-1).

Issue: Livestock Grazing

Livestock grazing in the Lewistown RMP planning area occurs within numerous intermingled allotments containing BLM and other federal lands, and private, state, and grazing district lands. Percentages of BLM public lands within these allotments range from less than 10 percent to 100 percent of an overall allotment area. The Lewistown Field Office (LFO) currently authorizes grazing on 590 grazing allotments. There are approximately 66 unallocated parcels. The Butte Field Office (BFO) administers grazing on approximately 14 allotments within this planning area. Allocations and adjustments will be evaluated within alternatives, as described in Washington Office (WO) Instruction Memorandum (IM) No. 2012-169, taking into consideration other resource values and forage demands within the planning area. Unallocated parcels will be evaluated for suitability of livestock grazing. Criteria for issuing grazing permits/leases or identifying parcels to remain unleased will be developed and incorporated into the Lewistown RMP.

The need to improve range condition; range management options when forage resources are affected by drought, insects, or fire; the need to maintain and improve wildlife habitat through the modification of livestock grazing (permitted use and season of use); recreational uses; and the need to maintain the economic stability of the local livestock industry will be considered in the plan. In addition, the Lewistown RMP will address concerns regarding rangeland health, selective management categories for individual allotments, and maintenance of social and economic factors in affected communities within the planning area.

Planning Question

- What lands will be available or not available for livestock grazing, and how will livestock grazing be managed?

Preliminary Planning Considerations

- Conform with existing laws, regulations, and BLM policy pertaining to livestock grazing on public lands.
- Incorporate Montana Standards for Rangeland Health and Guidelines for Livestock Grazing Management.
- Consider ecological site inventory information.
- Protect important biological resource functions that provide for soil stability, water quality, and healthy riparian and upland vegetation communities.
- Provide for the protection and restoration of native species and potential natural communities.
- Authorize use to minimize environmental impacts under the principles of multiple use and sustained yield.

Issue: Land Tenure Adjustments

The workload and cost to manage small tracts of public lands within the planning area are high because of the scattered land ownership pattern. Many parcels of public land are less than 640 acres in size, have no legal access, and contain limited management opportunities. Land tenure adjustments, through purchase, exchange, and donation, have the potential to provide greater efficiencies in management, reduced workload, and reduced costs. Land tenure adjustments also allow for the acquisition of parcels with high public resource values.

Planning Question

- What opportunities exist to make adjustments to public land ownership that would result in greater management efficiency and increased public and natural resource benefits?

Preliminary Planning Considerations

- Comply with Federal Land Exchange Facilitation Act of 1988.
- Comply with Sections 203 and 206 of the Federal Land Policy and Management Act of 1976 (FLPMA).
- Improve public access opportunities to public lands and resources.
- Improve administrative access opportunities to public lands and resources.
- Maintain or enhance important resource values and uses.
- Maintain or enhance local social and economic values.
- Improve management efficiency and expand management opportunities through the elimination of isolated tracts and creation of “blocks” of public lands.
- Review, and where appropriate, continue identification of lands for disposal.

Issue: Delineation of Right-of-Way Corridors and Sites

The planning area contains a number of utility, transportation, and communication rights-of-way. The locations of some of these existing rights-of-way may or may not be suitable for expansion or development into utility corridors, communication sites, and/or wind energy sites. It is important to identify or delineate those corridors and sites in order to effectively manage the public lands and to minimize the impacts from the proliferation of separate rights-of-way.

Planning Questions

- What lands will be available for right-of-way corridors?
- What lands will be identified as right-of-way avoidance or exclusion areas based on resource values and requirements for right-of-way uses and commercial activities?

Preliminary Planning Considerations

- Public lands will generally be available for transportation, utility, and communication site rights-of-way, except: (1) where there is a need to protect other resource values; (2) areas specifically identified as avoidance and exclusion areas; or (3) where specifically prohibited by law or regulation.
- Comply with Section 503 of FLPMA.
- Incorporate the findings of the 1992 *Western Regional Corridor Study* by the Western Utility Group.
- Utilize existing/common rights-of-way to the extent possible, and minimize the proliferation of separate rights-of-way.
- Identify public lands with existing right-of-way corridors that may or may not be suitable for additional rights-of-way.
- Evaluate potential conflicts with existing or potential resource values and uses.
- Consider visual resource management (VRM) classifications.

Issue: Minerals and Energy Development

The planning area has the potential for the development of solid minerals, fluid minerals, and energy. Mineral and energy development can affect a variety of other resources, although these effects can be reduced through carefully developed mitigations such as reclamation, hazardous materials management, avoidance areas, the use of BMPs, and mineral withdrawals.

In addition to the mineral and energy development activities, there are concerns about abandoned mine lands and the hazard abatement associated with such activities. This ongoing process involves BLM and other federal and state agencies. The planning effort will identify or mention the following, consistent with the goals and objectives for natural resources within the planning area (see Planning Handbook, Appendix C, II, H):

- Areas open to leasing, subject to existing laws, regulations, and formal orders; and the terms and conditions of the standard lease form.
- Areas open to leasing, subject to moderate constraints such as seasonal and controlled surface use restrictions. These are areas where it has been determined that moderately restrictive lease stipulations may be required to mitigate impacts to other land uses or resource values.
- Areas open to leasing, subject to major constraints such as no surface occupancy stipulations on an area more than 40 acres in size or more than 0.25 mile in width. These are areas where it has been determined that highly restrictive lease stipulations are required to mitigate impacts to other lands or resource values. This category also includes areas where overlapping moderate constraints would severely limit development of fluid mineral resources.

- Areas closed to leasing. These are areas where it has been determined that other land uses or resource values cannot be adequately protected with even the most restrictive lease stipulations; appropriate protection can be ensured only by closing the lands to leasing. Identify whether such closures are discretionary or nondiscretionary, and if discretionary, provide the rationale.

The plan will identify, for each lease stipulation, the circumstances for granting an exception, waiver, or modification, as well as identify the general documentation requirements and any public notification associated with granting exceptions, waivers, or modifications.

The planning effort will clarify and determine whether the development decisions also apply to geophysical exploration, and whether constraints identified in the land use plan for new leases also apply to areas currently under lease.

In addition, the plan will identify resource condition objectives that have been established, specific lease stipulations and general/typical conditions of approval, and BMPs that will be employed to accomplish these objectives in areas open to leasing. In addition, long-term resource condition objectives will be identified for areas currently under development to guide reclamation activities prior to abandonment.

Planning Questions

- Under the principles of multiple use and sustained yield, how will mineral and energy development activities be managed to provide for products while preventing undue or unnecessary degradation to other natural resources?
- How will management of public lands affect the social and economic conditions established by mineral and energy development?
- How will management of subsurface minerals affect surface lands and resources?

Preliminary Planning Considerations

- Make public lands and federal minerals available for the exploration and development of energy and mineral resources while considering other resource values.
- Identify reasonable foreseeable development potential/scenarios, as appropriate.
- Identify BMPs, and mitigation and conservation measures that are necessary to minimize effects of development.
- Identify areas to be withdrawn or closed to protect nonmineral or energy resource values.

Issue: Special Designations

The planning unit contains a number of special designations such as the Square Butte Wilderness Study Area (WSA), Blacktail Creek Paleontological Site mineral withdrawal, outstanding natural areas (ONAs), areas of critical environmental concern (ACECs), the Lewis and Clark National Historic Trail (NHT), the Nez Perce NHT, and the Continental Divide National Scenic Trail (NST). These special designations provide management direction specifically designed to protect the resource values for which the area was designated. There may be resources that are best protected by additional designations, and there may be designations that are no longer necessary. In addition, the streams and rivers in the *Headwaters RMP* area have not been evaluated under the wild and scenic river guidelines.

Planning Questions

- Where are special designations appropriate to protect unique resource values?
- What other rivers in the planning area are suitable for wild and scenic river status?
- What are the nature and purposes of the Nez Perce NHT, the Lewis and Clark NHT, and the Continental Divide NST?
- What public land areas will be established as national trails corridors?
- What management practices will occur to manage national scenic and historic trails so as to safeguard the nature and purposes of the trails, and in a manner which protects the values for which they were designated?
- What allowable uses, management actions, and necessary restrictions should be established within the national trails corridors?
- How will other BLM programs and uses be managed within the national trails management corridors?
- Are there any national trails-related lands within the planning area that should be acquired?
- What level of coordination will occur to ensure the national trails corridors edgemark with adjoining BLM field offices and other agencies that administer these corridors?

Preliminary Planning Considerations

- Comply with FLPMA, Sections 201 and 202.
- Evaluate all rivers and streams in the planning area for eligibility under the Wild and Scenic Rivers Act. Complete a study recommending which eligible rivers are suitable for inclusion in the national wild and scenic river system, in accordance with BLM Manual 8351, Wild and Scenic River Policy.
- Comply with Interim Management Policy for Lands Under Wilderness Review, BLM Handbook 8550-1.
- Evaluate any new areas which may be suitable for designation as ACECs.
- Identify lands with wilderness characteristics.
- Comply with the National Trails System Act, in accordance with BLM Manual 6280, National Scenic and Historic Trail Policy.

MANAGEMENT CONCERNS

Management Concern: Air Quality

The RMP will summarize all relevant background air quality and climate information associated with the planning area and identify all potentially affected Class I areas as well as actions that could be taken to protect these areas. The plan will identify area-wide criteria or restrictions that would be applied to any activity authorized by the field offices to ensure compliance with all local, state, federal, or tribal air quality standards and implementation plans. Authorized activities include, but are not limited to, fuels management and energy development.

Preliminary Planning Considerations

- Comply with National Environmental Policy Act (NEPA) requirements to analyze and disclose impacts to air resources, including ambient air quality and air quality-related values.
- Comply with procedures in the memorandum of understanding (MOU) among the US

Department of Agriculture, US Department of the Interior, and US Environmental Protection Agency regarding air quality analysis and mitigation for federal oil and gas decisions through the NEPA process which was signed on July 23, 2011.

- Incorporate a strategy for addressing BLM requirements under general conformity (40 CFR Part 93, Subpart B).

Management Concern: Water Quality/Quantity

Standard procedures regarding permitting practices required by federal and Montana State laws will be identified in the RMP. The BLM will work closely with Montana DEQ, MFWP, plus tribal, federal, and local laws regarding water quality planning and management. Data to be examined will include, but are not limited to, the Montana DEQ's identified impaired streams (303(d)), Montana's Streamside Management Zone Law, riparian condition, water rights, land jurisdiction, water quality, and water quantity data. The Lewistown RMP will identify and consider: BMPs that the State of Montana and its cooperators (including the BLM and the USFS) have developed and distributed for use by federal land managers, including particular BMPs developed for watersheds as a result of the 303(d)/total maximum daily load (TMDL) process; Standards for Rangeland Health assessments; BMPs for grazing; and existing MOUs with the State of Montana.

Management Concern: Soil Resources

Soils will be managed to maintain or improve soil health and productivity and minimize impacts to soil resources through the actions of management activities. Best management practices, mitigation measures, and reclamation will be implemented at the site-specific activity/project level to prevent or reduce soil erosion, compaction, and return soil productivity; especially, for soils with severe erosion susceptibility, sparse vegetation, shallow depths, and on steep slopes. If soil impacts cannot be mitigated or effectively controlled, then the activity/project could be relocated or denied.

The RMP will utilize available soil data to make informed decisions for a variety of resources and resource uses. State Soil Geographical Data (STATSGO) and Soil Survey Geographical Data (SSURGO) are available for all counties in the planning area.

Management Concern: Cultural Resources

The planning area contains many significant prehistoric, historic, and cultural areas. Recreational activities, unintentional trespass, theft, erosion, and vandalism are all sources of cultural resource degradation. Protection of cultural resource sites may include identification, evaluation, monitoring, stabilization, and interpretation.

Planning Questions

- How will cultural resources needing proactive management, protection, and use be identified?
- How will sacred sites and traditional cultural places that need protection be identified?

Preliminary Planning Considerations

- Consult with tribal governments and State Historic Preservation Office (SHPO).
- Identify and protect cultural resources and traditional cultural properties.
- Protect, preserve, and enhance sites eligible or listed on the National Register of Historic Places.

Management Concern: Tribal Treaty Rights and Trust Responsibilities

Sacred sites, cultural landscapes, traditional cultural use areas, and other trust resources within the planning unit require inventory, consultation, and protection to meet our trust responsibilities. Treaties ratified by the US Congress and federally-recognized tribes confer special legal rights to use public land. Effective consultation and coordination is the key to achieving management goals for both the tribes and the BLM.

Planning Questions

- Are potential effects to trust resources and treaty rights adequately addressed?
- What plants and animals in the planning area are typically used for traditional and/or treaty use purposes?
- How are sacred sites, cultural landscapes, and traditional cultural uses identified and protected?

Preliminary Planning Considerations

- Consult with tribal governments.
- Identify and manage trust resources.
- Comply with treaty rights for all associated management activities and uses.

Management Concern: Tribal Interests

Under all alternatives, BLM would continue to notify and consult with appropriate American Indian tribes on BLM-authorized actions. Consultation and coordination would be conducted on a government-to-government basis with federally-recognized tribes. Management of public lands would accommodate the exercise of rights provided by treaties or law that are applicable to the planning area. The BLM would coordinate with the appropriate entities within tribal government on issues under its jurisdiction to determine appropriate protocols that provide for treaty uses of public lands.

Planning Questions

- Who are the tribes likely to be affected? What is their recent history and likely area of interest?
- What (if any) landscape-scale issues should be identified and addressed at the land-use planning stage?
- Are there any historic and/or religious concerns that will need to be appropriately addressed under Section 106 of the National Historic Preservation Act (NHPA)?
- What are other resource concerns that would be of interest (water, vegetation, etc.)?
- Are there likely to be environmental justice issues?
- Will climate change impacts and adaptation be an issue of concern for tribes?
- Does the tribe have a Tribal Historic Preservation Officer (THPO)?
- What plants and animals in the planning area are typically used for traditional and/or treaty use purposes?
- How are sacred sites, cultural landscapes, and traditional cultural uses identified and protected?

Preliminary Planning Considerations

- Consult with tribal governments.

- Identify and collect information to adequately address planning issues and questions.

Management Concern: Paleontological and Cave and Karst Resources

The planning area contains documented paleontological localities, as well as the potential for other cave and paleontological resources throughout the field office. These resources are only beginning to be understood and identified. Recreational activities, natural erosion, unintentional trespass, theft, and vandalism are all sources of resource degradation. Protection and management of these sites and caves includes identification, stabilization, and enhancement to maintain significant scientific, educational, and recreational values.

Planning Question

- How will the BLM manage paleontological and cave resources?

Preliminary Planning Considerations

- Identify and protect significant cave resources pursuant to 43 CFR Part 37.
- Identify, protect, and manage caves and paleontological sites to maintain or enhance significant scientific, educational, wildlife and recreational values.
- Inventory and monitor paleontological resources using scientific principles and expertise in accordance with 16 USC 470aaa-1.

Management Concern: Visual Resource Management (VRM)

Range management, forestry, fuels management activities, and rights-of-way for utility, transportation, and communication facilities are the primary actions affecting visual resources in the Lewistown RMP planning area. The BLM is responsible for ensuring that the scenic values of public lands are considered in all proposed actions that may affect visual quality. The BLM manages the visual resource by identifying visual resource values, establishing objectives for managing those values, and taking action to achieve the visual management objectives.

Planning Questions

- Where are the different visual resource values within the planning area, and to what degree should they be protected?
- How will the impacts to the visual resource inventory values (scenic quality, sensitivity, and distance zones) be assessed individually and quantified?
- Are there any visual values that are of a scarce nature, and how would this be determined and managed for protection?
- How will the impact on the human appreciation/use/experience of the scenic resource be accounted for within the impact analysis of visual resources?

Preliminary Planning Considerations

- Follow guidance described in BLM Manual Section 8400, Visual Resource Management.
- Follow guidance described in BLM Handbook H-8410-1, Visual Resource Inventory Guidelines and Visual Resource Inventory Data Standard Report.
- Complete a visual resource inventory for the planning area and then identify VRM classes.

Management Concern: Social and Economic Sustainability of Local Communities

High economic priorities for the local communities of central Montana are agriculture, ranching as a way of life, recreation, and tourism on public lands. Commercial outfitting, guide businesses, and recreational hunting associated with deer, antelope, and upland game birds are also factors influencing the local economy. Forest health concerns, including emphasis towards fuels management in the wildland/urban/rural interface, continue to increase the importance of extracting timber products from public lands, thus creating jobs within local communities.

Planning Questions

- How will management of BLM lands affect the social and economic conditions of local economies?
- How will management of BLM lands affect the resiliency and sustainability of local economies?

Preliminary Planning Considerations

- Promote social and economic diversification in central Montana.
- Recognize the increasing demand for resources on public lands.
- Recognize that economies of local communities are dependent on goods and services derived from public lands.
- Social scientific data and methods will be integrated into the entire planning process, from preparing the pre-plan to implementation and monitoring.

APPENDIX G

DIGEST OF SCOPING COMMENTS BY PLANNING CATEGORY

AIR AND ATMOSPHERIC VALUES (AA)

COMMENT NUMBER	COMMENT RELATED TO AIR AND ATMOSPHERIC VALUES (INCLUDING AIR QUALITY, CLIMATE CHANGE AND NOISE)
S-0001-03	Stop all the burning because it pollutes the air with releasing fine, particulate matter which causes lung cancer, heart attacks, strokes, pneumonia, allergies and asthma. It's time to stop giving us bad air to breathe to kill us. That air comes east across the rest of America.
S-0003-11	And QUIET. In a noisy world quiet areas are getting harder to find. Please preserve what we have.
S-0007-02	Having canoed the Missouri River numerous times since 1979, I am concerned about cottonwood regeneration, invasion of noxious weeds, loss of solitude and quiet, destruction of riparian habitat by motorized travel, (air, land and water) and livestock use.
S-0013-02	STOP TH(e) BURNING AND STOP THE CIRCULATION OF DISEASES THAT KILL FROM FINE PARTICULATE MATTER.
S-0047-11	Oil and gas development is the second largest polluter (behind wildfires) when it comes to air quality. There are a few steps that the RMP can take to address this. One major impact from oil and gas in terms of air quality is the occurrence of flaring. In Montana, oil and gas wells can flare for an unlimited amount of time, if they produce less than 100,000 cubic feet of gas per day. This is extremely hazardous for the local air quality and contributes the larger threat of climate change. Although there is less development in the Field Office than in the Bakken where much of the flaring occurs, the RMP should still limit flaring and require green completion systems for all federal wells. Fortunately, according to a 2012 GAO report on natural gas emissions on federal lands, "data from EPA, supported by information obtained from technology vendors and GAO analysis, suggest that around 40 percent of natural gas estimated to be vented and flared on onshore federal leases could be economically captured with currently available control technologies. ^{8"} There is no reason why the BLM could not institute these technologies as conditions on each lease or as an overall RMP policy due to the climate and air quality impacts.
S-0047-12	In terms of climate change, the situation is dire even in a sparsely populated state such as Montana. According to the Billings Gazette, "carbon dioxide emissions rose by more than 11 percent in Montana last decade as the state continued to have one of the highest per capita greenhouse gas emission rates in the country." ^{9"} This is directly a result of dirty energy development such as coal and oil and gas. The RMP should be a document that seeks to substantively address the increase of climate change emissions. A simple solution would be putting more of the BLM minerals off-limits to leasing or requiring emission capture systems as mentioned in the paragraph above. The BLM needs to use these RMPs to take action on this issue.
S-0049-01	Air Quality Analyses and Mitigation/or Federal Oil and Gas Decisions through NEPA We recommend that the RMP/EIS consider and disclose the potential environmental effects of oil and gas development in the planning area and determine whether there is a need to revise standards and guidelines (including leasing stipulations) to minimize the potential impact of oil and gas development. We understand that since this will be a programmatic analysis, site specific projects are not being considered or approved.

S-0049-02	The EPA, U.S. Department of Agriculture and U.S. Department of Interior entered into a "Memorandum of Understanding (MOU) Regarding Air Quality Analyses and Mitigation for Federal Oil and Gas Decisions through the National Environmental Policy Act Process" on June 11, 2011. We believe using this helpful tool will ensure effective and efficient NEPA air quality evaluations.
S-0049-03	<p>The EPA recommends that the RMP/EIS disclose the current air quality conditions in the planning area, as well as potential air quality impacts associated with future activities contemplated in the planning area. More specifically, the EPA recommends that the Draft RMP/EIS include an evaluation of the direct, indirect, and cumulative impacts from potential RMP activities on the following:</p> <ul style="list-style-type: none"> • Each of the criteria pollutants and their appropriate NAAQS, i.e., ozone, particulate matter, carbon monoxide, nitrogen oxides, sulfur dioxide and lead; • AQRVs in potentially impacted Class I areas and sensitive Class II areas; • Prevention of Significant Deterioration increment at potentially impacted Class I and sensitive Class II Areas; and • Projected ambient concentrations of hazardous air pollutants including Acetaldehyde, Benzene, Ethyl benzene, Ethylene glycol, Formaldehyde, Methanol, n-Hexane, Toluene, Xylene (mixture), and any other compounds that the BLM identifies as potential hazardous air pollutants in the planning area.
S-0049-04	The EPA recommends that the BLM identify mitigation measures (including control measures and design features) it would apply at the project level in the event that potential adverse impacts to air quality or AQRVs on affected lands are predicted. These could include emission standards or limitations, best management practices (BMPs), dust suppression measures for unpaved roads and construction areas, incorporation of the Interagency Prescribed Fire Planning and Implementation Procedures Guide (July 2008) into site-specific prescribed burn plans, control technologies, and limitations on the pace of development. The EPA also recommends that the BLM identify the regulatory mechanisms it will use to ensure their implementation (including lease stipulations, conditions of approval, and notices to lessees).
S-0049-34	<p>Pursuant to draft Council on Environmental Quality (CEQ) guidance and Executive Order 13514, the EPA recommends that the BLM include an analysis and disclosure of greenhouse gas (GHG) emissions and climate change associated with the RFD for the planning area, potential climate change impacts from the emissions, reasonable alternatives and/or practicable mitigation to reduce project-related GHG emissions, and a discussion of any appropriate climate change adaptation issues. For the RMP/EIS analysis, we suggest the following approach:</p> <ul style="list-style-type: none"> • Estimate the anticipated GHG emissions associated with the full potential RFD for the planning area. We recommend that GHG emissions be estimated in CO₂-equivalent terms and translated into equivalencies that are more easily understood by the public (e.g., annual GHG emissions from x number of motor vehicles, see https://www.epa.gov/RDEE/energy-resources/calculator.html). • We recommend that the BLM assess and identify measures to reduce GHG emissions associated with the full potential RFD for the planning area, including alternatives and/or potential requirements to mitigate emissions. • Describe any existing Regional, Tribal or State climate change plans or goals that cover the planning area. • Include a summary discussion of ongoing and projected regional climate change relevant to the planning area in the "affected environment" section of the RMP/EIS, based on U.S. Global Change Research Program assessments. This would enable the RMP/EIS to identify potential impacts that may be exacerbated by climate change (e.g., reclamation could become more difficult with climate change, or the impacts of water consumption could increase). It would also enable the BLM to determine whether it may be appropriate to consider reasonable alternatives to adapt to anticipated climate change.
S-0049-35	Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," applies to federal agencies that conduct activities that substantially affect human health or the environment. Consistent with this order, the EPA recommends the NEPA analysis for the Lewistown RMP include the following:

	<ul style="list-style-type: none"> • Identification of any minority, low-income and tribal communities within the geographic scope of the impact area, including the sources of data and a description of the methodology and criteria utilized. The EPA recommends comparing census block group percentages (if available, or, at a minimum, census tract data) for below poverty and minority populations with the state average, and conducting the following steps if a block group percentage is greater than the state average. The EPA does not recommend use of higher thresholds. • A detailed assessment of environmental justice and other socioeconomic concerns for any environmental justice communities, to the extent information is available, including: <ul style="list-style-type: none"> • A discussion of the potential direct, indirect and cumulative environmental impacts of potential BLM-authorized RMP activities on the health of these communities, including air quality and water quality and quantity impacts. • An evaluation of the socio-economic impacts to the local communities, including the potential for any additional loading placed on local communities' abilities to provide necessary public services and amenities. • A determination of whether there may be disproportionately high and adverse impacts, including cumulative impacts, on the identified communities. • Mitigation measures to reduce any disproportionate adverse impacts. We recommend involving the affected communities in developing the measures. The EPA recognizes the need for early involvement of the local communities, and supports the meaningful participation of community representatives in the NEPA process.
S-0054-37	Noise limited to no more than 10 dBA above ambient, where technologically feasible.
S-0055-01	Wild areas provide the best wildlife habitat, clean water, and, in my opinion, by far the best opportunity for recreation such as hiking and hunting away from the crowds. Please conduct wilderness inventories on all lands which may qualify for protection and on areas which contain critical wildlife habitat, historical values, and opportunities for quiet, non-motorized recreation.
S-0072-27	As with the rest of the planet, land and habitats within the planning area are undergoing adaptation to climate change, which will affect the distribution and diversity of the species on the landscape ⁷⁴ . In the western United States, both the frequency of heavy precipitation events and the frequency of periods of drought have increased over the past century (Christensen et al., Regional Climate Projections, IPCC Fourth Assessment ⁷⁵). The BLM must evaluate the proposed decision in the context of climate change as both a baseline issue and a cumulative impact to the resources.
S-0072-28	The livestock sector contributes a larger share of carbon emissions than does transport (Steinfeld et al., 2010 ⁷⁶). The environmental analysis should document the expected greenhouse gas emissions from the project for each alternative over the ten-year life of the permit, and the contribution this project will make to overall greenhouse gas emissions within the planning area that contribute to global warming.
S-0072-29	The NEPA documents should review the changes that are likely to occur in the project area due to global climate change over the 10-year period of the proposed permit. While uncertainties remain regarding the timing and extent of impacts from climate change, modeling indicates that on average, Montana will likely experience higher temperatures in all seasons; longer dry periods; heavy precipitation events; more frequent droughts; and increased wildfire risk. These changes will affect the landscape of planning area, especially riparian and water resources and the species that depend on them as well as the amount and availability of forage. Landscapes that are less fragmented provide greater opportunity for species to shift ranges without being blocked (Opdam and Wascher, 2004 ⁷⁷). Fragmentation of the landscape through vegetation removal or grazing infrastructure such as fencing exacerbates the challenges that species are already dealing with in trying to adapt to a changing climatic regime. Removing or reducing livestock would both alleviate a widely recognized and long-term stressor and make these public lands less susceptible to the effects of climate change (Beschta et al., 2012 ⁷⁸).

S-0073-11	<p>Streams and rivers throughout Montana have experienced deleterious impacts to the aquatic environment in recent drought years due to low stream flows, increased water temperatures, and/or inadequate over-wintering habitat. The environmental analysis should consider the cumulative effects of climate change and drought, including aquatic ecosystems that will be adversely impacted by climate change. By removing other stressors, vulnerable watersheds can be managed to prevent regime shifts brought on by the impacts of climate change. Reducing the effects of land use activities (e.g. applying a ½ mile NSO buffer) will help to offset the effects of climate change by increasing the resiliency of watersheds that support coldwater fisheries. Conversely, management decisions that result in a higher degree of impacts will intensify the effects of climate change.</p>
S-0086-06	<p>The BLM Does Not Have the Authority to Regulate Air Emissions in Montana: We recognize that BLM intends to will summarize all relevant background air quality and climate information associated with the planning area and identify all potentially affected Class I areas as well as actions that could be taken to protect these areas during the RMP revision process. We also understand that BLM will identify area-wide criteria or restrictions that would be applied to any activity authorized by the field offices to ensure compliance with all local, state, federal, or tribal air quality standards and implementation plans..." We also understand that BLM will comply with procedures in the Memorandum of Understanding among the U.S. Department of Agriculture, U.S. Department of the Interior and U.S. Environmental Protection Agency, regarding air quality analysis and mitigation for federal oil and gas decisions through the NEPA process which was signed on July 23, 2011. Nevertheless, we remind BLM that it does not have direct authority over air quality or air emissions under the Clean Air Act ("CAA"). 42 U.S.C. §§ 7401 et seq. Under the express terms of the CAA, the Environmental Protection Agency (EPA) has the authority to regulate air emissions. In Montana, the EPA has delegated its authority to the Montana Department of Environmental Quality (MDEQ). The Interior Board of Land Appeals (IBLA) has equivocally determined that the State and not the BLM, has authority over air emissions. Specifically, IBLA found that ensuring compliance with Federal and State air quality standards, setting maximum allowable limits (NAAQS and WAAQS) for six criteria pollutants CO (carbon monoxide), SO₂ (sulfur dioxide), NO₂, ozone and particulate matter (PM₁₀ and PM_{2.5}), and setting maximum allowable increases (PSD Increments) above legal baseline concentrations for three of these pollutants (SO₂, NO₂, and PM₁₀) in Class I and Class II areas is the sole responsibility of the State through MDEQ with oversight from EPA.</p>
S-0086-07	<p>With respect to potential visibility impacts, the BLM's authority is also limited by existing federal law. Under the CAA, a federal land manager's authority is strictly limited to considering whether a "proposed major emitting facility will have an adverse impact" on visibility within designated Class I areas. 42 USC § 7475(d)(2)(B) (2010). Oil and gas operations do not meet the definition of a major emitting facility. Further, under the CAA, the regulation of potential impacts to visibility and authority over air quality in general, rests with the MDEQ. 42 USC§ 7407(a) (2010). The goal of preventing impairment of visibility in Class I areas will be achieved through the regional haze State Implementation Plans (SIPs) that are being developed. Although federal land managers with jurisdiction over Class I areas may participate in the development of regional haze SIPs, BLM has no such jurisdiction in Montana. Accordingly, BLM has no authority over air quality and cannot impose emissions restrictions, either directly or indirectly, on oil and gas operations in Montana, particularly if the overall goal is to reduce potential visibility impacts. Rather than attempting to regulate air quality in the Lewistown RMP, we encourage BLM to participate in and abide by the regulatory processes currently underway in Montana. Any attempt by the BLM to regulate air quality could lead to inconsistent, confusing, and possibly illegal standards.</p>

S-0087-06	<p>We are also greatly concerned with the impacts of climate change and how federal land management actions may be contributing to climate change. Not only does the development of solid minerals, fluid minerals, and energy fragmentation and reduce habitat for wildlife, fish, and native plants, this type of development can contribute to climate change. For example, native plant communities are known to sequester carbon and ameliorate climate. Surface disturbance and occupancy reduces the ability of native plant communities to provide climate regulating ecosystem services. Emissions that result for fluid minerals contributes directly to climate change through increased radiant forcing. Although, these types of actions may seem limited to the region the effects of climate change impact the globe. Therefore, we do not support actions posed by the BLM that contribute to positive radiant forcing. We do support actions that help mitigate the effects of climate change. For example, establishing management actions and objectives to promote climate regulating ecosystem services and maintenance and enhancement of large landscapes dominated by native vegetation. To better help you understand our position on climate change we have attached our Climate Change Policy.</p>
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ACCESS (AC)

COMMENT NUMBER	COMMENTS RELATED TO ACCESS (AC)
S-0004-06 (DUPLICATE)	Identify opportunities to improve public access and consolidate public lands through conservation easements, land trades, and land acquisitions.
S-0009-01 (DUPLICATE)	Loss of hunting and other access to private farm and rangeland in Montana, as across the West, is becoming a critical problem. Wildlife habitat on private lands is being lost to an agricultural industry responding to booming new global markets. Energy development has demanded, and will continue to demand, tradeoffs from wildlife and public lands recreation. All of these factors increase the importance of the Lewistown RMP to every stakeholder in these public lands.
S-0034-50	Every public access closure through private land should be challenged and protected by asserting legal right-of-ways.
S-0036-01	<p>Emphasis should be placed on expanding opportunities to improve public access and consolidate public lands through conservation easements, land trades, and land acquisitions.</p> <p>RATIONALE:</p> <ul style="list-style-type: none"> • Our nation is dealing with growing obesity epidemic and mental health crisis. Wild places can bring relief to stressed life styles and become superb settings to exercise and build self confidence. We need to preserve these places where people can find healthy and natural recreation. • Access to undisturbed and primitive environments helps children and citizen scientists gain interest in and understanding of science, biology, geology, ecology, environment, natural history, and ancient civilizations.
S-0043-07	<p>Acquisition of Access to landlocked parcels. Acquiring public access to the boundaries of large BLM holdings where no such access currently exists must become the top travel priority for BLM management.</p> <p>Proceed with no land exchange transactions that will negatively impact future public access to hunting and fishing opportunities in the area of the proposed exchange. Coordinate with FWP in evaluating wildlife management outcomes of completed exchanges.</p> <p>Identify parcels without legal public access and direct efforts to improve legal public access.</p> <p>Prohibit hunting outfitting on BLM lands where the general public does not have legal access.</p>

S-0053-02	Another issue that I would like to see addressed is related to the disposition and management of the many small scattered parcels of BLM land in places such as Meagher County. Many, if not most of, these parcels have no public access, as they are surrounded by private land. In addition, these parcels are usually not managed separately from the surrounding private property. I would like to see the BLM through disposals, acquisitions, and land exchanges work to block up areas of BLM land or public land in general, i.e. block up BLM land with adjacent USFS land or state DNRC land that is public accessible, to improve public access.
S-0058-05	Public access We would urge BLM to identify opportunities to improve public access to public lands, and to consolidate public lands through acquisitions, land trades, and conservation easements.
S-0059-04	Land tenure in the Lewistown planning area has already proven to be a controversial topic. In light of present circumstances, the BLM should review the previous Judith Resource, Headwaters, and Judith-Valley-Phillips RMP documents, and look at future land tenure decisions to develop a trend towards retaining sensitive and ecologically important areas, revisiting previously-identified disposal lands, and providing adequate open space for the public. As population increases, it will be crucial that consideration be given to providing adequate open space and trails on public lands. Particular attention should be taken to prevent the sale or exchange of BLM lands highly valued by local communities for their open space, wildlife habitat, and recreation opportunities they provide. Also, LWCs should be a priority as land configuration is an important consideration. Land sales or exchanges that can improve continuity, recreational opportunities, or wildlife habitat within or surrounding LWCs and ACECs should be a priority through conservation easements, land trades, and land acquisitions.
S-0065-02	Consider land-swaps and/or conservation easements with private citizens if the action results in increased public access or improved habitat connectivity for species. Creating a management plan on a landscape level has been shown to improve the health of the landscape and increase biodiversity in critical areas. Creating areas that allow for landscape level management will allow for a more comprehensive scale of planning. Additionally, 'islands' of BLM land that are not publically accessible, such as that in Durfee Hills in Fergus County, are of little value to the public due to their restricted access. Facilitating mutually beneficial agreements with private citizens will create improved management practices and increase public access.
S-0074-05	Identify opportunities to improve public access and consolidate public lands through acquisitions, land exchanges, and conservation easements. However, in many cases scattered parcels of public land should be retained in public ownership in order to provide broader access over a larger area, so very careful analysis is needed on this issue.

ADMINISTRATIVE PROCEDURE (AP)

COMMENT NUMBERS	COMMENT RELATED TO THE PLANNING PROCESS OR ADMINISTRATIVE PROCEDURES (AP)
S-0034-04	The agency can no longer ignore the significant cumulative effect that all of the motorized closures over the past 30 years have had on motorized recreationists.
S-0034-07	The Lewistown Resource Management Plan DEIS must include adequate evaluation of cumulative effects so that motorized recreation will not be removed from our public lands. An adequate evaluation of cumulative effects would include all past, current, and reasonably foreseeable actions that have or will produce motorized closures in the State. The environmental analysis must adequately address the human environmental including issues, needs, alternatives, and impacts on the public associated with the reduction or lack of adequate motorized recreation. An adequate analysis would include evaluation of significant social, cultural, historical use, current use, future needs, economic impact, and quality of the human environment issues from the perspective of motorized recreationists.

S-0034-12	We request that the Purpose and Need for this action be written to address the significant need for motorized access and motorized recreation in the project area including adequate recognition of the positive impact on the quality of the human environment. The BLM can help address this significant problem by providing an adequate quantity and quality of motorized recreational opportunities. We ask that you adequately address this significant issue associated with the human environment.
S-0034-13	One important component required to avoid confirmation bias is the inclusion of OHV and other motorized recreationists on the inter-disciplinary team.
S-0034-14	First, the needs of the human environment for motorized recreation should be considered part of the natural environment (as required by the original NEPA) and adequately considered in the evaluation.
S-0034-16	We request that this evaluation carefully consider the intent of the Final OHV Management Strategy and use it to designate existing motorized routes and create new motorized routes.
S-0034-18	The BLM must give a hard look at the impact of motorized closures on the human environment. The cumulative effect of all motorized closures has been significant and is growing greater every day yet they have not been adequately addressed.
S-0034-19	We request that the agency not use the existing motorized trail inventory for designating non-motorized trails. Instead, if there is a need for non-motorized trails, then the agency should consider options that do not reduce the existing opportunity for motorized users.
S-0034-20	The project team must formulate at least one alternative that emphasizes OHV use in Roaded Natural and Semi-Primitive Motorized opportunity settings for recreation.
S-0034-21	Alternatives should include areas where OHV trails can be constructed and maintained when demand increases.
S-0034-22	Where cattle grazing has established a network of cow trails, a reasonable alternative would be to allow motorcycle use on these single-track trails as there would be no change in impact or visible use of the trails.
S-0034-23	The action must develop a preferred alternative that mitigates the significant impacts on the public from the loss of motorized access and motorized recreational opportunities from the proposed action and the combined cumulative effect of all other actions in the state.
S-0034-24	The existing level of motorized access and recreation is reasonable alternative and an alternative other than No Action must be built around it. This reasonable alternative should also include mitigation to protect the natural environment and compensate motorized recreationists for the significant cumulative effect of past losses, and enhancement to adequately address the growing need for motorized access and recreation.
S-0034-25	The scope of the project must address both existing routes and new construction.
S-0034-27	A reasonable alternative that must be adequately addressed is the existing level of motorized recreational opportunities plus mitigation projects to protect the environment from existing problem areas, mitigation for past motorized closure cumulative effects, and enhancement for growth.
S-0034-29	The negative social and economic impact experienced by motorized recreationists when motorized recreational opportunities do not exist in nearby public lands must be adequately evaluated and considered in the decision-making.
S-0034-30	The planning team should formulate an Alternative that maximizes all existing recreational opportunities, as well as anticipates and plans for an increase in recreational use in the future.

S-0034-31	<p>The Planning Team should look for management alternatives that provide for mitigation instead of closure. Options other than closure should be emphasized in each alternative.</p> <p>d) Alternatives, or management guidance, directives etc that require closure as the first or only option when resource impacts are identified should be avoided.</p> <p>The Planning Team should carefully consider displaced use. Assuming that closures are eminent in some areas, one could calculate approximately how much existing motorized will be displaced to other areas. The Planning Team should develop alternatives that allow for additional access and additional recreational opportunities in suitable areas in order to properly manage the displaced use.</p> <p>The Planning Team should avoid overly restrictive management prescriptions that limit the land manager's ability to respond to changing recreational patterns.</p>
S-0034-34	If the loss of motorized routes cannot be mitigated within the project area, then a Motorized Access and Recreation Mitigation Bank must be established. This mitigation bank would keep an overall accounting of the miles and acres of motorized access and recreational opportunities closed and the new motorized access and recreational opportunities created to offset that loss.
S-0034-35	The evaluation needs to distinguish the difference in trail requirements and impacts between atvs and motorcycles and use that difference to justify keeping more single track trails open to motorcycles.
S-0034-36	A fair travel management process would start with a comprehensive inventory of all existing motorized routes in use by the public.
S-0034-37	Oftentimes, many of the motorized roads and trails proposed for closure are primitive roads and trails that provide the ideal experience sought by motorized visitors. We request that the analysis adequately evaluate the type and quality of experiences that motorized visitors enjoy and want maintained in the area.
S-0034-43	We request evaluation of the loss of opportunities for off-highway vehicles due to the lack of a continuous system of roads and trails on which off-highway vehicles can be legally ridden and the formulation of a preferred alternative to address that issue. In areas where OHVs must use a roadway, we request that a reasonable travel management alternative be developed that includes the designation of a reasonable network of dual-use roads to allow inter-connection access to OHV recreational resources.
S-0034-45	Most problems associated with visitors can be addressed by education. Education should be the first line of action and all education measures should be exhausted before pursuing other actions.
S-0034-46	In addition to the education initiative discussed above, we also request that the agency undertake a special management initiative that would evaluate areas where the public is not following the designated system of routes.
S-0034-47	We request that the analysis and decision-making avoid restricting motorized access and recreation opportunities to narrow corridors along major roads.
S-0034-56	There needs to be better coordination between adjoining National Forest and BLM lands when making maps, laying out trails, and establishing travel plans. In some cases a trail is open in one jurisdiction but becomes closed when it crosses over the boundary to another jurisdiction resulting in an overall loss of motorized recreation opportunity.
S-0042-02	Incorporate citizen wilderness inventories in the planning process.
S-0044-01	Mineral development could significantly fragment existing large blocks of native habitats. Cumulative effects and impacts of mineral activities at these larger scales should be addressed in the RMP as well.
S-0048-03	In short - the current Resource Management Plan covering my specific area of Northeast Fergus County is working well. Don't fix it! With respect to developing and adopting an updated management plan for any specific area, I urge the agency to consider, first and foremost, the guiding principle of multiple use and sustained yield.
S-0048-04	As you proceed in this planning process, please remember that there is no harm in maintaining the status-quo in a particular area if the current management plan has proven to be successful and beneficial to the various public and private interests.

S-0049-04	<p>The EPA recommends that the BLM identify mitigation measures (including control measures and design features) it would apply at the project level in the event that potential adverse impacts to air quality or AQRVs on affected lands are predicted. These could include emission standards or limitations, best management practices (BMPs), dust suppression measures for unpaved roads and construction areas, incorporation of the Interagency Prescribed Fire Planning and Implementation Procedures Guide (July 2008) into site-specific prescribed burn plans, control technologies, and limitations on the pace of development. The EPA also recommends that the BLM identify the regulatory mechanisms it will use to ensure their implementation (including lease stipulations, conditions of approval, and notices to lessees).</p>
S-0049-31	<p>We recommend the RMP/EIS identify the features of an effective adaptive management plan, including the following:</p> <ul style="list-style-type: none"> • Achievable and measurable objectives to provide accountability and guide future decisions; • Specific decision thresholds with identified indicators for each impacted resource ; • Targets that specify a desired future condition; • Commitment to implement a monitoring plan with protocols to assess whether thresholds are being met; • Commitment to use monitoring results to modify management strategies as necessary; and • Designated timeframes for completion of necessary management modifications.
S-0049-34	<p>Pursuant to draft Council on Environmental Quality (CEQ) guidance and Executive Order 13514, the EPA recommends that the BLM include an analysis and disclosure of greenhouse gas (GHG) emissions and climate change associated with the RFD for the planning area, potential climate change impacts from the emissions, reasonable alternatives and/or practicable mitigation to reduce project-related GHG emissions, and a discussion of any appropriate climate change adaptation issues. For the RMP/EIS analysis, we suggest the following approach:</p> <ul style="list-style-type: none"> • Estimate the anticipated GHG emissions associated with the full potential RFD for the planning area. We recommend that GHG emissions be estimated in CO₂-equivalent terms and translated into equivalencies that are more easily understood by the public (e.g., annual GHG emissions from x number of motor vehicles, see https://www.epa.gov/RDEE/energy-resources/calculator.html). • We recommend that the BLM assess and identify measures to reduce GHG emissions associated with the full potential RFD for the planning area, including alternatives and/or potential requirements to mitigate emissions. • Describe any existing Regional, Tribal or State climate change plans or goals that cover the planning area. • Include a summary discussion of ongoing and projected regional climate change relevant to the planning area in the "affected environment" section of the RMP/EIS, based on U.S. Global Change Research Program assessments. This would enable the RMP/EIS to identify potential impacts that may be exacerbated by climate change (e.g., reclamation could become more difficult with climate change, or the impacts of water consumption could increase). It would also enable the BLM to determine whether it may be appropriate to consider reasonable alternatives to adapt to anticipated climate change.
S-0054-01	<p>We recommend the adoption of the following measures, which are proposed for adoption in the Preferred Alternative of other BLM plan revisions or sage grouse amendments. Some of these are similar to the provisions of Alternatives B and/or C. Limit OHV use to designated roads and trails; limit to existing roads and trails pending designation in the context of a 5-year travel planning effort (North Dakota RMP Amendment, Bighorn Basin RMP Revision).</p>
S-0056-02	<p>With respect to outdoor recreation resources, BLM should utilize the planning process to evaluate prevalent uses of public land on equal footing, using similar metrics whenever possible. Additionally, when assigning values to public land resources, BLM should use existing knowledge of the Field Office to consider factors including, but not limited to: geographic distribution of recreational activities, current number of participants engaging in recreational activities, historical use of public lands for recreational activities, and the public's ability to engage in recreational activities if existing opportunities to do so on public land are limited.</p>

S-0056-03	<p>Consider present and potential uses of public land. As previously stated, BLM should include a robust discussion of all recreational activities taking place on public land when evaluating the existing management situation throughout the scoping process. With respect to hunting, angling, recreational shooting, any discussion of existing use should include participation data relevant to the Field Office in question and acknowledge the wide variety of benefits associated with these activities.</p> <p>Additionally, BLM should utilize planning resources to develop alternatives which would expand recreational access of all types. Using the planning process to consider the enhancement of developed recreation opportunities for some, but not all activities for which this is viable has the potential to marginalize stakeholders and limits their ability to effectively participate in the planning process.</p>
S-0056-04	<p>Consider the relative scarcity of the values involved and the availability of alternative means and sites for realizing those values. Many of those who hunt, fish and shoot recreationally in the western United States are highly dependent on federal lands which provide access to these activities. One study, conducted under a Multi-State Conservation Grant issued by the U.S. Fish and Wildlife Service, found that in one western state, 92% of hunters had hunted on public land in the ten years preceding the study. The same study also found that hunters cited “not enough access” and “not enough places to hunt” as the top barriers limiting their participation in the sport.</p> <p>Any planning proposal or action that limits existing hunting, angling or recreational shooting access should not be offered without prior analysis and formal discussion of its impact on the public’s opportunity to participate in these activities as a result of these limitations. Additionally, supporting analysis should be detailed and include discussion of access, proximity of closures to concentrations of existing participants and potential alternatives for those impacted by planning actions which limit existing access.</p> <p>Planning activities which limit recreational shooting should not be evaluated or proposed based on the number of acres which will remain open to shooting under a proposed planning alternative. Justifying shooting closures by simply stating that a certain percentage of acres managed by a Field Office will remain open to dispersed shooting does not appropriately describe the impacts of a proposed planning alternative because it includes no discussion of reasonable access, proximity to concentrations of shooters or viable alternatives available to displaced participants.</p>
S-0058-02	<p>Oil and gas companies are enjoying their Bakken playground in next-door North Dakota, at the same time as thousands of private acres have been taken out of the Conservation Reserve Program and converted to cropland. These two contextual facts mean it is even more critical than usual that your RMP provide balance in Montana. We urge you to consider this wider context as you write the “Affected Environment” section of your Draft RMP.</p>
S-0058-03	<p>We have one recommendation about how BLM can manage Lewistown Field Office lands in a way that also protects the Monument, and reflects the values of the Conservation Lands: Please manage this area – particularly the areas directly adjacent to the Monument – at the landscape level, as is required by BLM’s own orders and strategies. This means managing these areas in ways that are consistent with the management of the National Monument.</p> <p>BLM’s own manual for the day-to-day management of such monuments directs that “NLCS units will be managed as an integral part of the larger landscape, in collaboration with all BLM programs” (p. 1-6, 6100 – National Landscape Conservation System Management Manual). BLM’s own strategies also call for landscape-scale management (please see two strategies, “The National Landscape Conservation System: 15-Year Strategy 2010-2025,” and “Bureau of Land Management Montana/Dakotas: National Landscape Conservation System, Three-Year Strategy 2013-2015”).</p> <p>The necessity for BLM to manage the Monument at a landscape level should be mentioned in the “Affected Environment” chapter of your Draft RMP, so that your baseline assessment includes a crucial piece of information about wildlife corridors and other connectivity between the Lewistown Field Office and the Monument.</p>

S-0059-01	We request that the BLM make available geospatial data to the public to assist in identifying new data needs. Please look at the BLM Arizona's web page at http://blm.gov/az/GIS/files.htm#strip for a good model of data availability for baseline information.
S-0059-02	In order to conduct an effective analysis, BLM needs to assess impacts and effects such as ecological, aesthetic, historic, cultural, economic, social, or health, whether direct, indirect, or cumulative. 40 C.F.R. § 1508.8. To date, we have seen only marginal analyses of the environmental impacts to Lands with Wilderness Characteristics (LWCs). A thorough analyses will help the public and the BLM to understand the short and long-term consequences of proposed actions.
S-0059-03	Considering the proximity of the Lewistown unit to other areas with approved or adopted resource-related plans, the BLM should include an evaluation of and prescriptions for how the plan will be consistent with the Upper Missouri River Breaks National Monument, Charles M. Russell National Wildlife Refuge, and the Flathead National Forest. 43 C.F.R. § 1610.3-2. The Lewistown planning area shares many similar values to these resource areas and should be viewed in the larger context as part of a contiguous landscape. The Antiquities Act of 1906 (16 U.S.C. §§ 431-433) requires that the BLM protect and manage the objects of scientific and historic interest listed in the Presidential Proclamation that established the Monument. This RMP should include goals and objectives that support the goals and objectives described in the Proclamation that cross into the planning area or that could potentially impact the UMRBNM.
S-0059-05	<p>Lands with Wilderness Characteristics</p> <p>We expect that the BLM will adhere to the documentation and minimum standards for review outlined in BLM manual 6310. During the summer of 2014, we will be inventorying many of these lands ourselves. We hope that, where appropriate, the BLM will consider our findings “new information” and evaluate it as such.</p> <p>We also strongly encourage the BLM to inventory BLM lands that surround existing WSAs which include Cow Creek, North Fork of the Sun River, Musselshell Breaks, Square Butte, Bridge Coulee, Beaver Meadows, and Antelope Creek.</p>
S-0059-07	The BLM should ensure that specialists that are involved with determining naturalness for an area are mindful of BLM Manual 6310.06(C)(2)(b). Apparent naturalness is meant to be perceived by the average visitor who is not familiar with the biological composition of natural ecosystems versus human-effected ecosystems. This disposition will be important because this area can be considered cattle country to some and there will undoubtedly be various types of range improvements. Also, human impacts outside of the boundary should not normally be considered unless the impact is pervasive and omnipresent.
S-0059-10	It is important that the BLM follow its multiple use and sustained yield mission and FLMPAs guidance. These public lands are to be managed for the protection of quality of scientific, scenic, historical, ecological, and archaeological values; for preservation and protection of certain lands in their natural conditions; to reconcile competing demands; to provide habitat for fish and wildlife; and to provide for outdoor recreation. FLPMA also requires the BLM to prepare land use plans that may limit certain uses in some areas. 43 U.S.C. § 1712. Our interpretation of multiple use is that it does not mean all things in all places, but to prioritize the protection of competing values for an area. This is yet another argument for the importance of a thorough wilderness inventory and proper documentation of findings.
S-0060-01	Increasing demands for energy and other resources, fragmentation of habitats from new roads, the increasing threat of uncharacteristic wildfires, invasive species, and contentious political debates indicate that a backcountry focused land use planning tool is needed in the Lewistown RMP. This tool should recognize and give attention to important wildlife habitat and valued “backcountry” lands, and be applied with a strong restoration emphasis to address modern management challenges.

S-0061-01	The main goal I would like to see the BLM pursue is on being more conservation oriented. In light of that, I would like to see the areas that have wilderness values or characteristics maintained. Included in your analysis should be citizen inventories of wild lands. Please consider areas along the Rocky Mtn Front that are not protected now. These areas are in the Rocky Mtn Front Heritage Act, but they may not be protected if the Act does not pass.
S-0062-06	Please incorporate citizen inventories of lands with wilderness characteristics in one or more alternatives in the EIS.
S-0062-07	Finally, I hope you will make an effort to disallow development near the boundaries of the monument, refuges, the Front, and other designated areas.
S-0063-01	As a federal land management agency responsible for managing public land for a multiple of uses, the Cascade County Commissioners encourage you to fairly balance conservation and commercial uses. Given the fragmented nature of many BLM lands, it is especially important to ensure that management prescriptions are compatible with surrounding lands. At the same time, decisions made now will be longstanding and should be made with a view toward the future.
S-0065-01	Consider citizen inventories when planning areas that are considered Lands with Wilderness Characteristics (LWC areas). Citizen inventories would be conducted in accordance with BLM manuals 6310 and 6320 in order to reflect the new inventory process.
S-0067-01	"Save" Comment noted on map of the planning area at a public scoping meeting; BLM parcel adjacent to Forest Service on Rocky Mountain Front southwest of the Teton River was circled.
S-0072-01	Hopefully, the LRMP will sufficiently address the environmental impacts of livestock grazing. The LRMP must present the depth of analysis and consideration of grazing alternatives warranted by a land use plan for all BLM-managed lands in central Montana.
S-0072-02	Maintaining and improving wildlife habitat and restoring degraded range conditions should be reflected in the purpose and need for the LRMP in compliance with both the Taylor Grazing Act of 1934, the Federal Lands Policy Management Act (FLPMA) of 1976, and other laws that govern livestock management on public lands.
S-0072-03	Thus, the reason for addressing livestock grazing in the LRMP is to improve the range condition of the allotments within the project area and to maintain and improve wildlife habitat. This direction, based on laws and regulations, should be explicitly stated in the "Purpose and Need for the Plan" in the DEIS. Furthermore, the selection of any alternative in the DEIS that does not provide direction for meeting those goals violates the intent of the laws and regulations that govern public land management.
S-0072-04	The purpose and need section of the DEIS should include the need to conserve all wildlife habitat and restoration of degraded range conditions as a purpose of the document.
S-0072-10	The correction of resource degradation caused by domestic livestock and the prevention of future degradation should be driving forces behind the LRMP and should be reflected throughout the NEPA document and in any future agency decisions regarding domestic livestock grazing in the project area. The Alternatives in the DEIS must set specific livestock grazing levels that will be used to meet standards.
S-0072-12	The BLM must define what constitutes a sustainable level of livestock grazing. "Sustainability" is defined in the glossary as "[t]he ability of an ecosystem to maintain ecological processes and functions, biological diversity, and productivity over time." ⁴ The DEIS must explain how it meets this definition of sustainability.
S-0072-20	..the removal of livestock from sagebrush communities in less than satisfactory condition should be a seriously considered alternative in the LRMP.
S-0072-26	Additionally, any analysis of grazing is incomplete without a discussion of the effect the practice has had on predators. The most vehement opposition to wolves, bears, and other predators comes from the livestock industry, and is one of the main reasons some of the species are now listed. Predators perform important top-down ecological functions, yet they are consistently eradicated and heavily managed in order to protect livestock on public land, costing taxpayers millions of dollars. The DEIS must include an analysis of the impacts from livestock grazing on predators in the planning area.

S-0072-27	As with the rest of the planet, land and habitats within the planning area are undergoing adaptation to climate change, which will affect the distribution and diversity of the species on the landscape ⁷⁴ . In the western United States, both the frequency of heavy precipitation events and the frequency of periods of drought have increased over the past century (Christensen et al., Regional Climate Projections, IPCC Fourth Assessment ⁷⁵). The BLM must evaluate the proposed decision in the context of climate change as both a baseline issue and a cumulative impact to the resources.
S-0072-30	The LRMP must meet the requirements of the Federal Land Policy Management Act ("FLPMA"). FLPMA requires the BLM "take action necessary to prevent unnecessary or undue degradation of the lands[.]" 43 U.S.C. § 1732 (b). FLPMA also requires that the BLM manage lands for multiple use "without permanent impairment of the productivity of the land and the quality of the environment with consideration being given to the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output." 43 U.S.C. § 1702(c).
S-0072-37	The National Environmental Policy Act ("NEPA") requires that the BLM consider a reasonable range of alternatives. See 42 U.S.C. § 4332(2)(C)(iii). Considering the presence of endangered, special status, and sensitive species in the planning area, a no grazing alternative and 50% reduction in permitted grazing should be included within the reasonable range of alternatives for the LRMP.
S-0073-09	Stream buffers (i.e. ½ mile NSO stipulations) are linear in profile, meaning that it is feasible to utilize directional drilling technologies to access all of the oil and gas that might underlie these NSO buffer areas. When evaluating the effect of stream buffers on mineral development, we suggest that BLM incorporate this principle into the environmental analysis.
OS-0086-04	The BLM Should Only Analyze Reasonable Alternatives: The National Environmental Policy Act of 1969 ('NEPA) requires an agency only to consider "reasonable alternatives." 40 C.F.R. § 1502.14 (2010). NEPA does not require agencies to analyze the environmental consequences of alternatives that are too remote, speculative, or impractical or ineffective. When developing alternatives for the Lewistown RMP and accompanying environmental impact statement (EIS), BLM must ensure that the alternatives analyzed are in keeping with the requirements of The Council on Environmental Quality (CEQ), which has described reasonable alternatives in its "Forty Most Asked Questions" as "those that are practical or feasible from the technical and economic standpoint and using common sense, rather than simply desirable." Clearly, BLM must avoid analyzing speculative, impractical, or uneconomic alternatives. Specifically, overly stringent restrictions or conditions of approval (COA') that may render development uneconomic must also not be analyzed. Further, given the fact the public lands must be managed for multiple uses, including oil and gas development, alternatives that prohibit or eliminate all oil and gas development within the area are neither practical nor reasonable and need not be studied in detail by the agency.
S-0087-01	Under Article 4 of the Treaty with the Eastern Band Shoshoni and Bannock of 1868 (15 Stat. 673), the Tribes "have the right to hunt on the unoccupied lands of the United States so long as game may be found thereon, and so long as peace subsists among the whites and Indians on the borders of the hunting districts". Therefore, the most important thing that BLM can do is to acknowledge in the Executive Summary and Introduction of the RMP/EIS that management is consistent with the Treaty Rights retained by the Shoshone-Bannock Tribes.
S-0087-04	we would like the BLM to establish goals and objectives for: 1) government to government consultation with the Tribes, 2) ensuring management actions are consistent with Treaty Rights retained by the Tribes, and 3) how to maintain or increase open space and actions that promote high quality habitat for native fish, wildlife, and plant communities.

CAVE AND KARST RESOURCES (CK)

COMMENT NUMBER	COMMENTS RELATED TO CAVE AND KARST (CK)
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S-0046-01	<p>Every BLM official concerned with Crystal Caverns should obtain a copy of that paper from the Lewistown Public Library and read it. There probably is no more thorough discussion of the Caverns and New Year Mine to be found anywhere. First, I would like to note that I refer to this geologic feature as Crystal Caverns, not Crystal Cave, the name the BLM seems to use most. I was surprised to see that on a map, drawn for the BLM and published by that agency, there is reference to "New Year Crystal Cave," and just under it, "Judith Crystal Cave-New Year Mine Cave." Because this feature will be in competition with other caves and caverns, if it is ever developed, and because the biggest competitor will be Lewis and Clark Cavern near Three Forks, I suggest that the name should be Crystal Caverns. This name more accurately reflects that there is more than one room (according to your reports, 15 rooms) and that this is a fairly complex structure not unlike Carlsbad Caverns, which the BLM also manages. So I hope you will use Crystal Caverns as the name for this feature.</p>
S-0046-02	<p>A second note that is of importance to me is that the Caverns always be associated with the New Year Mine. If this is going to be a tourist attraction, we must use every means possible to lure tourists or visitors to the location. Most visitors will want to see the Caverns. The mine tunnel, if available to them, would be of secondary importance. But there are mining buffs, Old West history buffs (of which I am one) and others to whom mining is a very important endeavor and the association with New Year Mine would increase interest in seeing this feature. The adit or entry tunnel could feature, at its far end, a mining diorama which would include the old mining cart still in there. The tracks would be kept in place and the area well lighted. The diorama or dioramas could tell the story of New Year Mine and of Crystal Caverns.</p>
S-0046-03	<p>A third recommendation would be to consider New Year Mine-Crystal Caverns as part of an even larger tourist attraction. It would be possible to construct a lift of some sort, possibly a gondola lift, to the top of New Year Mountain. Tourists could board the lift near the Mine-Caverns entrance and ride up to a small chalet-like or gazebo-like structure from which they could view the surrounding countryside. Historical displays could be there also. From there one should be able to see Lewistown and all the beautiful country surrounding it. If BLM decides to use the New Year Gulch Road to access the mine and caverns, such a lift could begin at the bottom next to the road and, thus, tourists would not need to drive up the winding road to the mine-caverns entrance. Parking could be provided below at roadside.</p>
S-0046-04	<p>As I understand it, it appears access to the mine-caverns area might best come from the Lime Kiln Road. Parking possibly could be at the Duvall Inn area and then people could walk or take people-movers to the mine-caverns entrance. If BLM wished, the old logging road that begins behind Duvall Inn could be improved and extended to the mine-caverns entrance in such a way that tourists could drive their cars up to a parking lot near the entrance. I recently learned that this old logging road was used for logging 20 acres of wind-downed trees in the area so apparently the road is usable. This project occurred fairly recently, I am told. This access road has, as I understand it, the feature of not crossing as much private land as the northern route, and it would be more scenic. Because the new shooting complex is located on the Lime Kiln Road closer to Lewistown, there would be added reason for Fergus County to pave the road from Highway 191 at least as far as the Lime Kiln Canyon entrance. I am told by shooting complex officials that they would like that road paved and I am sure residents on the road would like that also.</p>
S-0046-05	<p>BLM has made clear that public use of Crystal Caverns and New Year Mine will be by guided tour only. This is as it should be to protect the resources inside the Caverns especially. BLM would have to construct a "catwalk" possibly with railings to keep people on one path and keep them away from sensitive features. This kind of walkway is needed because the floor of Crystal Caverns is very muddy. BLM might also require that everyone entering wear a hardhat and protective coverings of their shoes. These items could be provided at the entrance.</p>
S-0046-06	<p>Some sort of electrical lighting system would have to be used and I understand that BLM has considered both electricity by wire or using a generator. I should note that when the caverns were open to the public in the 1920s and 30s, there was an electrical lighting system in use. There also were signs designating certain features some of which, I understand, remain. As much as can be kept for public viewing of that earlier era should be retained. There are many people still living in Lewistown who remember going into the caverns as children. I have interviewed many old-timers who went in. The caverns was a tourist attraction for more than 20 years.</p>

S-0046-07	Amazingly, bats have never used the caverns which helps BLM in planning public use of the feature. Since Crystal Caverns is a living caverns in which the geologic features such as stalagmites and stalactites are still growing and being created, the caverns could be a living caverns research facility to determine if there is any harmful impact from public use. If notable harm was occurring, of course, the caverns could be closed.
S-0046-08	Crystal Caverns and New Year Mine should be viewed in a much larger historical context, that of the Judith Mountains and environs. You had two major mining towns there, Maiden and Gilt Edge, and many smaller towns including New Year. Maiden at one point had 3,000 people and was considered, along with Cottonwood and Lewistown, for the Fergus County seat. James Fergus favored Lewistown so you see who won.
S-0046-10	I attended the Lewistown scoping session where you told me I should send you my comments via e-mail, which I am doing. Let me conclude by saying I strongly support development of the Crystal Caves-New Year complex as a tourist attraction. I believe most residents of Central Montana support this development. I believe such a development would have a great economic impact on Lewistown and the surrounding area. I believe as many or more visitors would come to Crystal Caverns as now go to Lewis and Clark Cavern. And finally, I understand that you are including development of Crystal Caverns in your new management plan. I hope that is the case and that you carry on with your studies and preparations so the Caverns-Mine complex can become a major Montana tourist attraction.
S-0050-01	I was in the the New Year mine cave (the Crystal Cave) last summer. It is spectacular and should eventually be opened to the public. Fortunately, there are no protected bats or other wildlife residing in the mine workings or cave so we humans should be allowed to enjoy it. I understand it would likely require extending a hiking trail from the existing Lime Kiln trail system for visitor access by foot. A qualified guide would likely be required to escort visitors into the underground workings and cave; both for safety and security purposes. Rules and guidelines would have to be developed. Possibly qualified volunteers could serve as guides. Tours could be set on a schedule - say once per month in the summer and possibly also by appointment. Vehicular (ATV, four-wheeler) access beyond the end of the existing public road should be obtained from New Year Gulch property owners. This could be a stipulate and restricted access allowing the "guide and other authorized personnel" the option and ease of vehicular access rather than having to hiking in; provide emergency access; and a means for getting supplies, tools, and such to the adit site. As an experienced underground miner, and familiar with other caves in the Judith's, I could be willing to help out with this project.

CULTURAL RESOURCES (CR)

COMMENT NUMBER	COMMENTS RELATED TO CULTURAL RESOURCES (CR)
S-0034-44	We are concerned about the preservation of historic mines, cabins, settlements, railroads, access routes and other features used by pioneers, homesteaders, loggers, settlers, and miners. These are important cultural resources and should not be removed from the landscape. We request that the ties to the land that are part of our local western culture and heritage be protected and that the preferred travel management alternative include opportunities to visit these features as part of motorized interpretative spur destinations and loops.
S-0044-04	Federal minerals underlie the Egg Mountain dinosaur site owned by Museum of the Rockies, the surface of which is also protected by the Nature Conservancy conservation easement. This site is one of the most significant paleontological localities in the country, and may be eligible for future listing on the National Register of Historic Places. Other federal minerals occur within the same geological formation and likely have important paleontological resources as well. Potential impacts of mineral activities to these paleontological and historic resources should be addressed in the RMP, including appropriate stipulations to protect these resources.

S-0044-05	The Nature Conservancy is concerned that federal mineral leasing and development could have significant impacts to the surface and conservation values that have been protected on the Rocky Mountain Front. The lands on the Front contain numerous wildlife, vegetation, hydrologic, cultural and large scale habitat values that require special consideration. Decisions regarding federal minerals on the Front should offer the highest protections possible for these special values, including special protective stipulations, no surface occupancy, or closure to leasing, especially on lands where the surface has been protected for conservation purposes.
S-0046-02	A second note that is of importance to me is that the Caverns always be associated with the New Year Mine. If this is going to be a tourist attraction, we must use every means possible to lure tourists or visitors to the location. Most visitors will want to see the Caverns. The mine tunnel, if available to them, would be of secondary importance. But there are mining buffs, Old West history buffs (of which I am one) and others to whom mining is a very important endeavor and the association with New Year Mine would increase interest in seeing this feature. The adit or entry tunnel could feature, at its far end, a mining diorama which would include the old mining cart still in there. The tracks would be kept in place and the area well lighted. The diorama or dioramas could tell the story of New Year Mine and of Crystal Caverns.
S-0046-03	A third recommendation would be to consider New Year Mine-Crystal Caverns as part of an even larger tourist attraction. It would be possible to construct a lift of some sort, possibly a gondola lift, to the top of New Year Mountain. Tourists could board the lift near the Mine-Caverns entrance and ride up to a small chalet-like or gazebo-like structure from which they could view the surrounding countryside. Historical displays could be there also. From there one should be able to see Lewistown and all the beautiful country surrounding it. If BLM decides to use the New Year Gulch Road to access the mine and caverns, such a lift could begin at the bottom next to the road and, thus, tourists would not need to drive up the winding road to the mine-caverns entrance. Parking could be provided below at roadside.
S-0046-08	Crystal Caverns and New Year Mine should be viewed in a much larger historical context, that of the Judith Mountains and environs. You had two major mining towns there, Maiden and Gilt Edge, and many smaller towns including New Year. Maiden at one point had 3,000 people and was considered, along with Cottonwood and Lewistown, for the Fergus County seat. James Fergus favored Lewistown so you see who won.
S-0046-09	The Judith range is home to a rare fish, it was once home to an Air Force radar station, also a bible school, an historic Girl Scout camp and several major mines like the Gilt Edge, Spotted Horse and Maginnis mines. The Maginnis is owned by a Maiden resident who continues to work it. Hundreds of thousands of dollars of gold and silver came out of those three mines and many others. The New Year Mine was operated for some time but was not a big producer. There also are tales that Spanish gold is hidden in the Judiths awaiting the finder. Of all the island mountain chains in the Lewistown area, the Judiths have the richest history. All of this could be told in dioramas in the adit or elsewhere.
S-0050-02	<p>Collar Gulch should be opened back up for vehicular public access by opening the gate. The difficult decent and poor road in itself will limit the type and amount of traffic. It seems that the fish have been well protected and after 20 years of the access being closed it should once again be available to members of the public who are not capable of hiking in by way of the Camp Maiden road or the Collar Gulch Trail system. The gulch was a favorite place for many people for many years. The old Collar Mill stone foundation and dam farther up the creek are significant historical sites. And, it's always thrilling to view the fish. Thought should also be given to possibly lifting or reducing the size of the Collar Gulch ACEC designation. Is it still necessary?</p> <p>The BLM should survey and mark the boundary between public lands and private property in Collar Gulch. A sizable portion of Collar Creek is within the boundary's of the Hendricks and Edwards patented mining claims. The BLM should inquire with the property owners to determine if they would be interested a land swap or sale. As one of those owners, I would consider it.</p>
S-0050-03	A historic landmark is located near the mouth of Maiden Canyon. This is a large limestone outcrop that resembles an elephants head and trunk and is know as "the Elephants Head" dating back many years. This unique feature can barely be seen now because of tree growth. Enough trees could be removed to one again expose the Elephants Head for the public's enjoyment. Possibly the trees could be designated/marked and then harvested by fire wood gathers.

S-0055-01	<p>In developing your new Resource Management Plan I ask you to give strong consideration to protecting areas with wilderness characteristics. Wild areas provide the best wildlife habitat, clean water, and, in my opinion, by far the best opportunity for recreation such as hiking and hunting away from the crowds.</p> <p>Please conduct wilderness inventories on all lands which may qualify for protection and on areas which contain critical wildlife habitat, historical values, and opportunities for quiet, non-motorized recreation. This should include areas that have the potential for restoration from past damage, current noxious weed infestations, or areas with illegal or damaging off road vehicle use. Prevention of further degradation and restricting further damage now, while the planning process is ongoing, is necessary.</p> <p>Given the vast expanse of the Lewistown management area, I strongly encourage you to take advantage of wild land inventories done by non-governmental groups, such as the Montana Wilderness Association.</p>
S-0059-12	As this area is considered to be Lewis & Clark country, it is imperative that these resources remain protected. We recommend that the BLM consider the work of George N. Ruebelmann's "An Archaeological Study of the Lewistown BLM District."
S-0083-03	*Cultural and Historic Inventory: Identify areas that may have significant cultural and historic values and conduct as extensive a cultural and historic survey as is possible.

FIRE MANAGEMENT (FM)

COMMENT NUMBER	COMMENTS RELATED TO FIRE MANAGEMENT (FM)
S-0001-03	Stop all the burning because it pollutes the air with releasing fine, particulate matter which causes lung cancer, heart attacks, strokes, pneumonia, allergies and asthma. It's time to stop giving us bad air to breathe to kill us. That air comes east across the rest of America.
S-0001-06	Stop completely the logging and burning of this site so that gov't agency employees can make extra money. That is what prompts them to burn. They even set the fires themselves to get that extra overtime.
S-0013-02	STOP TH(E) BURNING AND STOP THE CIRCULATION OF DISEASES THAT KILL FROM FINE PARTICULATE MATTER.
S-0050-04	The Maiden Forestry project took off a number of years ago under the experienced leadership of BLM Forester, Bruce Reed. The quality of work that was done on the slopes of Maiden Peak and around Camp Maiden was very good and certainly reduced wildfire fuel loads. The project fell dormant due to the necessary remediation of the Lime Kiln Canyon blow-down event. The Maiden Forestry project should be rejuvenated and move forward both for wildfire fuel reduction, public safety in the event of a wildfire, and good forestry stewardship. I was involved with the project and would lend my assistance again. Spotted Knapp weed flourishes in places along the Judith Peak Road and on Big Grassy Peak. Can this be better addressed in the future?
S-0051-01	<ul style="list-style-type: none"> • Manage conifer encroachment to improve range biodiversity and help control wild fire. • Manage vegetation with continued livestock grazing which improves habitat for sage grouse, reduces fire fuel load, and keeps viable ranches in operation. Viable ranches keep open space available for wildlife, and provide a stable economic base in small communities.
S-0051-08	Wildland Urban Interface <ul style="list-style-type: none"> • Agree with Planning Questions and Planning Considerations at this time.
S-0051-09	Fire Management <ul style="list-style-type: none"> • Consider whether prescribed burns have been successful. An example would be in the Tin Can Hill area. Was enough accomplished for the money spent?
S-0051-10	Livestock Grazing <ul style="list-style-type: none"> • Maintain livestock stocking rates to benefit viable ranching operations, local economy, wildlife, and fire management.

S-0052-02	Issue: Recreation and Visitor Services Prior to designating SRMAs and ERMAs that contain adjoining private land, the private landowner should be consulted. An agreement should be developed that describes the roles and responsibilities for management of the area - these should include responsibility for trash cleanup, the spread of noxious weeds, the degradation of vegetation, and the maintenance of roadways because of the area being used for recreation. As co-owner of the Vogel Dam, the Brady Ranch is concerned about the problems created by the reservoir being a public recreation site. The Ranch was not consulted prior to the area becoming a designated recreation area and has not been consulted about the stocking of fish that has been taking place. Specific problems resulting from high public visitation are driving on the spillway and dam fill - which, according to the BLM engineer, will eventually result in the failure of these structures - blocking access across the dam to the private property, vandalism and ignoring of signage placed by the property owners, driving off roadways, leaving trash, spreading weeds, fire danger, etc. These problems are as detrimental to the BLM managed property as the private property. These issues need to be addressed or the fish stocking of the Vogel Reservoir will end.
S-0054-26	Do not use fire in precipitation zones < 12", except as last resort and where conditions allow and cheatgrass is a very minor component. (NW Colorado RMP Amendment).
S-0054-27	Rest grazing allotments 3 full years following fire; utilize grazing exclosures for monitoring; grazing excluded until woody and herbaceous plants achieve SG objectives. (Bighorn Basin RMP Revision).
S-0060-01	Increasing demands for energy and other resources, fragmentation of habitats from new roads, the increasing threat of uncharacteristic wildfires, invasive species, and contentious political debates indicate that a backcountry focused land use planning tool is needed in the Lewistown RMP. This tool should recognize and give attention to important wildlife habitat and valued "backcountry" lands, and be applied with a strong restoration emphasis to address modern management challenges.
S-0069-01	Although the BLM land in our pasture can't be fenced because of the roughness of the Missouri River Breaks area, we take care of it the same as for our own pasture. We do not overgraze our pasture. Fewer cattle are pastured in a dry year. It is a fact that grazing makes healthier grass not only for cattle but also for wildlife. The fuel for wildfires is greatly reduced. We provide water sources for our cattle and wildlife also benefits. In other words, we manage this environment to be productive and the Federal government has an income from BLM land. If cattle grazing should be reduced, wildlife will certainly suffer, and probably move to other areas.
S-0069-02	We need to keep the roads that are presently used, especially for fighting fires.
S-0072-23	A recent study published in the Journal of Applied Ecology concludes that livestock grazing contributes to the domination of some western landscapes by cheatgrass, an invasive grass that both destroys sage-grouse habitat and increases the frequency of wildfire. ⁷⁰ To mitigate the spread of cheatgrass, the study suggests maintaining and restoring bunchgrasses and soil crusts, two ecological features quickly degraded under the hooves of livestock. Such mitigation would require the decrease or elimination of livestock grazing in the affected areas.

FOREST PRODUCTS (FP)

COMMENT NUMBER	COMMENTS RELATED TO FOREST PRODUCTS (FP)
S-0001-06	Stop completely the logging and burning of this site so that gov't agency employees can make extra money. That is what prompts them to burn. They even set the fires themselves to get that extra overtime.
S-0007-03	The new Resource Management Plan must protect resources first and BLM must be bold in barring uses that threaten native vegetation and critical wildlife habitat. Extractive uses such as mining, timber and grazing as well as motorized recreation must take second place when it coming to managing BLM lands in central MT.
S-0013-06	BAN ALL LOGGINIG.

S-0034-48	Existing timber sale roads and trails should be inter-connected by construction of new trail segments or rehabilitation of existing trail segments to provide mitigation for lost motorized recreation opportunities. Connector trails should be constructed to avoid dead-end trails.
S-0034-55	Agencies are encouraged to avoid trail closures associated with other actions including timber sales, mining, and livestock grazing. Corrective action should be taken where trail closures in the past have resulted from these sorts of past actions. Loss of motorized trails because of past timber sales should be mitigated by connecting old and new travelways to create looped trail systems.
S-0050-03	A historic landmark is located near the mouth of Maiden Canyon. This is a large limestone outcrop that resembles an elephants head and trunk and is know as "the Elephants Head" dating back many years. This unique feature can barely be seen now because of tree growth. Enough trees could be removed to one again expose the Elephants Head for the public's enjoyment. Possibly the trees could be designated/marked and then harvested by fire wood gathers.
S-0050-04	The Maiden Forestry project took off a number of years ago under the experienced leadership of BLM Forester, Bruce Reed. The quality of work that was done on the slopes of Maiden Peak and around Camp Maiden was very good and certainly reduced wildfire fuel loads. The project fell dormant due to the necessary remediation of the Lime Kiln Canyon blow-down event. The Maiden Forestry project should be rejuvenated and move forward both for wildfire fuel reduction, public safety in the event of a wildfire, and good forestry stewardship. I was involved with the project and would lend my assistance again. Spotted Knapp weed flourishes in places along the Judith Peak Road and on Big Grassy Peak. Can this be better addressed in the future?
S-0054-11	Timing Limitations should apply to surface disturbing and disruptive activities. (Lander RMP revision).
S-0062-01	When the timber blow-down occurred in the Limekiln area a few years ago, BLM wanted to build a road to harvest the downed timber. BLM indicated It would close the road once the harvest was completed. A network of roads was constructed. However, I am not aware of any effort so far to reclaim and close the road. In previous planning , this area was to be used primarily for hiking and would be closed to OHVs. I hope you adhere to your previous plans to obliterate the road and keep the area closed to OHVs .

FISH AND WILDLIFE (FW)

COMMENT NUMBER	COMMENTS RELATED TO FISH AND WILDLIFE (FW)
S-0001-04	No animal should be raised to be shot to death. They have a right to life because they are part of the ecology of earth. Letting gun wackos loose is letting loonies loose on earth.
S-0001-05	This is national land, not state land. The MT State Fish & Game grows wildlife to kill it. That is not national policy. MT game agency is a vicious manipulative game agency working solely for gun wacko pleasure at killing. I oppose all wildlife murder on this site. Animals need peace and tranquility to survive with climate change coming.
S-0004-04 (DUPLICATE)	Give special consideration to conserving land near existing wildlife refuges or protected areas, are in the Rocky Mountain Front Heritage Act, or provide critical wildlife habitat.
S-0007-03	The new Resource Management Plan must protect resources first and BLM must be bold in barring uses that threaten native vegetation and critical wildlife habitat. Extractive uses such as mining, timber and grazing as well as motorized recreation must take second place when it coming to managing BLM lands in central MT.
S-0013-03	PROTECT THE WATER FOR THE BENEFIT OF ALL, NOT JUST FOR PROFITEERS. THE WILDIFE AND BIRDS ARE BEING DESTROYED BY BLM BRINGING IN POLLUTING INDUSTRIES AND THAT NEEDS TO TOTALLY STOP.
S-0034-54	Agencies are encouraged to avoid yearlong trail closures if wildlife concerns are valid only during certain seasons. In these instances, closures should be seasonal only with the dates consistent with the requirements to protect wildlife.

S-0036-01	<ul style="list-style-type: none"> • Emphasize and conduct wilderness inventories on all BLM lands 5000 acres or greater to assess naturalness, opportunities for solitude, opportunities for primitive recreation, and supplemental values such as wildlife, historic and cultural sites, and geologic features in accordance with most recent BLM wilderness guidelines. This should include identification of areas and waterways with wildlife or wildland values that are not fulfilled to their true potential due to noxious weeds, past commercial activities, vandalism, or ground disturbances and that could be restored. Special attention should be given to lands near existing wildlife refuges or protected areas and critical wildlife habitat. Emphasis should be placed on expanding opportunities to improve public access and consolidate public lands through conservation easements, land trades, and land acquisitions. • Wild lands, once lost, cannot be replaced. Without protection, critical wildlife corridors will be lost and native habitats will disappear. Future generations will only be able to see wildlife and wild habitat in books and videos - what a loss!!!
S-0042-03	Identify areas and waterways with wildlife or wildlands values that are not fulfilling their potential because of noxious weeds, past commercial activities or ground disturbances that could be restored.
S-0043-08	Protections of all Greater Sagegrouse habitats 1) Any future oil and gas development must be restricted with No Surface Occupancy restrictions on all occupied sage grouse habitats, especially near leks and nesting habitat.
S-0043-09	Protections of all Greater Sagegrouse habitats 2) Strong direction to avoid sagebrush fragmentation by additional roads or construction of overhead powerlines, wind farms, energy development or other uses contributing to fragmentation of sagebrush communities.
S-0043-10 (DUPLICATE)	<p>We ask that you identify areas of lands that are generally intact and undeveloped and that provide high quality fish and wildlife habitat. We ask that you allocate or designate these lands as “backcountry conservation areas” (BCAs) to conserve unfragmented fish and wildlife habitat and dispersed hunting and fishing opportunities. BHA is working with other hunting and fishing based organizations to identify specific intact and undeveloped lands within the BLM Lewistown District that are appropriate for BCA management, and we will follow up with supplemental recommendations that nominate specific areas as backcountry conservation areas. The following provides specific examples of the appropriate allocations or management approaches that should be applied in the Lewistown RMP when adopting BCAs.</p> <p>Fish and Wildlife Habitat and Noxious Weeds Establish objectives for management activities that conserve, restore, maintain and enhance fish and wildlife habitat, control and manage noxious weeds, and restore forests and rangelands.</p> <p>Recreation Opportunity Spectrum (ROS) The following ROS classes would be available within BCAs: <ul style="list-style-type: none"> • Primitive; • Semi-Primitive Nonmotorized; • Semi-Primitive Motorized </p> <p>Off-Highway Vehicles Designated as limited or closed. Existing routes would generally be retained, but travel would be limited to existing roads, primitive roads and trails.</p> <p>Fluid Minerals Lands would be open to new leasing subject to No Surface Occupancy (NSO) stipulations.</p> <p>Rights of Way BCAs would be exclusion areas for new linear rights-of-way.</p> <p>Renewable Energy Resources BCAs would be exclusion areas for renewable energy development, such as wind and solar.</p> <p>Grazing The BCA has no effect on authorized rangeland health, standards, capacity (animal unit months - AUMs) or livestock grazing management actions and tools (e.g. fencing and watering). Locatable Minerals BCA lands are generally not intended to be withdrawn from operation of the general mining laws. Reasonable efforts will be made to reduce and reclaim surface disturbances from exploration and mining activities and prevent the fragmentation of intact habitats within</p>

	BCAs, while allowing for existing rights to be exercised.
S-0044-01	<p>While a portion of the federal minerals along the Front have been withdrawn by congressional action, some federal minerals were not subject to that withdrawal. Significant investment has been made by the US Fish and Wildlife Service, Montana Fish Wildlife and Parks, The Nature Conservancy, The Conservation Fund, other private land trusts, and numerous private landowners to protect lands on the Rocky Mountain Front for conservation purposes. More than 225,000 acres of private lands have been protected on the Front to date, through fee acquisitions or conservation easements. Some of these protected lands are underlain with federal minerals not subject to the congressional mineral withdrawal.</p> <p>These fee and conservation easement interests were acquired to protect the important biological values of these lands. These values include intact native plant grassland, wetland, riparian, and forest communities; habitat for numerous plant species of concern; and habitat for numerous wildlife species of concern such as grizzly bear, short-horned lizards, Sprague's pipit, and numerous other grassland, wetland, and forest bird species. These intact native communities and species of concern should be considered in the analysis of any leasing decisions or stipulations, and should receive special consideration and protective stipulations, especially on lands protected for conservation purposes.</p> <p>Beyond the habitat values of any specific tract, intact habitats on these lands contribute to the larger scale habitat requirements and travel routes required for species with large home ranges, including grizzly bears and ungulates such as antelope, elk, and mule deer. Mineral development could significantly fragment existing large blocks of native habitats. Cumulative effects and impacts of mineral activities at these larger scales should be addressed in the RMP as well.</p>
S-0044-03	<p>Of special note is The Nature Conservancy's Pine Butte Swamp Preserve, portions of which are underlain by federal minerals. Peat wetlands at Pine Butte support significant populations of 13 plant species of concern including <i>Braya humilis</i>, <i>Gentianopsis macounii</i>, <i>Primula incana</i>, <i>Salix serissima</i>, <i>Carex craweii</i>, <i>Eleocharis rostellata</i>, <i>Juncus acuminatus</i>, <i>Kobresia simpliciuscula</i>, <i>Trichophorum cespitosum</i>, <i>Trichophorum pumilum</i>, <i>Cinclidium stygium</i>, <i>Meesia triquetra</i>, and <i>Scorpidium scorpioides</i>. These wetlands at Pine Butte are likely the largest peatland complex in Montana. These wetlands were recently recognized by the Montana Native Plant Society as part of its Important Plant Areas Program (http://www.mtnativeplants.org/Important%20Plant%20Areas). Maintenance and protection of surface and sub-surface hydrology in and around the wetlands is crucial for maintenance of the wetland complex. These wetlands also provide critical habitat for many wildlife species, most notably the security and feeding habitat for grizzly bears. Given these significant values we believe this area should receive the highest protections possible, preferably closure to leasing or at minimum no surface occupancy.</p>
S-0044-05	<p>The Nature Conservancy is concerned that federal mineral leasing and development could have significant impacts to the surface and conservation values that have been protected on the Rocky Mountain Front. The lands on the Front contain numerous wildlife, vegetation, hydrologic, cultural and large scale habitat values that require special consideration. Decisions regarding federal minerals on the Front should offer the highest protections possible for these special values, including special protective stipulations, no surface occupancy, or closure to leasing, especially on lands where the surface has been protected for conservation purposes.</p>
S-0046-09	The Judith range is home to a rare fish..

S-0047-15	Finally, we are also concerned about sage grouse interaction with oil and gas development. There are some areas of overlap between sage priority protection areas and no surface occupancy oil and gas leases. While the NSO stipulation is a good step forward in some ways, it is concerning that more of the area is not closed to leasing. This needs to be considered since even with a no surface occupancy restriction, well pads and the associated infrastructure (such as roads and pipelines) are still built nearby. From reviewing sage grouse studies, it is clear that setbacks (which is what no surface occupancy essentially is) are just one way to address the issue. According to Oil and Gas Development and Greater Sage Grouse (<i>centrocercus urophasianus</i>): A Review of Threats and Mitigation Measures, "The focus on set-back distances provides only a finite set of options for land managers and permittees alike. Because this approach does not take into account the specific causes of sage grouse avoidance, mortality, or potential population-level effects, it is of limited effectiveness to sage grouse conservation and management. A more comprehensive approach should incorporate performance standards that are based on an understanding of specific causes and effects of oil and gas infrastructure impacts on sage grouse (i.e., noise, predation, disease), as well as consideration of habitats other than leks (i.e., nesting, brood rearing, and winter habitats). ¹⁰ "
S-0049-29	Based on the BLM's experience with grazing in the planning area, we recommend the RMP/EIS include an assessment of each alternative's potential impacts and benefits to aquatic resources, including impacts to water quality, stream and wetland processes, and fish populations/habitat.
S-0049-36	As you know, the EPA provided comments to the BLM LFO in a February 5, 2014 letter regarding the BLM's Draft RMP Amendment/EIS for the Greater Sage-Grouse. Through that review, we understood that revisions to the oil and gas leasing stipulations for greater sage-grouse protection were being deferred to the full RMP/EIS analysis (which is now being scoped) when all oil and gas leasing stipulations would be reviewed. We have enclosed our February 5, 2014 comments for your use as they pertain to the oil and gas leasing stipulations that will be assessed through this full RMP/EIS analysis.
S-0050-01	I was in the the New Year mine cave (the Crystal Cave) last summer. It is spectacular and should eventually be opened to the public. Fortunately, there are no protected bats or other wildlife residing in the mine workings or cave so we humans should be allowed to enjoy it
S-0050-02	Collar Gulch should be opened back up for vehicular public access by opening the gate. The difficult decent and poor road in itself will limit the type and amount of traffic. It seems that the fish have been well protected and after 20 years of the access being closed it should once again be available to members of the public who are not capable of hiking in by way of the Camp Maiden road or the Collar Gulch Trail system. The gulch was a favorite place for many people for many years. The old Collar Mill stone foundation and dam farther up the creek are significant historical sites. And, it's always thrilling to view the fish. Thought should also be given to possibly lifting or reducing the size of the Collar Gulch ACEC designation. Is it still necessary? The BLM should survey and mark the boundary between public lands and private property in Collar Gulch.
S-0051-01	<ul style="list-style-type: none"> • Manage vegetation with continued livestock grazing which improves habitat for sage grouse, reduces fire fuel load, and keeps viable ranches in operation. Viable ranches keep open space available for wildlife, and provide a stable economic base in small communities.
S-0051-03	<ul style="list-style-type: none"> • As in all management decisions, the LFO must be careful not to begin managing one habitat to the detriment of another or the detriment of other uses.
S-0051-04	Special Status Species: <ul style="list-style-type: none"> • As in all management decisions, the LFO must be careful not to begin managing one habitat to the detriment of another or the detriment of other uses.
S-0051-07	Forest Management <ul style="list-style-type: none"> • Manage confer encroachment in some areas to preserve open habitat and native range diversity for both livestock grazing and wildlife.
S-0051-10	Livestock Grazing <ul style="list-style-type: none"> • Maintain livestock stocking rates to benefit viable ranching operations, local economy, wildlife, and fire management.

S-0051-11	<p>Livestock Grazing</p> <ul style="list-style-type: none"> • Work with permittees to eliminate or control crested wheat grass in areas where native range grasses would better benefit livestock and wildlife. • Consider working with permittees to add watering facilities that could possibly eliminate the need for stock ponds which sometimes sour the ground below them.
S-0052-02	<p>Issue: Recreation and Visitor Services</p> <p>Prior to designating SRMAs and ERMAs that contain adjoining private land, the private landowner should be consulted. An agreement should be developed that describes the roles and responsibilities for management of the area - these should include responsibility for trash cleanup, the spread of noxious weeds, the degradation of vegetation, and the maintenance of roadways because of the area being used for recreation. As co-owner of the Vogel Dam, the Brady Ranch is concerned about the problems created by the reservoir being a public recreation site. The Ranch was not consulted prior to the area becoming a designated recreation area and has not been consulted about the stocking of fish that has been taking place. Specific problems resulting from high public visitation are driving on the spillway and dam fill - which, according to the BLM engineer, will eventually result in the failure of these structures - blocking access across the dam to the private property, vandalism and ignoring of signage placed by the property owners, driving off roadways, leaving trash, spreading weeds, fire danger, etc. These problems are as detrimental to the BLM managed property as the private property. These issues need to be addressed or the fish stocking of the Vogel Reservoir will end.</p>
S-0053-01	<p>As one of MFWP's area wildlife biologists within the area covered by the Lewistown RMP, one of the issues that I feel needs to be addressed in the RMP is dealing with conifer/juniper encroachment or invasion into areas of big sagebrush habitat, particularly in areas of occupied or potential sage grouse habitat.</p>
S-0054-01	<p>We recommend the adoption of the following measures, which are proposed for adoption in the Preferred Alternative of other BLM plan revisions or sage grouse amendments. Some of these are similar to the provisions of Alternatives B and/or C. Limit OHV use to designated roads and trails; limit to existing roads and trails pending designation in the context of a 5-year travel planning effort (North Dakota RMP Amendment, Bighorn Basin RMP Revision).</p>
S-0054-02	<p>Conduct restoration of roads not designated under travel planning (NW Colorado RMP Amendment).</p>
S-0054-03	<p>Use existing roads, or realignments as described above to access valid existing rights that are not yet developed. If valid existing rights cannot be accessed via existing roads, then build any new road constructed to the absolute minimum standard necessary. Allow no upgrading of existing routes that would change route category (road, primitive road, or trail) or capacity unless the upgrading would have minimal impact on sage-grouse habitat, is necessary for motorist safety, or eliminates the need to construct a new road. (North Dakota RMP Amendment).</p>
S-0054-04	<p>New road construction would be limited to realignments of existing roads, if that realignment has a minimal impact on greater sage-grouse habitat, eliminates the need to construct a new road, or is necessary for public safety. Incorporate BMPs. Existing roads used to access valid existing rights; if unavailable, construct to minimum standard necessary. (HiLine RMP revision, North Dakota RMP Amendment).</p>
S-0054-05	<p>Prohibit or bury powerlines within 0.6 miles of leks unless no SG declines can be demonstrated. Prohibit overhead transmission except within 0.5 mile of existing lines, corridor a maximum of 1 mile wide. Bury lines where possible. (Buffalo RMP revision).</p>
S-0054-06	<p>High-profile structures exceeding 10 feet in height, would be eliminated, designed or sited in a manner which does not impact sage grouse. Permanent (longer than 2 months) structures which create movement must be designed or sited to minimize impacts to sage grouse. (North Dakota RMP Amendment).</p>
S-0054-07	<p>Priority Habitat would be a priority in consideration of land acquisitions. Retain public ownership of PH. Consider exceptions where: There is mixed ownership, and land exchanges would allow for additional or more contiguous federal ownership patterns within the priority sage-grouse habitat area; Under priority sage-grouse habitat areas with minority federal ownership, include an additional, effective mitigation agreement for any disposal of federal land. As a final preservation measure consideration would be given to pursuing a permanent conservation easement. (North</p>

	Dakota Plan Amendments).
S-0054-08	No Surface Occupancy stipulations required for any new fluid minerals leasing, with no option for exceptions or modifications. (California-Nevada RMP Amendment).
S-0054-09	Allow only heliportable geophysical exploration, with timing limitations applied. (North Dakota RMP Amendment, Bighorn Basin RMP Revision).
S-0054-10	Apply Timing Limitation Stipulations to all Priority Habitat. (South Dakota RMP Amendment).
S-0054-11	Timing Limitations should apply to surface disturbing and disruptive activities. (Lander RMP revision).
S-0054-12	Find Priority Habitats unsuitable for coal leasing. (North Dakota RMP Amendment, HiLine RMP Revision, Northwest Colorado RMP Amendment).
S-0054-13	Close Priority Habitats to energy and non-energy leasable minerals leasing. (HiLine RMP revision, California-Nevada RMP Amendment).
S-0054-14	Close Priority Habitats to salable minerals development. (North Dakota RMP Amendment, Nevada – Northeast California RMP Amendment)
S-0054-15	Priority Habitats are exclusion areas for new renewable energy ROW permitting. (North Dakota, California-Nevada, and Idaho-Southwest Montana RMP Amendments; HiLine, Buffalo, and South Dakota RMP revisions).
S-0054-16	Maximum 25% forage utilization for livestock grazing in each grazing allotment. (North Dakota RMP Amendment).
S-0054-17	Employ herd management to minimize livestock impacts on sage grouse nesting habitat during spring. Hot season grazing does not occur on an annual basis. Adjust AUMs where sage grouse habitat objectives are not being met. Incorporate terms and conditions into grazing permits to meet sage grouse habitat objectives. (California-Nevada RMP Amendment).
S-0054-18	Incorporate sage grouse habitat objectives into permit renewals. Manage toward ecological site potential and toward reference state to achieve sage grouse objectives. (NW Colorado RMP Amendment).
S-0054-19	Design any new structural range improvements and location of supplements to conserve, enhance, or restore SG habitat through an improved grazing management system relative to SG objectives. Evaluate existing range improvements and location of supplements during AMP renewal process to make sure they conserve, enhance or restore SG habitat. (North Dakota RMP Amendment).
S-0054-20	Analyze springs, seeps, and pipelines to see if modifications are needed. (NW Colorado RMP Amendment).
S-0054-21	Grazing allotments not meeting rangeland health standards and not making progress toward this goal will be closed. (Miles City RMP revision).
S-0054-22	Develop specific objectives to conserve, enhance or restore PH based on ESDs and assessments. Implement management actions (grazing decisions, AMP/Conservation Plan development, or other plans or agreements) to modify grazing management to meet seasonal sage-grouse habitat requirements. (North Dakota RMP Amendment).
S-0054-23	Where riparian and wetland areas are already meeting standards they would be maintained in that condition or better. Where a site's capability is less than PFC, BLM would manage to achieve or move toward capability. Manage wet meadows to maintain a component of perennial forbs with diverse species richness relative to site potential (e.g., reference state) to facilitate brood rearing. Where riparian areas and wet meadows meet PFC, strive to move towards GRSR habitat objectives within capabilities of the reference state vegetation relative to the ESD. (North Dakota RMP Amendment).
S-0054-24	Do not allow vegetation treatments with a potential to adversely affect sage grouse. Retain a minimum of 70% of ecological sites capable of supporting 12% cover in Wyoming big sage or 15% cover in mountain big sage. Manage a total disturbance cap of less than 30% lands not meeting these criteria. (NW Colorado RMP Amendment).
S-0054-25	Evaluate role of existing seedings composed of introduced perennial grasses in and adjacent to Priority Habitat to determine if they should be restored to sagebrush or habitat of higher quality for sage grouse. If these seedings are part of an AMP/ Conservation Plan or if they provide value in conserving or enhancing the rest of the Priority Habitat, then no restoration would be necessary. (North Dakota RMP Amendment).

S-0054-26	Do not use fire in precipitation zones < 12", except as last resort and where conditions allow and cheatgrass is a very minor component. (NW Colorado RMP Amendment).
S-0054-27	Rest grazing allotments 3 full years following fire; utilize grazing exclosures for monitoring; grazing excluded until woody and herbaceous plants achieve SG objectives. (Bighorn Basin RMP Revision).
S-0054-28	Remove, modify, or mark fences to reduce sage grouse strikes. (Nevada – NE California RMP Amendment, NW Colorado RMP Amendment, Bighorn Basin RMP Revision, Utah RMP Amendment, North Dakota RMP Amendment).
S-0054-29	Permanent retirement of grazing allotments will be considered on a willing-permittee basis. (Bighorn Basin RMP revision, Miles City RMP revision).
S-0054-30	General Sage Grouse Habitats: Limit motorized use to existing roads and trails pending travel management planning. Complete planning within 5 years of ROD. (California-Nevada RMP Amendment, North Dakota RMP Amendment).
S-0054-31	Conduct restoration of roads, primitive roads and trails not designated in travel management plans. (North Dakota RMP Amendment).
S-0054-32	Site and/or minimize linear ROW to reduce disturbance to sagebrush habitats. Maximize placement of power lines and transportation routes in existing ROWs. Power lines would be buried, eliminated, designed or sited in a manner which does not impact SG. ROWs would be allowed with appropriate mitigation and conservation measures identified within the terms of the authorization to minimize surface disturbing and disruptive activities. Co-locate new ROWs within existing ROWs where possible. (North Dakota RMP Amendment).
S-0054-33	Exclusion area for renewable energy rights of way; allowable if co-located on industrial facilities for on-site generation. (California-Nevada RMP Amendment).
S-0054-34	Allow new routes/realignments during site-specific travel planning if it improves GRS habitat and resource conditions. Allow no upgrading of existing routes that would change route category (road, primitive road, or trail) or capacity unless the upgrading would have minimal impact on sage-grouse habitat, is necessary for motorist safety, or eliminates the need to construct a new road. (North Dakota RMP Amendment).
S-0054-35	Find unsuitable for coal surface mining. (NW Colorado RMP Amendment).
S-0054-36	High-profile structures exceeding 10 feet in height, would be eliminated, designed or sited in a manner which does not impact sage grouse. Permanent (longer than 2 months) structures which create movement must be designed or sited to minimize impacts to greater sage grouse. (North Dakota RMP Amendment).
S-0054-37	Noise limited to no more than 10 dBA above ambient, where technologically feasible. (Buffalo RMP revision).
S-0054-38	Bury new distribution lines within 1 mile of leks. (HiLine RMP revision).
S-0054-39	Avoid all new structural range developments and location of supplements (salt or protein blocks) unless independent peer-reviewed studies show that the range improvement structure or nutrient supplement placement benefits sage grouse. (North Dakota RMP Amendment).
S-0054-40	Do not use fire in precipitation zones < 12", except as last resort and where conditions allow and cheatgrass is a very minor component. (Northwest Colorado RMP Amendment).
S-0055-01	<p>In developing your new Resource Management Plan I ask you to give strong consideration to protecting areas with wilderness characteristics. Wild areas provide the best wildlife habitat, clean water, and, in my opinion, by far the best opportunity for recreation such as hiking and hunting away from the crowds.</p> <p>Please conduct wilderness inventories on all lands which may qualify for protection and on areas which contain critical wildlife habitat, historical values, and opportunities for quiet, non-motorized recreation. This should include areas that have the potential for restoration from past damage, current noxious weed infestations, or areas with illegal or damaging off road vehicle use. Prevention of further degradation and restricting further damage now, while the planning process is ongoing, is necessary.</p> <p>Given the vast expanse of the Lewistown management area, I strongly encourage you to take advantage of wild land inventories done by non-governmental groups, such as the Montana Wilderness Association.</p>

S-0055-02	I realize that development for industrial use is a legitimate use of our public land. With the vast amount of land already developed, I'd like to see future development limited to areas that do not abut critical wildlife habitat and do not affect the potential for primitive, non-motorized recreation.
S-0056-05	As organizations with a vested interest in continuing the longstanding partnership between federal land agencies and the sportsmen's community, we encourage the Lewistown Field Office to revise its Resource Management Plan consistent with the spirit of the Federal Lands Hunting, Fishing and Shooting Sports Roundtable Memorandum of Understanding (MOU). By signing this document, BLM has agreed to work with private organizations to facilitate appropriate collaborative opportunities to improve access and target ranges on public lands. Additionally, BLM has also agreed to assist in addressing issues regarding hunting, fishing and shooting sports activities on federal lands, such as those managed by the Lewistown Field Office. Consistent with the spirit of the MOU, we stand ready to assist the Field Office in proactively addressing concerns that may arise during the scoping process in order to maintain access for hunting, fishing and recreational shooting and aid in the development of reasonable planning alternatives which are mutually agreeable to BLM, the sportsmen's community and the public.
S-0057-01	<p>A habitat of special note that should be considered in the RMP is the low elevation limber pine savanna at the mountain/grassland interface along the Rocky Mountain Front. These limber pine stands provide important habitat for grizzly bears, big game winter range, and numerous bird species of concern. Many of these limber pine stands also contain significant old growth, which developed under the influence of both fire and large ungulate grazing. I have attached a report on the fire history in limber pine communities from Pine Butte Preserve that may be useful for your analysis.</p> <p>The unique values of these limber pine communities should be considered when developing management guidelines and direction in the RMP. BLM lands that support limber pine stands include the existing ONAs on the Front, BLM lands along Birch Creek, and BLM lands north of the Sun River and west of Tunnel Lake. In my experience, the limber pine stands west of Tunnel Lake are particularly notable for their relatively open character and extensive old growth component.</p>
S-0058-04	We would urge BLM to consider wildlife corridors, wilderness inventories and other data when creating management plans for the Monument area (ie the Lewistown Field Office). Please consider using the Rapid Ecoregional Assessment for the Northwestern Plains (whenever it's released) to inform yourselves where the important linkages are and to protect these lands appropriately.
S-0058-06	<p>We would like BLM to identify places where industrial activities like oil and gas wells, pipelines, wind farms, and mines will have the least impact, and to direct development there.</p> <p>We would also urge you to prepare a Master Leasing plan for any areas in the Field Office where oil/gas potential and wilderness characteristics or critical sage-grouse habitat overlap.</p>

S-0059-18	<p>Master Lease Plans are a new and effective method of resolving conflict in areas of competing interests and uses. This field office has many areas that have competing and conflicting interests and an MLP could adequately address them. The current resources we see that are in conflict include: greater sage-grouse, lands with wilderness characteristics, hunting and fishing, and oil and gas development. Not all of those interests are in direct conflict with each other. However, based on fluid minerals, wildlife data, and potential lands with wilderness characteristics, we would like to nominate the following regions:</p> <ul style="list-style-type: none"> · Southeast in the planning unit. This is the area south of Highway 200 and east of Highway 87. This includes the Elk Creek PLWC, Pike Creek PLWC, Cemetary Road PLWC, Cat Creek PLWC, and Cottonwood Creek PLWC units. This area has high conflict between recreational opportunities and oil and gas development. · Northcentral in the planning unit. This is the area north of Winifred including Chimney Bend PLWC, Woodhawk Creek PLWC, Dry Armells PLWC, and Armell's Creek PLWC. This region has high conflict between wildlife and habitat and oil and gas, and oil and gas development and recreational opportunities. · Western portion of the unit along the Rocky Mountain Front. This area includes Blind Horse Creek PLWC, Ear Mountain PLWC, Chute Mountain PLWC, Deep/Battle Creek PLWC, Beaver Meadows PLWC and the North Fork of the Sun River WSA. This has high conflict between oil and gas development and wildlife habitat, and oil and gas development and recreational opportunities.
S-0060-01	<p>Increasing demands for energy and other resources, fragmentation of habitats from new roads, the increasing threat of uncharacteristic wildfires, invasive species, and contentious political debates indicate that a backcountry focused land use planning tool is needed in the Lewistown RMP. This tool should recognize and give attention to important wildlife habitat and valued "backcountry" lands, and be applied with a strong restoration emphasis to address modern management challenges.</p>
S-0066-01	<p>The first issue to be addressed is Public Safety! This has to do with a piece of BLM land that dissects deeded lands, a county road splits this north and south. We have been here almost 30 years, with little or no problems. In the past 5 years however, problems have escalated into nightmares - loss of livestock due to gunshot (documented by the Montana Dept. of Livestock, constant trespass of deeded lands, hunter/hunter conflicts, wildlife & livestock harassment, hunter/landowner conflicts and miles of extra fence repair. Our ranch headquarters are within ½ mile of this conflict area causing concern for our own safety! Also the garbage is of concern. There are also law inforcement/landowner confrontation which was documented and vindicated.</p>
S-0068-01	<p>"Issues for this parcel: ORV use, erosion of former logging roads, noxious weeds, conflicts with bears and subdivision development to the south (Elk Meadows)" Comment noted on map of the planning area at a public scoping meeting; BLM parcel close or adjacent to Highway 200 approximately 6 miles south of Dearborn River.</p>
S-0069-01	<p>Although the BLM land in our pasture can't be fenced because of the roughness of the Missouri River Breaks area, we take care of it the same as for our own pasture. We do not overgraze our pasture. Fewer cattle are pastured in a dry year. It is a fact that grazing makes healthier grass not only for cattle but also for wildlife. The fuel for wildfires is greatly reduced. We provide water sources for our cattle and wildlife also benefits. In other words, we manage this environment to be productive and the Federal government has an income from BLM land. If cattle grazing should be reduced, wildlife will certainly suffer, and probably move to other areas.</p>
S-0072-02	<p>Maintaining and improving wildlife habitat and restoring degraded range conditions should be reflected in the purpose and need for the LRMP in compliance with both the Taylor Grazing Act of 1934, the Federal Lands Policy Management Act (FLPMA) of 1976, and other laws that govern livestock management on public lands.</p>

S-0072-03	Thus, the reason for addressing livestock grazing in the LRMP is to improve the range condition of the allotments within the project area and to maintain and improve wildlife habitat. This direction, based on laws and regulations, should be explicitly stated in the "Purpose and Need for the Plan" in the DEIS. Furthermore, the selection of any alternative in the DEIS that does not provide direction for meeting those goals violates the intent of the laws and regulations that govern public land management.
S-0072-04	The purpose and need section of the DEIS should include the need to conserve all wildlife habitat and restoration of degraded range conditions as a purpose of the document.
S-0072-06	In regards to livestock grazing generally, Western Watersheds Project urges the BLM to incorporate the following in the LRMP: Specific measurable terms and conditions for livestock grazing in riparian areas, uplands, and wildlife and fisheries habitat, including: (i) a minimum of 7" stubble height remaining on hydric soils riparian greenlines after livestock grazing (ii) a 10% maximum annual bank or wetland alteration from all sources for streams and wetland hydric and mesic soil areas of upland seeps, springs, wet meadows and aspen clones (iii) a maximum annual woody browse utilization by all browsing ungulates of 15% on cottonwood, aspen, woody shrub, and willows (iv) a maximum annual grazing utilization of perennial grass species on upland landscapes by all grazer of 35% (v) a minimum 9" residual perennial native grass cover for ground-nesting birds like sage-grouse and sharp-tailed grouse.
S-0072-08	The BLM must scientifically and accurately determine those lands which are capable and suitable for livestock grazing. The BLM must also accurately and quantitatively determine how much forage (i.e. forage capacity) is currently available. Additionally, the BLM must properly allocate that forage to watershed and stream protection, wildlife habitat and food, then to livestock if available.
S-0072-14	The most effective way to protect and restore lands in the planning area would be the elimination of cattle from the landscape, and allow limited the amount of browsing in the area to that by wildlife. Stating that stricter standards will improve range in declining condition is not only a failure to disclose impacts, but it ignores the real problem. In numerous studies of riparian grazing impacts, investigators concluded that total removal of livestock was necessary to restore ecosystem health.
S-0072-16	In spite of the evidence of widespread loss of plant productivity and ground cover, accelerated erosion and BLM's own documentation of rapid declines in species such as sage-grouse, BLM routinely chooses not to address livestock impacts in any scientific or sustainable fashion. The LRMP must acknowledge the negative impacts of livestock grazing and propose significant grazing reductions to address these impacts.
S-0072-18	Furthermore, Bock et al. reviewed the effect of grazing on Neotropical migratory landbirds in three ecosystem types, and found an increasingly negative effect on abundances of bird species in grassland, riparian woodland, and Intermountain shrubsteppe (almost equal numbers of species with positive and negative responses to grazing in grassland; six times as many with negative as positive responses in shrubsteppe), but impacts to these species are lacking in the DEIS.
S-0072-19	Since sagebrush communities on private lands have been converted to agricultural or other uses or are not being managed in a manner compatible with sagebrush dependent wildlife, the importance of maintaining the integrity of sagebrush habitats on BLM lands within the planning area to provide taller, denser stands for mule deer, pronghorn, and sage-grouse is extremely important. For example, big sagebrush canopy cover values on undisturbed relicts and kipukas does not support the assertions by the BLM that big sagebrush canopy cover increases due to livestock grazing. ⁴¹ In fact, the just cited researchers found the following: · Big sagebrush canopy cover was higher inside grazing exclosures and was decreased outside exclosures, · Perennial grasses and sagebrush canopy cover were significantly higher in ungrazed vs. grazed plots,

	· After grazing had been removed big sagebrush canopy cover and grass cover increased significantly.
S-0072-21	The 2012 Montana Fish, Wildlife, and Parks (“MTFWP”) counts for the eastern Montana Sage-grouse Management Zone are only 64.9% of the long term average. Across Montana, sage-grouse numbers have declined by more than half since 1980. Furthermore, hunter harvest estimates have declined even further, dropping from 40,000 birds in 1984 to less than 5,000 in 2011. This represents an 87.5% decline in hunter harvest across the State. Please review and share this important sage-grouse data in the final EIS. If you have more site specific information relevant to sage-grouse trends and habitat conditions within the planning area, please reveal it in the DEIS as well.
S-0072-22	Grazing across many of the Great Basin states has led to the invasion of cheatgrass, a highly flammable noxious weed that accelerates the fire cycle to less than five years destroying the sagebrush upon which sage-grouse rely for food and cover. Approximately 36 percent of the Greater Sage-Grouse range is invaded by cheatgrass. Because sagebrush requires at least 15 years (and up to 50) to reoccupy burned sites, restoring invades areas is a difficult and slow process. Preventing further spread into intact sagebrush should be prioritized.
S-0072-24	Antelope are also negatively impacted by livestock and livestock-related fencing. Fences or fragment antelope habitat. Fences pose a serious challenge and create a number of problems for antelope. Fences can disrupt antelope escape strategies by confusing them, forcing them to slow down, change routes and congregate, in particular in fence corners. BLM must consider the removal of fences on pronghorn habitat within the planning area. Livestock use and presence can also significantly impact pronghorn habitat and behavior.
S-0072-25	The DEIS should discuss in detail the vast array of livestock diseases that can significantly harm if not kill native wildlife. Bighorn sheep in particular are extremely susceptible to livestock diseases carried by domestic sheep and goats, which are often asymptomatic to these same diseases. <i>Pasteurella pneumonia</i> and lung worm in particular are spread by domestic sheep.
S-0072-26	Additionally, any analysis of grazing is incomplete without a discussion of the effect the practice has had on predators. The most vehement opposition to wolves, bears, and other predators comes from the livestock industry, and is one of the main reasons some of the species are now listed. Predators perform important top-down ecological functions, yet they are consistently eradicated and heavily managed in order to protect livestock on public land, costing taxpayers millions of dollars. The DEIS must include an analysis of the impacts from livestock grazing on predators in the planning area.
S-0072-29	The NEPA documents should review the changes that are likely to occur in the project area due to global climate change over the 10-year period of the proposed permit. While uncertainties remain regarding the timing and extent of impacts from climate change, modeling indicates that on average, Montana will likely experience higher temperatures in all seasons; longer dry periods; heavy precipitation events; more frequent droughts; and increased wildfire risk. These changes will affect the landscape of planning area, especially riparian and water resources and the species that depend on them as well as the amount and availability of forage. Landscapes that are less fragmented provide greater opportunity for species to shift ranges without being blocked (Opdam and Wascher, 2004). Fragmentation of the landscape through vegetation removal or grazing infrastructure such as fencing exacerbates the challenges that species are already dealing with in trying to adapt to a changing climatic regime. Removing or reducing livestock would both alleviate a widely recognized and long-term stressor and make these public lands less susceptible to the effects of climate change (Beschta et al., 2012 ⁷⁸).
S-0072-32	The administrative costs of public lands grazing are often underestimated in BLM planning documents. Considering only direct costs, BLM range management costs in 2011 totaled \$77.3 million, while income from grazing fees was only \$4.5 million, leaving a net deficit to the U.S. Treasury was \$72.8 million. This loss on federal grazing programs fails to consider indirect costs, such as administration of the range program. Estimates of those indirect costs rise well over \$100 million. The economic calculations in the DEIS should not ignore potential administrative cost savings from reduced grazing. Decreased grazing would save the BLM costs associated with environmental analysis, litigation, grazing permit administration, predator control, weed spraying, and costly efforts to preserve species harmed by grazing.

S-0072-34	<p>The LRMP must address the costs of environmental degradation. The value lost from negative environmental impacts to water quality and quantity, aquatic species habitat, riparian and upland wildlife habitat quality and quantity, and native vegetation should be calculated. The DEIS must also address the potential for further exotic species and weed expansions, the costs associated with weeds and flammable invasive species, and the resulting potential for species loss. The viability of wildlife and rare plant populations and the cost to protect and preserve them in the face of chronic grazing degradation demands BLM's attention. If the BLM is to rise to its calling as land administrator for the public, the beauty and intrinsic value of the land, as described by Aldo Leopold, must also be addressed.</p>
S-0072-35	<p>In accordance with its multiple use mission, the BLM must consider land uses other than grazing in its calculation of the economic and social values of each alternative, including administrative costs and environmental impacts to water, wildlife, plants, recreation, potential species loss, intrinsic land value, and beauty. Under the Taylor Grazing Act, the BLM must prevent injury to public lands. The current grazing utilization levels are unsustainable and the proposed plan must not continue grazing at unsustainable levels. Restoration of the land will require costly action by the BLM. Taking into account the overestimated costs and underestimated benefits of reducing grazing in the planning area, the BLM must provide a thorough and balanced analysis that considers the factors addressed in this comment.</p>
S-0072-37	<p>The National Environmental Policy Act ("NEPA") requires that the BLM consider a reasonable range of alternatives. See 42 U.S.C. § 4332(2)(C)(iii). Considering the presence of endangered, special status, and sensitive species in the planning area, a no grazing alternative and 50% reduction in permitted grazing should be included within the reasonable range of alternatives for the LRMP.</p>
S-0072-38	<p>The Society for Range Management (SRM) in 1974 defined an Animal Unit "to be one mature (1000 lb.) cow or the equivalent based upon average daily forage consumption of 26 lbs. dry matter per day." SRM also defined an Animal Unit Month as "The amount of feed or forage required by an animal-unit for one month." NRCS defined the forage demand for a 1,000 pound cow as 26 pounds of oven-dry weight or 30 pounds air-dry weight of forage per day. It is important to ensure that forage consumption rates by livestock are based on the size of animals present on the allotment and a reasoned estimate of their daily consumption rates. The following analysis provides some background and justifies a more current forage consumption rate for cow/calf pairs. It is BLM's obligation to ensure this forage is accurately accounted for as this is its fiduciary duty to the American People. Undercounting forage consumption by livestock results in undercharging for that forage. This is potentially defrauding the American public under the False Claims Act. Forage consumption rates must be calculated based on the current weights and consumption rates of livestock in order to provide the forage needed for wildlife, plant community sustainability and watershed protection and to ensure the public trust is not violated by undercharging for the actual weights of cattle and calves grazed.</p> <p>The current RMP authorizes a certain number of AUM's. However, that is based on an AUM equivalent to 800 lbs of forage per month. The most current information, reviewed above shows that number to be 1368 lbs/month per AUM. Therefore, if sufficient forage were available to satisfy all needs, the numbers of livestock grazed should be reduced to account for the increases in weight and correct the erroneous assumption that 800 lbs/month is an accurate consumption figure. Using the ratio between the current RMP's forage amount per AUM divided by the correct figure above, gives a needed reduction in permitted numbers and/or seasons of use of 42% to account for the RMP's understated forage consumption, without accounting for wildlife, plant and watershed needs. The BLM can not just assume that an AUM is 800 lbs of forage consumption per month. The RMP/EIS must analyze the current and potentially available forage to satisfy the forage consumption by the number of livestock it currently permits or proposes to permit. It can not assume that the forage capacity determined 20-40 years ago is applicable today.</p>

S-0072-39	<p>Because of economic pressures and uncertainty, many ranchers in the West would like to voluntarily retire their grazing permits, and the LRMP and Final EIS should grant ranchers the freedom to retire their permits if voluntarily waived to the BLM. Voluntary grazing permit retirement would offer permittees a new economic opportunity while providing protection and restoration for the land managed by the Lewistown and Butte BLM offices. All alternatives analyzed in the DEIS and the chosen alternative for the LRMP need to include specific direction and language authorizing the permanent retirement of voluntarily waived BLM grazing permits. Suggested language for authorizations is as follows:</p> <p>Grazing privileges that are lost, relinquished, canceled, or have base property sold without transfer would have attached AUMs held for watershed protection and wildlife habitat. (Adapted from the Challis Resource Area Proposed LRMP and Final EIS, October 1998, p. 87).</p>
S-0073-01	<p>The revised RMP should incorporate the Conservation Agreement and provide for the protection Westslope cutthroat trout, including conservation populations as well as drainages that are suitable for restoration and reintroduction of Westslope cutthroat trout.</p>
S-0073-02	<p>The environmental analysis would benefit from a review of the current distribution of all conservation populations of Westslope cutthroat trout in the planning area, as well as drainages suitable for restoration and reintroduction of Westslope cutthroat trout. To facilitate this evaluation, the document Westslope Cutthroat Trout (<i>Oncorhynchus clarki lewisi</i>) in Northcentral Montana: Status and Restoration Strategies (2000)² should be incorporated to the extent applicable, as well as updated data relative to the distribution of Westslope cutthroat trout.</p>
S-0073-03	<p>Stipulations need to be developed to protect remaining populations of native trout in the planning area from the impacts of oil and gas activities. We recommend that, similar to the Butte Field Office, a ½ mile No Surface Occupancy (NSO) stipulation apply to streams with conservation populations of Westslope cutthroat trout. Additionally, the Butte Field Office includes ½ mile NSO buffer for streams with the potential for reintroduction of cutthroat trout. MTU suggests that the Lewistown Field Office incorporate similar stipulation in order to protect future restoration opportunities and to ensure consistency between sister field offices.</p>
S-0073-04	<p>Collar Gulch Creek currently supports an at-risk population of genetically pure Westslope cutthroat trout that represent the eastern-most population of Westslope cutthroat trout. Given the size of this population and the limited amount of available habitat, this unique population is at risk for extirpation and any habitat degradation – or risk of degradation – is unacceptable. For this reason, MTU request that all BLM lands and subsurface minerals within the entire Collar Creek watershed be designated as an ACEC. We also request that these lands be strictly managed for non-degradation, including closing the ACEC to oil and gas leasing, mineral activity and other uses that could result in the degradation of water quality or other impacts to this irreplaceable population of native trout.</p>
S-0073-05	<p>The impact of oil and gas activities on Blue Ribbon and Red Ribbon (Class I and II) trout streams and the significant recreational benefits these waters provide anglers should be analyzed. Class I and II streams in the Lewistown Field Office include Big Spring Creek, Missouri River and the Smith River.</p>
S-0073-06	<p>MTU request that the BLM develop stipulations for oil and gas activities that protect health of Class I and II streams, as well as the quality of experience for anglers who frequent these destination fisheries. For instance, the Billings Field Office is considering the application of ½ mile NSO stipulations for both Class I and II streams. In order to protect water quality and the quality of experience that these streams provide, we request that the Lewistown Field Office adopt the same level of protection.</p>

S-0073--07	MTU supports a ¼ mile NSO buffer for all perennial streams. Doing so would protect tributary streams that serve as spawning habitat for Class I and II streams, as well as productive trout streams that are not designated Class I or II (e.g. the Sun and Dearborn Rivers.) The effects of oil and gas development along tributaries stream can be just as harmful as the effects of the designated stream sections; after all, sediment and spills flow downstream. The only way to truly protect a fishery is to protect the entire watershed, including tributaries. Moreover, there are important warm water fisheries that might not be significant recreationally, but that have biological importance. Without a buffer for all perennial streams, these resources would lack a significant degree of protection.
S-0073-08	Any exceptions, modifications or waivers to stipulations must have concurrence with Montana Fish Wildlife and Parks. Given that BLM is the land manager, but that Fish Wildlife and Parks manages fish and wildlife resources, it is imperative that the agency responsible for managing the resource concur with any determination that a lease exception, modification, or waiver will not adversely affect the resource.
S-0073-10	The environmental analysis should identify the potential impacts oil and gas development will have on fisheries, including conservation populations of Westslope cutthroat trout, impacts to streams with potential for the restoration and reintroduction of Westslope cutthroat trout, and impacts to Class I and II streams. Additionally, this analysis needs to consider that there are two potential sources of impacts from oil and gas development: 1) surface disturbances and associated erosion and sedimentation, and 2) contamination from spills and other accidental releases of chemicals and wastes associated with drilling and production and activities. Any development within a watershed introduces the risk of a spill and the resultant impacts to aquatic habitat and fisheries; these impacts can range from minimal to catastrophic depending on the severity of a given spill. The dual nature of oil and gas impacts (sediment and spills) emphasizes the need for ½ mile NSO stream buffers – the greater the spatial separation between oil and gas development and surface waters, the less chance that a spill will reach and impact a given water body.
S-0073-11	Streams and rivers throughout Montana have experienced deleterious impacts to the aquatic environment in recent drought years due to low stream flows, increased water temperatures, and/or inadequate over-wintering habitat. The environmental analysis should consider the cumulative effects of climate change and drought, including aquatic ecosystems that will be adversely impacted by climate change. By removing other stressors, vulnerable watersheds can be managed to prevent regime shifts brought on by the impacts of climate change. Reducing the effects of land use activities (e.g. applying a ½ mile NSO buffer) will help to offset the effects of climate change by increasing the resiliency of watersheds that support coldwater fisheries. Conversely, management decisions that result in a higher degree of impacts will intensify the effects of climate change.
S-0073-12	As part of the planning process, we suggest that the BLM evaluate areas of public land that are generally intact, undeveloped and that provide high quality fish and wildlife habitat. For lands that meet these criteria, we ask that the BLM allocate or consider designating these lands as “backcountry conservation areas” (BCA) in order to conserve and restore unfragmented fish and wildlife habitat and dispersed hunting and fishing opportunities. Also, we ask that you consider nominations from the public, both for areas that should be allocated as BCAs and appropriate management prescriptions.
S-0074-03	Give special consideration to conserving land near existing wildlife refuges or protected areas, such as the CMR National Wildlife Refuge, public lands included in the proposed Rocky Mountain Front Heritage Act, and all other areas that provide critical wildlife habitat.
S-0086-08	Special Status Species: BLM states under its Preliminary Planning Considerations, "conservation measures described in the Greater Sage Grouse RMP amendment EA will be incorporated upon completion." As explained in our comments on the GRSG amendment EA (attached), the management strategies outlined in the EA far exceed what is needed to ensure sufficient regulatory mechanisms will exist in the future. Of primary concern is that implementation of the EA's Preferred Alternative would severely inhibit BLM's statutory mission and seriously compromise land users' ability to continue historic uses of public lands. While we supported the Lewistown FO's intention to maintain site-specific flexibility when utilizing the RDFs outlined in Appendix D of the EA, we remain concerned and object that many of these requirements are overly prescriptive, have no scientific basis and reflect a lack of understanding valid existing rights,

	<p>operational considerations and technical feasibility. The primary reason for these excessive strategies is due to serious flaws in the data relied upon in the planning documents, which were discussed in detail in our comments on the EA.</p> <p>We reiterate that neither NEPA nor the Endangered Species Act (ESA) amend or alter the agency's statutory mission of multiple-use. Nor can this plan revision impact valid existing rights. Any process established for managing GRS habitat must not conflict with BLM's duties and authorities under FLPMA and the Mineral Leasing Act.</p>
S-0086-09	<p>In addition, we recommend that for other species, BLM ensure its management objectives and methods are consistent with those of the US Fish and Wildlife Service (USFWS). Specifically, management for species not listed as threatened or endangered must not exceed that which is recommended by the Service. An example would be the Mountain Plover. In May 2011, the USFWS determined that listing the mountain plover under the ESA was not warranted, estimating that "the current mountain plover breeding population to be over 20,000 birds, more than double the estimate cited in [its] 2002 proposal."¹ In addition, the Service concluded that "despite the prevalence of energy development activities throughout the range of the mountain plover, there is little evidence as to whether, or to what extent, the overall effects of energy development are detrimental to mountain plover (Andres and Stone 2009, p. 25). Although oil and gas field development modifies and fragments nesting, brood rearing, and foraging habitats, mountain plover continue to use these areas (Smith and Keinath 2004, p. 36; Carr-, in review)" 76 FR 27782. As such, prohibiting fluid mineral leasing or adding NSO stipulations in the planning area to protect the plover would fail to correspond with the FWS' listing determination for the species and would not be justified through any peer-reviewed science since that decision was made. Any NSO stipulations proposed for oil and gas leasing in areas within habitat of unlisted species would be arbitrary and capricious.</p>
S-0087-03	<p>The Tribes does support vast open space and landscapes that support abundant populations of native fish, wildlife, and plant species.</p>
S-0087-04	<p>we would like the BLM to establish goals and objectives for: 1) government to government consultation with the Tribes, 2) ensuring management actions are consistent with Treaty Rights retained by the Tribes, and 3) how to maintain or increase open space and actions that promote high quality habitat for native fish, wildlife, and plant communities.</p>
S-0087-05	<p>We would also like the BLM to develop goals and objectives that allow buffalo expansion and population recovery of sage grouse and other special status species on public lands within the planning area.</p>
S-0087-06	<p>We are also greatly concerned with the impacts of climate change and how federal land management actions may be contributing to climate change. Not only does the development of solid minerals, fluid minerals, and energy fragmentation and reduce habitat for wildlife, fish, and native plants, this type of development can contribute to climate change. For example, native plant communities are known to sequester carbon and ameliorate climate. Surface disturbance and occupancy reduces the ability of native plant communities to provide climate regulating ecosystem services. Emissions that result for fluid minerals contributes directly to climate change through increased radiant forcing. Although, these types of actions may seem limited to the region the effects of climate change impact the globe. Therefore, we do not support actions posed by the BLM that contribute to positive radiant forcing. We do support actions that help mitigate the effects of climate change. For example, establishing management actions and objectives to promote climate regulating ecosystem services and maintenance and enhancement of large landscapes dominated by native vegetation. To better help you understand our position on climate change we have attached our Climate Change Policy.</p>

LIVESTOCK GRAZING (LG)

COMMENT NUMBERS	COMMENTS RELATED TO LIVESTOCK GRAZING (LG)
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S-0001-01	Stop all grazing of cattle on these lands.
S-0001-02	Taxpayers have been ripped off for almost a hundred years by robber baron cattle ranchers who pay cheap cheap rates for using American lands. They should have to go rent the private lands and pay the rates that are usual and customary. BLM gives these robber baron cattle ranchers cheap rates, to cheat the average American.
S-0007-02	Having canoed the Missouri River numerous times since 1979, I am concerned about cottonwood regeneration, invasion of noxious weeds, loss of solitude and quiet, destruction of riparian habitat by motorized travel, (air, land and water) and livestock use.
S-0013-04	ISSUE ZERO GRAZING PERMITS TO ROBBER BARON CATTLE RANCHERS, WHO GET THESE CHEAP CHEAP GRAZING PERMITS AND THEN LEAVE THE LAND TOTALLY DESTROYED. CATTLE BRING ON GLOBAL WARMING AND IT IS TIME TO BAN ALL CATTLE ON THESE LANDS.
S-0013-05	THE ROBBER BARON CATTLE RANCDHERS ARE LEACHING ON EVERY CITIZEN IN AMERICA BY PAYING SUCH CHEAP RATES. THEY PAY LESS THAN 1/10 OF WHAT RENTING PRIVATE LAND COSTS. BLM NEEDS TO STOP LETTING US CITIZENS BE RIPPED OFF BY THESE LEACHING RANCHERS.
S-0034-55	Agencies are encouraged to avoid trail closures associated with other actions including timber sales, mining, and livestock grazing. Corrective action should be taken where trail closures in the past have resulted from these sorts of past actions. Loss of motorized trails because of past timber sales should be mitigated by connecting old and new travelways to create looped trail systems.
S-0043-01	Vegetation and Plant Community Health and Diversity 1) Protection and restoration of woody draws. These relatively uncommon plant community features are disproportionately used by wintering big game and are essential as wintering sharptail grouse habitat. Livestock grazing has led to reduction of this habitat feature or its health on the RMP landscapes. Plant components of this feature are in poor vigor and often lack sufficient regeneration. The RMP must resolve how this important vegetative component will be protected and restored.
S-0043-02	Vegetation and Plant Community Health and Diversity 2) Protection and restoration of riparian areas. These plant communities are disproportionately grazed by livestock and are often dramatically altered negatively as wildlife habitat. Most of the RMP hunted species depend substantially on riparian areas as habitat. Riparian areas comprise minor percentages of the RMP but are among the most abused from livestock grazing. The RMP must protect and restore all riparian areas. The RMP must resolve adverse effects of disproportionately heavy grazing occurring and the effects of that grazing on riparian vegetative health and vigor.
S-0043-03	Vegetation and Plant Community Health and Diversity 3) Manage for vegetative health and diversity on upland sites. Cattle grazing systems are commonly developed to, under the best of management, to improve the conditions of grasses as opposed to shrubs and forbs. The effect of these grass-oriented grazing systems is the reduction of shrubs and forbs important to wildlife as forage, cover, and nesting cover. Residual plant cover assures insect production and diversity as critical gamebird brood food source. We request the RMP address upland vegetative diversity and health through direction for grazing plan designs, monitoring and inventories.
S-0048-02	My Secondary Concerns: (Wilderness Characteristics and Livestock Grazing) - I note that the Bureau of Land Management lands adjoining and within the immediate vicinity of my private land have been identified by the agency as having potential wildlife characteristics. Indeed, the area has exceptional wildlife. The burgeoning numbers of elk, mule deer, sharp-tailed grouse and turkeys - just to name a few species- are ample evidence of this. However, regardless of the abundance of wildlife in this area, any Resource Management Plan must also provide for other long-standing and beneficial multiple uses in this portion of Northeast Fergus County- primarily livestock grazing, hunting and recreational access.

S-0049-28	The EPA recommends that the RMP/EIS include a summary description of the types of impacts that may result from grazing to wetlands and associated springs. Such impacts may include functional conversion of wetlands (e.g., forested to shrub-scrub); changes to supporting wetland hydrology (e.g., snow melt patterns, sheet flow, and groundwater hydrology); and wetland disturbance. With respect to grazing, we also recommend that the RMP/EIS describe how the BLM intends "to minimize the destruction, loss or degradation of wetlands, and to preserve and enhance the natural and beneficial values of wetlands" as described in Executive Order (EO) 11990, Protection of Wetlands.
S-0049-29	Based on the BLM's experience with grazing in the planning area, we recommend the RMP/EIS include an assessment of each alternative's potential impacts and benefits to aquatic resources, including impacts to water quality, stream and wetland processes, and fish populations/habitat.
S-0049-30	We recommend that the RMP/EIS include a list of potential mitigation measures with consideration of the following: <ul style="list-style-type: none"> • Special protections, such as buffer zones, for high quality riparian and wetland resources including springs and fens. • Management to limit deposition of animal waste in and adjacent to water bodies, such as protecting or repairing any existing exclusions and providing upland water developments and development of new range improvements to discourage congregation near water bodies. • Enhanced monitoring of resource conditions adjacent to high value water resources. • Monitoring to assess effectiveness of range improvements in protecting aquatic resources.
S-0049-31	We recommend the RMP/EIS identify the features of an effective adaptive management plan, including the following: <ul style="list-style-type: none"> • Achievable and measurable objectives to provide accountability and guide future decisions; • Specific decision thresholds with identified indicators for each impacted resource; • Targets that specify a desired future condition; • Commitment to implement a monitoring plan with protocols to assess whether thresholds are being met; • Commitment to use monitoring results to modify management strategies as necessary; and • Designated timeframes for completion of necessary management modifications.
S-0049-32	In addition, since the planning area is susceptible to periods of drought, we recommend the RMP/EIS include a list of potential grazing strategies for use during periodic droughts that will maintain vegetation and aquatic resources in their desired conditions.
S-0049-33	The NOI indicates that the RMP/EIS process will incorporate BLM's Standards for Rangeland Health and Guidelines for Livestock Grazing Management. We recommend the RMP/EIS include discussion of monitoring requirements that will be applied at the project level to ensure that these standards and guidelines are being met. An explanation would be helpful regarding how the Annual Operating Instructions will ensure compliance with project level monitoring requirements for parameters such as water quality. <p>To help evaluate and adjust grazing management strategies, the EPA also recommends that the RMP/EIS include a monitoring section that describes how monitoring will be implemented on an allotment level and at the watershed or sub-watershed level to determine rangeland condition (including water quality) status and trends.</p>
S-0051-01	<ul style="list-style-type: none"> • Manage conifer encroachment to improve range biodiversity and help control wild fire. • Sage brush management is needed at times when it becomes a monoculture and crowds out native range biodiversity. • Manage vegetation with continued livestock grazing which improves habitat for sage grouse, reduces fire fuel load, and keeps viable ranches in operation. Viable ranches keep open space available for wildlife, and provide a stable economic base in small communities. • Use available scientific and local monitoring data along with "on the ground" common sense information when making decisions on riparian health, landscapes, and resources.
S-0051-07	<ul style="list-style-type: none"> • Manage conifer encroachment in some areas to preserve open habitat and native range diversity for both livestock grazing and wildlife. • Work in conjunction with other landowners and agencies for desired management.

S-0051-10	<ul style="list-style-type: none"> • Maintain livestock stocking rates to benefit viable ranching operations, local economy, wildlife, and fire management.
S-0051-11	<ul style="list-style-type: none"> • Work with permittees to eliminate or control crested wheat grass in areas where native range grasses would better benefit livestock and wildlife. • Consider working with permittees to add watering facilities that could possibly eliminate the need for stock ponds which sometimes sour the ground below them. • Work with permittees to add flexibility to grazing plans which could add diversity and management options benefiting both the operation and the resource.
S-0054-16	Maximum 25% forage utilization for livestock grazing in each grazing allotment. (North Dakota RMP Amendment).
S-0054-17	Employ herd management to minimize livestock impacts on sage grouse nesting habitat during spring. Hot season grazing does not occur on an annual basis. Adjust AUMs where sage grouse habitat objectives are not being met. Incorporate terms and conditions into grazing permits to meet sage grouse habitat objectives. (California-Nevada RMP Amendment).
S-0054-18	Incorporate sage grouse habitat objectives into permit renewals. Manage toward ecological site potential and toward reference state to achieve sage grouse objectives.
S-0054-19	Design any new structural range improvements and location of supplements to conserve, enhance, or restore SG habitat through an improved grazing management system relative to SG objectives. Evaluate existing range improvements and location of supplements during AMP renewal process to make sure they conserve, enhance or restore SG habitat. (North Dakota RMP Amendment).
S-0054-20	Analyze springs, seeps, and pipelines to see if modifications are needed. (NW Colorado RMP Amendment).
S-0054-21	Grazing allotments not meeting rangeland health standards and not making progress toward this goal will be closed. (Miles City RMP revision).
S-0054-22	Develop specific objectives to conserve, enhance or restore PH based on ESDs and assessments. Implement management actions (grazing decisions, AMP/Conservation Plan development, or other plans or agreements) to modify grazing management to meet seasonal sage-grouse habitat requirements. (North Dakota RMP Amendment).
S-0054-27	Rest grazing allotments 3 full years following fire; utilize grazing exclosures for monitoring; grazing excluded until woody and herbaceous plants achieve SG objectives. (Bighorn Basin RMP Revision).
S-0054-28	Remove, modify, or mark fences to reduce sage grouse strikes. (Nevada – NE California RMP Amendment, NW Colorado RMP Amendment, Bighorn Basin RMP Revision, Utah RMP Amendment, North Dakota RMP Amendment).
S-0054-29	Permanent retirement of grazing allotments will be considered on a willing-permittee basis. (Bighorn Basin RMP revision, Miles City RMP revision).
S-0054-39	Avoid all new structural range developments and location of supplements (salt or protein blocks) unless independent peer-reviewed studies show that the range improvement structure or nutrient supplement placement benefits sage grouse. (North Dakota RMP Amendment).
S-0060-02	<p>As the BLM moves forward in developing the Lewistown draft RMP by considering planning issues and proposing allocations, we ask that you identify and conserve identifiable tracts of land that are generally intact and undeveloped and that have high quality fish and wildlife habitat and dispersed recreation opportunities. We request that you designate or provide special emphasis to these areas in the Lewistown RMP and manage them as “backcountry conservation areas” (BCAs), to conserve and restore unfragmented fish and wildlife habitat and provide dispersed hunting and fishing opportunities. The TRCP is working with local sportsmen and women, professional wildlife managers, and hunting and wildlife conservation organizations to identify specific intact and undeveloped lands within the BLM Lewistown District that are appropriate for BCA management, and in follow up to these comments, we will provide supplemental recommendations that nominate specific areas within the Lewistown Field Office as BCAs.</p> <p>Grazing: The BCA has no effect on authorized rangeland health, standards, capacity (animal unit months - AUMs) or livestock grazing management actions and tools (e.g. fencing and watering).</p>

S-0066-01	The first issue to be addressed is Public Safety! This has to do with a piece of BLM land that dissects deeded lands, a county road splits this north and south. We have been here almost 30 years, with little or no problems. In the past 5 years however, problems have escalated into nightmares - loss of livestock due to gunshot (documented by the Montana Dept. of Livestock, constant trespass of deeded lands, hunter/hunter conflicts, wildlife & livestock harassment, hunter/landowner conflicts and miles of extra fence repair. Our ranch headquarters are within ½ mile of this conflict area causing concern for our own safety! Also the garbage is of concern. There are also law enforcement/landowner confrontation which was documented and vindicated.
S-0066-03	3rd issue, fairness in land use - we as grazing leases have to pay a fee plus take care of the land, up keep the fences and provide water on these allotment, while recreationers pay no fees and for the most part do not take care of the land!
S-0069-01	Although the BLM land in our pasture can't be fenced because of the roughness of the Missouri River Breaks area, we take care of it the same as for our own pasture. We do not overgraze our pasture. Fewer cattle are pastured in a dry year. It is a fact that grazing makes healthier grass not only for cattle but also for wildlife. The fuel for wildfires is greatly reduced. We provide water sources for our cattle and wildlife also benefits. In other words, we manage this environment to be productive and the Federal government has an income from BLM land. If cattle grazing should be reduced, wildlife will certainly suffer, and probably move to other areas.
S-0071-01	I am writing to request that any revisions to the travel plan include as much acreage and access for OHVs as possible. Public lands are just that - public - and they should be maintained for the use and enjoyment of EVERYONE, not just the people who oppose resource development, OHVs, horses, bicycles, cows and ever other conceivable use except walking in tennis shoes. "Saving public" land doesn't mean eliminating all other types of uses on the land otherwise there is nothing we are saving the lands for. Keep access open for all users on PUBLIC lands.
S-0072-01	Hopefully, the LRMP will sufficiently address the environmental impacts of livestock grazing. The LRMP must present the depth of analysis and consideration of grazing alternatives warranted by a land use plan for all BLM-managed lands in central Montana.
S-0072-02	Maintaining and improving wildlife habitat and restoring degraded range conditions should be reflected in the purpose and need for the LRMP in compliance with both the Taylor Grazing Act of 1934, the Federal Lands Policy Management Act (FLPMA) of 1976, and other laws that govern livestock management on public lands.
S-0072-03	Thus, the reason for addressing livestock grazing in the LRMP is to improve the range condition of the allotments within the project area and to maintain and improve wildlife habitat. This direction, based on laws and regulations, should be explicitly stated in the "Purpose and Need for the Plan" in the DEIS. Furthermore, the selection of any alternative in the DEIS that does not provide direction for meeting those goals violates the intent of the laws and regulations that govern public land management.

S-0072-05	<p>In the Anticipated Planning Issues Management Concerns document provided with the scoping notice, the BLM offers the following in regard to livestock grazing:</p> <p>Preliminary Planning Considerations</p> <ul style="list-style-type: none"> ➤ Conform with existing laws, regulations, and BLM policy pertaining to livestock grazing on public lands ➤ Incorporate Montana Standards for Rangeland Health and Guidelines for Livestock Grazing Management ➤ Consider ecological site inventory information ➤ Protect important biological resource functions that provide for soil stability, water quality, and healthy riparian and upland vegetation communities ➤ Provide for the protection and restoration of native species and potential natural communities ➤ Authorize use to minimize environmental impacts under the principles of multiple use and sustained yield. <p>The LRMP must specifically address how these goals will be achieved. For example, Guideline #1 of the Montana Standards for Rangeland Health and Guidelines for Livestock Grazing Management provides that “[g]razing will be managed in a manner that will maintain the proper balance between soils, water, and vegetation over time.” While such guidelines articulate important goals, those goals will not be achieved without requiring that land managers meet quantitatively measurable terms and conditions. The LRMP must provide clear, quantitative terms and conditions to guarantee compliance with those guidelines.</p>
S-0072-06	<p>In regards to livestock grazing generally, Western Watersheds Project urges the BLM to incorporate the following in the LRMP:</p> <p>Specific measurable terms and conditions for livestock grazing in riparian areas, uplands, and wildlife and fisheries habitat, including:</p> <ul style="list-style-type: none"> (i) a minimum of 7” stubble height remaining on hydric soils riparian greenlines after livestock grazing (ii) a 10% maximum annual bank or wetland alteration from all sources for streams and wetland hydric and mesic soil areas of upland seeps, springs, wet meadows and aspen clones (iii) a maximum annual woody browse utilization by all browsing ungulates of 15% on cottonwood, aspen, woody shrub, and willows (iv) a maximum annual grazing utilization of perennial grass species on upland landscapes by all grazer of 35% (v) a minimum 9” residual perennial native grass cover for ground-nesting birds like sage-grouse and sharp-tailed grouse.
S-0072-07	<p>The LRMP must identify how suitability determinations have been made for each of the allotment whether it is currently authorized for grazing or unallocated. Any allotments that do not meet the criteria described in Guideline #3 must be reevaluated. Unfortunately, according to the Anticipated Planning Issues Management Concerns document, it appears the BLM only intends to review currently unallocated parcels.</p>
S-0072-08	<p>The BLM must scientifically and accurately determine those lands which are capable and suitable for livestock grazing. The BLM must also accurately and quantitatively determine how much forage (i.e. forage capacity) is currently available. Additionally, the BLM must properly allocate that forage to watershed and stream protection, wildlife habitat and food, then to livestock if available.</p>
S-0072-09	<p>As the BLM must certainly acknowledge, the quality of the land in the project area is severely diminished. Thus, when the LRMP seeks to improve range condition, as it must, what this really means is that the LRMP must provide for improved riparian, upland, and wildlife habitat conditions and include goals, terms and conditions, and standards to achieve those goals.</p>
S-0072-10	<p>The correction of resource degradation caused by domestic livestock and the prevention of future degradation should be driving forces behind the LRMP and should be reflected throughout the NEPA document and in any future agency decisions regarding domestic livestock grazing in the project area. The Alternatives in the DEIS must set specific livestock grazing levels that will be used to meet standards.</p>

S-0072-11	Simply stating that specific standards will be developed at the site specific level violates law and allows the BLM to continue the degradation caused by domestic livestock. The BLM must establish allowable use levels as required by both 43 CFR Sec 4100.0-8 and 43 CFR 1601.0-5(b) by including maximum livestock utilization standards in the LRMP.
S-0072-12	The BLM must define what constitutes a sustainable level of livestock grazing. "Sustainability" is defined in the glossary as "[t]he ability of an ecosystem to maintain ecological processes and functions, biological diversity, and productivity over time." ⁴ The DEIS must explain how it meets this definition of sustainability.
S-0072-13	The LRMP should provide for long-term rest to facilitate recovery. Any discussion of impacts should address the use of peer-reviewed range science principles for management and rely on high standards of performance. The reliance on unfounded solutions such as time-controlled grazing are not adequate for recovery.
S-0072-14	The most effective way to protect and restore lands in the planning area would be the elimination of cattle from the landscape, and allow limited the amount of browsing in the area to that by wildlife. Stating that stricter standards will improve range in declining condition is not only a failure to disclose impacts, but it ignores the real problem. In numerous studies of riparian grazing impacts, investigators concluded that total removal of livestock was necessary to restore ecosystem health.
S-0072-15	Weighing the impacts of resource management practices is consistent with the BLM's mission of providing lands for multiple uses as recognized in the Multiple Use Sustained Yield Act. The "multiple use" concept as defined in law and regulations requires "a reasoned and informed decision that the benefits of grazing ... outweigh the costs" and a weighing of "the relative values of the resources." ¹⁵ Therefore, the BLM must show that the benefits of domestic livestock grazing outweigh the costs.
S-0072-16	In spite of the evidence of widespread loss of plant productivity and ground cover, accelerated erosion and BLM's own documentation of rapid declines in species such as sage-grouse, BLM routinely chooses not to address livestock impacts in any scientific or sustainable fashion. The LRMP must acknowledge the negative impacts of livestock grazing and propose significant grazing reductions to address these impacts.
S-0072-17	Based on 43 CFR 4180, appropriate actions to address the negative impacts of domestic livestock are to be implemented that will result in significant progress toward attainment of the standards no later than the start of the next grazing season. Clearly this has not been accomplished. Given the fact that the number of cows that could be grazed on BLM land in the planning area represents a slight and declining economic influence, this degradation is unacceptable.
S-0072-18	Furthermore, Bock et al. ²⁶ reviewed the effect of grazing on Neotropical migratory landbirds in three ecosystem types, and found an increasingly negative effect on abundances of bird species in grassland, riparian woodland, and Intermountain shrubsteppe (almost equal numbers of species with positive and negative responses to grazing in grassland; six times as many with negative as positive responses in shrubsteppe), but impacts to these species are lacking in the DEIS.
S-0072-19	<p>Since sagebrush communities on private lands have been converted to agricultural or other uses or are not being managed in a manner compatible with sagebrush dependent wildlife, the importance of maintaining the integrity of sagebrush habitats on BLM lands within the planning area to provide taller, denser stands for mule deer, pronghorn, and sage-grouse is extremely important. For example, big sagebrush canopy cover values on undisturbed relicts and kipukas does not support the assertions by the BLM that big sagebrush canopy cover increases due to livestock grazing.⁴¹ In fact, the just cited researchers found the following:</p> <ul style="list-style-type: none"> · Big sagebrush canopy cover was higher inside grazing exclosures and was decreased outside exclosures, · Perennial grasses and sagebrush canopy cover were significantly higher in ungrazed vs. grazed plots, · After grazing had been removed big sagebrush canopy cover and grass cover increased significantly.

S-0072-20	Anderson and Inouye ⁴² found that contemporary state-and-transition models do not fit the sagebrush ecosystem because viable remnant populations of native grasses and forbs are able to take advantage of improved growing conditions when livestock are removed. They found further that despite depauperate and homogenous conditions of permanent plots in 1950, after 45 years vegetation had been anything but static, clearly refuting claims of long-term stability under shrub dominance. Mean richness per plot of ALL growth forms increased steadily in the absence of domestic livestock grazing. Grasses and forbs increased significantly. Given these findings, perhaps the BLM should analyze the impacts of long-term active management and its impacts on sagebrush communities and obligates compared to the impacts of removing livestock and allowing these communities to recover naturally. Additionally, since the continued “management” of sagebrush has led to many of the situations scientists now agree are threatening these ecosystems, the removal of livestock from sagebrush communities in less than satisfactory condition should be a seriously considered alternative in the LRMP.
S-0072-23	A recent study published in the Journal of Applied Ecology concludes that livestock grazing contributes to the domination of some western landscapes by cheatgrass, an invasive grass that both destroys sage-grouse habitat and increases the frequency of wildfire. ⁷⁰ To mitigate the spread of cheatgrass, the study suggests maintaining and restoring bunchgrasses and soil crusts, two ecological features quickly degraded under the hooves of livestock. Such mitigation would require the decrease or elimination of livestock grazing in the affected areas.
S-0072-24	Antelope are also negatively impacted by livestock and livestock-related fencing. Fences or fragment antelope habitat. Fences pose a serious challenge and create a number of problems for antelope. Fences can disrupt antelope escape strategies by confusing them, forcing them to slow down, change routes and congregate, in particular in fence corners. BLM must consider the removal of fences on pronghorn habitat within the planning area. Livestock use and presence can also significantly impact pronghorn habitat and behavior. ⁷²
S-0072-25	The DEIS should discuss in detail the vast array of livestock diseases that can significantly harm if not kill native wildlife. Bighorn sheep in particular are extremely susceptible to livestock diseases carried by domestic sheep and goats, which are often asymptomatic to these same diseases. <i>Pasteurella pneumonia</i> and lung worm in particular are spread by domestic sheep.
S-0072-26	Additionally, any analysis of grazing is incomplete without a discussion of the effect the practice has had on predators. The most vehement opposition to wolves, bears, and other predators comes from the livestock industry, and is one of the main reasons some of the species are now listed. Predators perform important top-down ecological functions, yet they are consistently eradicated and heavily managed in order to protect livestock on public land, costing taxpayers millions of dollars. The DEIS must include an analysis of the impacts from livestock grazing on predators in the planning area.
S-0072-28	The livestock sector contributes a larger share of carbon emissions than does transport (Steinfeld et al., 2010 ⁷⁶). The environmental analysis should document the expected greenhouse gas emissions from the project for each alternative over the ten-year life of the permit, and the contribution this project will make to overall greenhouse gas emissions within the planning area that contribute to global warming.
S-0072-29	The NEPA documents should review the changes that are likely to occur in the project area due to global climate change over the 10-year period of the proposed permit. While uncertainties remain regarding the timing and extent of impacts from climate change, modeling indicates that on average, Montana will likely experience higher temperatures in all seasons; longer dry periods; heavy precipitation events; more frequent droughts; and increased wildfire risk. These changes will affect the landscape of planning area, especially riparian and water resources and the species that depend on them as well as the amount and availability of forage. Landscapes that are less fragmented provide greater opportunity for species to shift ranges without being blocked (Opdam and Wascher, 2004 ⁷⁷). Fragmentation of the landscape through vegetation removal or grazing infrastructure such as fencing exacerbates the challenges that species are already dealing with in trying to adapt to a changing climatic regime. Removing or reducing livestock would both alleviate a widely recognized and long-term stressor and make these public lands less susceptible to the effects of climate change (Beschta et al., 2012 ⁷⁸).

S-0072-31	While the BLM’s need not choose the alternative with the greatest economic return, the BLM also fails to calculate the economic value of grazing. The economic and social value of public lands livestock grazing receives disproportionate weight in BLM planning documents. The importance of public lands grazing to the economy of the region is grossly overestimated. The calculation of the social and economic values of the draft plan should demonstrate a clear understanding and consideration of the conflicts between continued grazing and other uses of the public lands. The BLM must provide a more thorough analysis of the social and economic values of different livestock grazing levels. This analysis must consider the administrative costs of a grazing policy, economic benefits from recreation where grazing is reduced or eliminated, and the cost of negative environmental consequences of livestock grazing in the area.
S-0072-32	The administrative costs of public lands grazing are often underestimated in BLM planning documents. Considering only direct costs, BLM range management costs in 2011 totaled \$77.3 million, while income from grazing fees was only \$4.5 million, leaving a net deficit to the U.S. Treasury was \$72.8 million. ⁷⁹ This loss on federal grazing programs fails to consider indirect costs, such as administration of the range program. Estimates of those indirect costs rise well over \$100 million. ⁸⁰ The economic calculations in the DEIS should not ignore potential administrative cost savings from reduced grazing. Decreased grazing would save the BLM costs associated with environmental analysis, litigation, grazing permit administration, predator control, weed spraying, and costly efforts to preserve species harmed by grazing.
S-0072-33	Often, public lands recreation provides far more economic benefit to local communities than livestock grazing. Improved environmental conditions that would result from decreased grazing would likely create more jobs and economic development related to outdoor recreation such as hiking, camping, fishing, hunting, and the associated benefits to restaurants, hotels, convenience stores, and other in the area. A 2011 Department of Interior study stated that “[r]ecreation visits to Interior-managed lands in the contiguous United States, Hawaii, and Alaska in 2011 supported over 403,000 jobs and about \$48.7 billion in economic contributions to the communities and regions surrounding Interior-managed land.” ⁸¹ visits DEIS ignores the economic significance of recreation, an economic benefit that would increase with improved land conditions from decreased grazing.
S-0072-35	In accordance with its multiple use mission, the BLM must consider land uses other than grazing in its calculation of the economic and social values of each alternative, including administrative costs and environmental impacts to water, wildlife, plants, recreation, potential species loss, intrinsic land value, and beauty. Under the Taylor Grazing Act, the BLM must prevent injury to public lands. ⁸⁵ The current grazing utilization levels are unsustainable and the proposed plan must not continue grazing at unsustainable levels. Restoration of the land will require costly action by the BLM. Taking into account the overestimated costs and underestimated benefits of reducing grazing in the planning area, the BLM must provide a thorough and balanced analysis that considers the factors addressed in this comment.
S-0072-36	As part of the DEIS’s explanation of the existing management situation, the DEIS and LRMP must provide an Allotment Management Summary detailing the conditions of each allotment within the planning area. This summary should include not only the number of AUMs permitted on each allotment, but also the actual use or “average use.” Without data about actual use, the environmental assessment of livestock grazing impacts may be significantly distorted, especially on those allotments where less than the permitted AUMs are actually grazing on the land. Additionally, this section of the document should include the suspended nonuse AUMs, other forage allocations, specific resource concerns, and management objectives. The attached two-page excerpt from the July 1999 Owyhee LRMP and FEIS offers a great example of an Allotment Management Summary.
S-0072-37	The DEIS and LRMP must also address the fact that livestock sizes, and thus forage consumption, have increased dramatically since the AUM was defined. Failure to address this critical issue will lead to legal vulnerability under NEPA, APA and the False Claims Act.
S-0072-37	The National Environmental Policy Act (“NEPA”) requires that the BLM consider a reasonable range of alternatives. See 42 U.S.C. § 4332(2)(C)(iii). Considering the presence of endangered, special status, and sensitive species in the planning area, a no grazing alternative and 50% reduction in permitted grazing should be included within the reasonable range of alternatives for the LRMP.

S-0072-38	<p>The Society for Range Management (SRM) in 1974 defined an Animal Unit “to be one mature (1000 lb.) cow or the equivalent based upon average daily forage consumption of 26 lbs. dry matter per day.” SRM also defined an Animal Unit Month as “The amount of feed or forage required by an animal-unit for one month.” NRCS defined the forage demand for a 1,000 pound cow as 26 pounds of oven-dry weight or 30 pounds air-dry weight of forage per day. It is important to ensure that forage consumption rates by livestock are based on the size of animals present on the allotment and a reasoned estimate of their daily consumption rates. The following analysis provides some background and justifies a more current forage consumption rate for cow/calf pairs. It is BLM’s obligation to ensure this forage is accurately accounted for as this is its fiduciary duty to the American People. Undercounting forage consumption by livestock results in undercharging for that forage. This is potentially defrauding the American public under the False Claims Act. Forage consumption rates must be calculated based on the current weights and consumption rates of livestock in order to provide the forage needed for wildlife, plant community sustainability and watershed protection and to ensure the public trust is not violated by undercharging for the actual weights of cattle and calves grazed.</p> <p>The current RMP authorizes a certain number of AUM’s. However, that is based on an AUM equivalent to 800 lbs of forage per month. The most current information, reviewed above shows that number to be 1368 lbs/month per AUM. Therefore, if sufficient forage were available to satisfy all needs, the numbers of livestock grazed should be reduced to account for the increases in weight and correct the erroneous assumption that 800 lbs/month is an accurate consumption figure. Using the ratio between the current RMP’s forage amount per AUM divided by the correct figure above, gives a needed reduction in permitted numbers and/or seasons of use of 42% to account for the RMP’s understated forage consumption, without accounting for wildlife, plant and watershed needs. The BLM can not just assume that an AUM is 800 lbs of forage consumption per month. The RMP/EIS must analyze the current and potentially available forage to satisfy the forage consumption by the number of livestock it currently permits or proposes to permit. It can not assume that the forage capacity determined 20-40 years ago is applicable today.</p>
S-0072-39	<p>Because of economic pressures and uncertainty, many ranchers in the West would like to voluntarily retire their grazing permits, and the LRMP and Final EIS should grant ranchers the freedom to retire their permits if voluntarily waived to the BLM. Voluntary grazing permit retirement would offer permittees a new economic opportunity while providing protection and restoration for the land managed by the Lewistown and Butte BLM offices. All alternatives analyzed in the DEIS and the chosen alternative for the LRMP need to include specific direction and language authorizing the permanent retirement of voluntarily waived BLM grazing permits. Suggested language for authorizations is as follows:</p> <p>Grazing privileges that are lost, relinquished, canceled, or have base property sold without transfer would have attached AUMs held for watershed protection and wildlife habitat. (Adapted from the Challis Resource Area Proposed LRMP and Final EIS, October 1998, p. 87).</p>
S-0087-02	<p>In general, the Tribes does not support fencing, surface disturbing activities, development of building and structures (e.g., water development projects, power lines, etc.), and agriculture on public lands.</p>
S-0087-05	<p>We would also like the BLM to develop goals and objectives that allow buffalo expansion and population recovery of sage grouse and other special status species on public lands within the planning area.</p>

LANDS AND REALTY (LR)

COMMENT NUMBER	COMMENTS RELATED TO LANDS AND REALTY (LR)
S-0003-07	<p>Please try to keep industrial activity such as power lines gas and oil wells and pipelines concentrated on the edges of BLM lands, adjacent to existing roads. Leave wide open spaces for non-motorized recreation far from industrial development.</p>

S-0003-09	I hope you are able to consolidate BLM lands by pursuing land trades, acquisitions, and conservation easements.
S-0004-06 (DUPLICATE)	Identify opportunities to improve public access and consolidate public lands through conservation easements, land trades, and land acquisitions.
S-0004-07 (DUPLICATE)	Identify areas where industrial activities - oil and gas wells, transmission lines, pipelines, wind farms, communication towers, mines - will have the least impact and direct development there.
S-0008-01	By Act of Congress in December 2006, then-Senator Max Baucus' legislation signed by then-Pres. George W. Bush placed off-limits to any new oil and gas and mineral leasing and development all public lands (i.e. Lewis & Clark National Forest and BLM) along Montana's Rocky Mountain Front, including federal minerals on split-estate private surface lands within approximately six miles more-or-less east of the national forest boundary. A number one priority in your RMP should be to emphasize that this law is in effect and must be adhered to.
S-0009-01 (DUPLICATE)	Loss of hunting and other access to private farm and rangeland in Montana, as across the West, is becoming a critical problem. Wildlife habitat on private lands is being lost to an agricultural industry responding to booming new global markets. Energy development has demanded, and will continue to demand, tradeoffs from wildlife and public lands recreation. All of these factors increase the importance of the Lewistown RMP to every stakeholder in these public lands.
S-0034-40	Anytime there is a land exchange between private and public entities, a public access easement or right-of-way should be required in order to offset the trend of less public access to public land over the past 35 ± years and the cumulative negative impact of that trend on multiple-use recreationists.
S-0034-42	Closed unless posted open is an impractical concept because signs do not last very long for many reasons including vandalism, animals and weather knocking them down, rotting of posts, etc.
S-0034-50	Every public access closure through private land should be challenged and protected by asserting legal right-of-ways.
S-0036-01	<ul style="list-style-type: none"> • Access to undisturbed and primitive environments helps children and citizen scientists gain interest in and understanding of science, biology, geology, ecology, environment, natural history, and ancient civilizations.
S-0043-07	<p>Access to and equal use of landlocked parcels</p> <ol style="list-style-type: none"> 1) Acquisition of Access to landlocked parcels. Acquiring public access to the boundaries of large BLM holdings where no such access currently exists must become the top travel priority for BLM management. 2) Proceed with no land exchange transactions that will negatively impact future public access to hunting and fishing opportunities in the area of the proposed exchange. Coordinate with FWP in evaluating wildlife management outcomes of completed exchanges. 3) Identify parcels without legal public access and direct efforts to improve legal public access. 4) Prohibit hunting outfitting on BLM lands where the general public does not have legal access.
S-0043-09	Strong direction to avoid sagebrush fragmentation by additional roads or construction of overhead powerlines, wind farms, energy development or other uses contributing to fragmentation of sagebrush communities.

S-0044-01	<p>While a portion of the federal minerals along the Front have been withdrawn by congressional action, some federal minerals were not subject to that withdrawal. Significant investment has been made by the US Fish and Wildlife Service, Montana Fish Wildlife and Parks, The Nature Conservancy, The Conservation Fund, other private land trusts, and numerous private landowners to protect lands on the Rocky Mountain Front for conservation purposes. More than 225,000 acres of private lands have been protected on the Front to date, through fee acquisitions or conservation easements. Some of these protected lands are underlain with federal minerals not subject to the congressional mineral withdrawal.</p> <p>These fee and conservation easement interests were acquired to protect the important biological values of these lands. These values include intact native plant grassland, wetland, riparian, and forest communities; habitat for numerous plant species of concern; and habitat for numerous wildlife species of concern such as grizzly bear, short-horned lizards, Sprague's pipit, and numerous other grassland, wetland, and forest bird species. These intact native communities and species of concern should be considered in the analysis of any leasing decisions or stipulations, and should receive special consideration and protective stipulations, especially on lands protected for conservation purposes.</p> <p>Beyond the habitat values of any specific tract, intact habitats on these lands contribute to the larger scale habitat requirements and travel routes required for species with large home ranges, including grizzly bears and ungulates such as antelope, elk, and mule deer. Mineral development could significantly fragment existing large blocks of native habitats. Cumulative effects and impacts of mineral activities at these larger scales should be addressed in the RMP as well.</p>
S-0044-04	<p>Federal minerals underlie the Egg Mountain dinosaur site owned by Museum of the Rockies, the surface of which is also protected by the Nature Conservancy conservation easement. This site is one of the most significant paleontological localities in the country, and may be eligible for future listing on the National Register of Historic Places. Other federal minerals occur within the same geological formation and likely have important paleontological resources as well. Potential impacts of mineral activities to these paleontological and historic resources should be addressed in the RMP, including appropriate stipulations to protect these resources.</p>
S-0048-01	<p>My Primary Concern: (Trails and Travel Management)- To insure continued motor vehicle access for the benefit of the above-described private lands over and across adjoining public lands which are owned and administrated by the Bureau of Land Management. Obviously, I am opposed to any change in the Resource Management Plan which would impair or close my current access road. Currently I have the ability to use all manner of motor vehicles, including ATV's, upon the right-of way, subject to the provisions of the use permit. I believe that the current rules and limitations governing my right-of-way/temporary use permit are adequate to protect the affected public lands.</p>
S-0048-02	<p>My Secondary Concerns: (Wilderness Characteristics and Livestock Grazing) - I note that the Bureau of Land Management lands adjoining and within the immediate vicinity of my private land have been identified by the agency as having potential wildlife characteristics. Indeed, the area has exceptional wildlife. The burgeoning numbers of elk, mule deer, sharp-tailed grouse and turkeys - just to name a few species- are ample evidence of this. However, regardless of the abundance of wildlife in this area, any Resource Management Plan must also provide for other long-standing and beneficial multiple uses in this portion of Northeast Fergus County- primarily livestock grazing, hunting and recreational access.</p>

S-0050-02	<p>Collar Gulch should be opened back up for vehicular public access by opening the gate. The difficult decent and poor road in itself will limit the type and amount of traffic. It seems that the fish have been well protected and after 20 years of the access being closed it should once again be available to members of the public who are not capable of hiking in by way of the Camp Maiden road or the Collar Gulch Trail system. The gulch was a favorite place for many people for many years. The old Collar Mill stone foundation and dam farther up the creek are significant historical sites. And, it's always thrilling to view the fish. Thought should also be given to possibly lifting or reducing the size of the Collar Gulch ACEC designation. Is it still necessary?</p> <p>The BLM should survey and mark the boundary between public lands and private property in Collar Gulch. A sizable portion of Collar Creek is within the boundary's of the Hendricks and Edwards patented mining claims. The BLM should inquire with the property owners to determine if they would be interested a land swap or sale. As one of those owners, I would consider it.</p>
S-0051-12	<ul style="list-style-type: none"> • Work with permittees with any land exchanges, sales, or trades. • No net gain of land ownership by the BLM in Petroleum County • Consider the influence of any changes of ownership on local economy and customs.
S-0051-13	<p>Delineation of Right-of-Way Corridors and Sites</p> <ul style="list-style-type: none"> • Agree with Planning Questions and Planning Considerations at this time.
S-0052-02	<p>Prior to designating SRMAs and ERMAs that contain adjoining private land, the private landowner should be consulted. An agreement should be developed that describes the roles and responsibilities for management of the area - these should include responsibility for trash cleanup, the spread of noxious weeds, the degradation of vegetation, and the maintenance of roadways because of the area being used for recreation. As co-owner of the Vogel Dam, the Brady Ranch is concerned about the problems created by the reservoir being a public recreation site. The Ranch was not consulted prior to the area becoming a designated recreation area and has not been consulted about the stocking of fish that has been taking place. Specific problems resulting from high public visitation are driving on the spillway and dam fill - which, according to the BLM engineer, will eventually result in the failure of these structures - blocking access across the dam to the private property, vandalism and ignoring of signage placed by the property owners, driving off roadways, leaving trash, spreading weeds, fire danger, etc. These problems are as detrimental to the BLM managed property as the private property. These issues need to be addressed or the fish stocking of the Vogel Reservoir will end.</p>
S-0052-04	<p>There should be no net gain of public land. Exchanges, purchases, and donations to create a more efficient public land system is very encouraged. The end result, however, should not be an increase of public land.</p>
S-0053-02	<p>Another issue that I would like to see addressed is related to the disposition and management of the many small scattered parcels of BLM land in places such as Meagher County. Many, if not most of, these parcels have no public access, as they are surrounded by private land. In addition, these parcels are usually not managed separately from the surrounding private property. I would like to see the BLM through disposals, acquisitions, and land exchanges work to block up areas of BLM land or public land in general, i.e. block up BLM land with adjacent USFS land or state DNRC land that is public accessible, to improve public access.</p>
S-0054-07	<p>Priority Habitat would be a priority in consideration of land acquisitions. Retain public ownership of PH. Consider exceptions where: There is mixed ownership, and land exchanges would allow for additional or more contiguous federal ownership patterns within the priority sage-grouse habitat area; Under priority sage-grouse habitat areas with minority federal ownership, include an additional, effective mitigation agreement for any disposal of federal land. As a final preservation measure consideration would be given to pursuing a permanent conservation easement. (North Dakota Plan Amendments).</p>
S-0054-11	<p>Timing Limitations should apply to surface disturbing and disruptive activities. (Lander RMP revision).</p>
S-0054-15	<p>Priority Habitats are exclusion areas for new renewable energy ROW permitting. (North Dakota, California-Nevada, and Idaho-Southwest Montana RMP Amendments; HiLine, Buffalo, and South Dakota RMP revisions).</p>

S-0054-32	Site and/or minimize linear ROW to reduce disturbance to sagebrush habitats. Maximize placement of power lines and transportation routes in existing ROWs. Power lines would be buried, eliminated, designed or sited in a manner which does not impact SG. ROWs would be allowed with appropriate mitigation and conservation measures identified within the terms of the authorization to minimize surface disturbing and disruptive activities. Co-locate new ROWs within existing ROWs where possible. (North Dakota RMP Amendment).
S-0054-33	Exclusion area for renewable energy rights of way; allowable if co-located on industrial facilities for on-site generation. (California-Nevada RMP Amendment).
S-0054-36	High-profile structures exceeding 10 feet in height, would be eliminated, designed or sited in a manner which does not impact sage grouse. Permanent (longer than 2 months) structures which create movement must be designed or sited to minimize impacts to greater sage grouse. (North Dakota RMP Amendment).
S-0054-38	Bury new distribution lines within 1 mile of leks. (HiLine RMP revision).
S-0056-01	<p>Use a systematic interdisciplinary approach to integrate physical, biological, economic, and other sciences.</p> <p>BLM should place a high priority on consistency when evaluating human activities' impact on the landscape when assessing existing uses and developing new management directives. For example, when evaluating the safety concerns associated with various forms of outdoor recreation (mountain biking, recreational shooting, hiking, horseback riding), it is critical that BLM use comparable metrics such as accident statistics to identify legitimate safety issues and convey them to the public via the formal planning process. Additionally, BLM should take great care to evaluate and utilize economic and participation data throughout the planning process. According to the U.S. Fish and Wildlife Service's 2011 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation, 267,000 anglers spent 2,450,000 days fishing in Montana and spent \$339,383,000 doing so. Additionally, 150,000 hunters spent 2,493,000 days hunting and spent \$627,298,000 on trip-related expenditures, equipment and other items associated with hunting in that year alone. In 2011, 7.2 million people nationwide shot recreationally, with only 2.9 million visiting shooting ranges. Many of these remaining 4.1 million recreational shooters depend on access to informal shooting on federal land in order to continue recreating as they have for many decades. When considering management proposals or activities that would impede access to hunting, fishing or recreational shooting throughout the planning process, BLM should take these figures and others into consideration. Additionally, BLM should note and discuss the impact that impeding recreational access would have on local economies, the ability to collect state and local taxes and revenues collected through the Wildlife and Sportfish Restoration programs which collect taxes on the manufacture of firearms, ammunition, fishing tackle and other outdoor equipment taxed to support conservation.</p>
S-0058-05	We would urge BLM to identify opportunities to improve public access to public lands, and to consolidate public lands through acquisitions, land trades, and conservation easements.
S-0058-06	<p>We would like BLM to identify places where industrial activities like oil and gas wells, pipelines, wind farms, and mines will have the least impact, and to direct development there.</p> <p>We would also urge you to prepare a Master Leasing plan for any areas in the Field Office where oil/gas potential and wilderness characteristics or critical sage-grouse habitat overlap.</p>
S-0059-04	<p>Land tenure in the Lewistown planning area has already proven to be a controversial topic. In light of present circumstances, the BLM should review the previous Judith Resource, Headwaters, and Judith-Valley-Phillips RMP documents, and look at future land tenure decisions to develop a trend towards retaining sensitive and ecologically important areas, revisiting previously-identified disposal lands, and providing adequate open space for the public.</p> <p>As population increases, it will be crucial that consideration be given to providing adequate open space and trails on public lands. Particular attention should be taken to prevent the sale or exchange of BLM lands highly valued by local communities for their open space, wildlife habitat, and recreation opportunities they provide. Also, LWCs should be a priority as land configuration is an important consideration. Land sales or exchanges that can improve continuity, recreational opportunities, or wildlife habitat within or surrounding LWCs and ACECs should be a priority</p>

	through conservation easements, land trades, and land acquisitions.
S-0059-06	We ask that the BLM take a flexible approach to boundary delineation. While we would like to see the maximum amount of acreage protected for their wilderness characteristics, we also want to be realistic and recognize that not every acre within a potential boundary will possess wilderness characteristics. However, we do want to point out that an area can have wilderness characteristics even though every acre within the area may not meet all the criteria and that the location of boundaries should primarily be set to exclude the unnatural portions of the area. BLM Manual 6310.06(C)(3)(e). Also, developed rights-of-ways (ROW) should be treated like other impacts, and the boundary should be drawn to exclude those ROWs. Please give the same consideration for all potential LWCs. As with some field offices, GIS is sometimes favored over a field visit and can lead to unfortunate conclusions. Often times, this can be the case for potential units under 5,000 acres. Not all units under 5,000 acres should be considered as a LWC, except for those that demonstrate that the area is of sufficient size as to make practicable its preservation and use in an unimpaired condition.
S-0059-17	We encourage the BLM to look for ways to minimize conflict with potential lands with wilderness characteristics. This includes analyzing the suitability of units for closures, NSO, and CSU stipulations for specific units. Also, please analyze the suitability of these potential LWCs as ROW exclusion or avoidance zones.
S-0062-03	Regarding land tenure adjustments, I have no issue with using the scattered, isolated parcels that are difficult to manage being used for exchanges or sales. I wonder, however, in controversial places such as Durfee Hills, if you would consider retaining a recreation easement if you feel the values warrant continued public access.
S-0065-02	Consider land-swaps and/or conservation easements with private citizens if the action results in increased public access or improved habitat connectivity for species. Creating a management plan on a landscape level has been shown to improve the health of the landscape and increase biodiversity in critical areas. Creating areas that allow for landscape level management will allow for a more comprehensive scale of planning. Additionally, 'islands' of BLM land that are not publically accessible, such as that in Durfee Hills in Fergus County, are of little value to the public due to their restricted access. Facilitating mutually beneficial agreements with private citizens will create improved management practices and increase public access.
S-0065-03	Plan for industrial development (i.e. pipelines, wind farms, communication towers, mines) on public land in a way that prioritizes minimal habitat disturbance. This does not oppose all development, but rather encourages a land management strategy that gives equal weight to ecosystem and economic concerns. As the "Last Best Place" Montana has the unique characteristic of minimally developed public lands that can still be utilized for recreational activities without signs of human development. However, prioritizing economic concerns over ecosystem values will result in the eventual erosion of these natural spaces.
S-0066-01	The first issue to be addressed is Public Safety! This has to do with a piece of BLM land that dissects deeded lands, a county road splits this north and south. We have been here almost 30 years, with little or no problems. In the past 5 years however, problems have escalated into nightmares - loss of livestock due to gunshot (documented by the Montana Dept. of Livestock, constant trespass of deeded lands, hunter/hunter conflicts, wildlife & livestock harassment, hunter/landowner conflicts and miles of extra fence repair. Our ranch headquarters are within ½ mile of this conflict area causing concern for our own safety! Also the garbage is of concern. There are also law enforcement/landowner confrontation which was documented and vindicated.
S-0074-05	However, in many cases scattered parcels of public land should be retained in public ownership in order to provide broader access over a larger area, so very careful analysis is needed on this issue.
S-0074-06	*Identify areas where industrial development-oil and gas wells, pipelines, wind farms, transmission lines, communication towers, mines-will have the least impact on wildlands and wildlife and direct activities accordingly.
S-0079-05	*Development - Identify areas where industrial development-oil and gas wells, pipelines, wind farms, transmission lines, communication towers, mines-will have the least impact on wildlands and wildlife, and direct activities accordingly.

S-0080-02	Industrial activities should be carefully considered and not just given carte blanche access or development rights where they don't already exist. Especially fracking for oil and gas or any other activities that will damage the land or water. Industrial activities should be placed where they will do the least damage and maintained in corridors with other development.
S-0087-02	In general, the Tribes does not support fencing, surface disturbing activities, development of building and structures (e.g., water development projects, power lines, etc.), and agriculture on public lands.
S-0087-07	We also want to infom you of our policy on land tenure adjustments. The Tribes opposes any federal land disposition, sale, or transfer to private entities or state and local governments based upon two fundamental reasons. First, the United States government entered into a solenm treaty with the Shoshone and Bannock tribal peoples in which the Tribes reserved certain off-reservation hunting, fishing, and gathering rights which we continue to exercise on unoccupied lands of the United States. Secondly, the United States, including its federal agencies, have a trust responsibility as established in the Fort Bridger Treaty and other federal laws, policies and executive orders to protect and preserve the rights of Indian tribes, and to consult with the Tribes prior to such land sales or transfers. To better understand our position we have attached our position statement regarding the transfer of federal lands.

MINERALS AND ENERGY (ME)

COMMENT NUMBER	COMMENTS RELATED TO MINERALS AND ENERGY DEVELOPMENT (ME)
S-0003-02	Please do not allow any oil and gas and hard rock mineral development.
S-0003-07	Please try to keep industrial activity such as power lines gas and oil wells and pipelines concentrated on the edges of BLM lands, adjacent to existing roads. Leave wide open spaces for non-motorized recreation far from industrial development.
S-0004-03 (DUPLICATE)	Identify areas and waterways with wildlife or wildland values that are not fulfilling their potential because of noxious weeds, past commercial activities or ground disturbances that could be restored.
S-0004-07 (DUPLICATE)	Identify areas where industrial activities - oil and gas wells, transmission lines, pipelines, wind farms, communication towers, mines - will have the least impact and direct development there.
S-0007-03	The new Resource Management Plan must protect resources first and BLM must be bold in barring uses that threaten native vegetation and critical wildlife habitat. Extractive uses such as mining, timber and grazing as well as motorized recreation must take second place when it coming to managing BLM lands in central MT.
S-0008-01	By Act of Congress in December 2006, then-Senator Max Baucus' legislation signed by then-Pres. George W. Bush placed off-limits to any new oil and gas and mineral leasing and development all public lands (i.e. Lewis & Clark National Forest and BLM) along Montana's Rocky Mountain Front, including federal minerals on split-estate private surface lands within approximately six miles more-or-less east of the national forest boundary. A number one priority in your RMP should be to emphasize that this law is in effect and must be adhered to.
S-0034-55	Agencies are encouraged to avoid trail closures associated with other actions including timber sales, mining, and livestock grazing. Corrective action should be taken where trail closures in the past have resulted from these sorts of past actions. Loss of motorized trails because of past timber sales should be mitigated by connecting old and new travelways to create looped trail systems.
S-0040-01	This RMP area includes the North Moccasin Mountains. These mountains contain a significant ore deposit of excellent quality magnetite (iron ore) plus other minerals such as galena (silver-lead-gold) ore. I ask that this RMP does not jeopardize the extraction of these minerals for the next generation and leave them vulnerable to importing their basic needs. These materials are imperative to the manufacture of all our electronic equipment.
S-0043-08	Protections of all Greater Sagegrouse habitats 1) Any future oil and gas development must be restricted with No Surface Occupancy restrictions on all occupied sage grouse habitats, especially near leks and nesting habitat.

S-0043-09	<p>Protections of all Greater Sagegrouse habitats</p> <p>2) Strong direction to avoid sagebrush fragmentation by additional roads or construction of overhead powerlines, wind farms, energy development or other uses contributing to fragmentation of sagebrush communities.</p>
S-0044-01	<p>While a portion of the federal minerals along the Front have been withdrawn by congressional action, some federal minerals were not subject to that withdrawal. Significant investment has been made by the US Fish and Wildlife Service, Montana Fish Wildlife and Parks, The Nature Conservancy, The Conservation Fund, other private land trusts, and numerous private landowners to protect lands on the Rocky Mountain Front for conservation purposes. More than 225,000 acres of private lands have been protected on the Front to date, through fee acquisitions or conservation easements. Some of these protected lands are underlain with federal minerals not subject to the congressional mineral withdrawal.</p> <p>These fee and conservation easement interests were acquired to protect the important biological values of these lands. These values include intact native plant grassland, wetland, riparian, and forest communities; habitat for numerous plant species of concern; and habitat for numerous wildlife species of concern such as grizzly bear, short-horned lizards, Sprague's pipit, and numerous other grassland, wetland, and forest bird species. These intact native communities and species of concern should be considered in the analysis of any leasing decisions or stipulations, and should receive special consideration and protective stipulations, especially on lands protected for conservation purposes.</p> <p>Beyond the habitat values of any specific tract, intact habitats on these lands contribute to the larger scale habitat requirements and travel routes required for species with large home ranges, including grizzly bears and ungulates such as antelope, elk, and mule deer. Mineral development could significantly fragment existing large blocks of native habitats. Cumulative effects and impacts of mineral activities at these larger scales should be addressed in the RMP as well.</p>
S-0044-02	<p>As a whole, the Rocky Mountain Front is largely free of noxious weeds. Weed management and prevention on the Front has been a priority for numerous private and public landowners, and other agencies for many years. The potential for the introduction or spread of invasive weeds as a result of mineral activities should also be considered in the RMP, and special stipulations should be developed to address invasive species.</p>
S-0044-03	<p>Of special note is The Nature Conservancy's Pine Butte Swamp Preserve, portions of which are underlain by federal minerals. Peat wetlands at Pine Butte support significant populations of 13 plant species of concern including <i>Braya humilis</i>, <i>Gentianopsis macounii</i>, <i>Primula incana</i>, <i>Salix serissima</i>, <i>Carex craweii</i>, <i>Eleocharis rostellata</i>, <i>Juncus acuminatus</i>, <i>Kobresia simpliciuscula</i>, <i>Trichophorum cespitosum</i>, <i>Trichophorum pumilum</i>, <i>Cinchidium stygium</i>, <i>Meesia triquetra</i>, and <i>Scorpidum scorpioides</i>. These wetlands at Pine Butte are likely the largest peatland complex in Montana. These wetlands were recently recognized by the Montana Native Plant Society as part of its Important Plant Areas Program (http://www.mtnativeplants.org/Important%20Plant%20Areas). Maintenance and protection of surface and sub-surface hydrology in and around the wetlands is crucial for maintenance of the wetland complex. These wetlands also provide critical habitat for many wildlife species, most notably the security and feeding habitat for grizzly bears. Given these significant values we believe this area should receive the highest protections possible, preferably closure to leasing or at minimum no surface occupancy.</p>
S-0044-04	<p>Federal minerals underlie the Egg Mountain dinosaur site owned by Museum of the Rockies, the surface of which is also protected by the Nature Conservancy conservation easement. This site is one of the most significant paleontological localities in the country, and may be eligible for future listing on the National Register of Historic Places. Other federal minerals occur within the same geological formation and likely have important paleontological resources as well. Potential impacts of mineral activities to these paleontological and historic resources should be addressed in the RMP, including appropriate stipulations to protect these resources.</p>

S-0044-05	<p>The Nature Conservancy is concerned that federal mineral leasing and development could have significant impacts to the surface and conservation values that have been protected on the Rocky Mountain Front. The lands on the Front contain numerous wildlife, vegetation, hydrologic, cultural and large scale habitat values that require special consideration. Decisions regarding federal minerals on the Front should offer the highest protections possible for these special values, including special protective stipulations, no surface occupancy, or closure to leasing, especially on lands where the surface has been protected for conservation purposes.</p>
S-0045-01	<p>The Montana Native Plant Society's Important Plant Areas (IPA) Program identifies the most important sites for plant conservation across Montana using consistent criteria. An IPA supports an exceptional population of one or more globally rare plants or an exceptional assemblage of plants rare or threatened in Montana. The Lewistown RMP Planning area includes the Pine Butte Peatlands IPA in west-central Teton County. The Pine Butte Peatlands provide habitat for 13 species of concern considered rare in Montana, including <i>Braya humilis</i>, <i>Gentianopsis macounii</i>, <i>Primula incana</i>, <i>Salix serissima</i>, <i>Carex craweii</i>, <i>Eleocharis rostellata</i>, <i>Juncus acuminatus</i>, <i>Kobresia simpliciuscula</i>, <i>Trichophorum cespitosum</i>, <i>Trichophorum pumilum</i>, <i>Cinclidium stygium</i>, <i>Meesia triquetra</i>, and <i>Scorpidum scorpioides</i>. Many of these populations are very large. The Pine Butte Peatlands are possibly the largest peatland complex in Montana. A copy of the Pine Butte Peatlands IPA nomination is enclosed.</p> <p>The Pine Butte Peatlands are fed primarily by sub-surface water from the Teton River moving through intervening alluvial deposits. Maintenance of the functional hydrologic system from the Teton River watershed to the Teton River and surrounding substrates is crucial to the existence of the Pine Butte Peatlands. One potential threat to the Pine Butte Peatlands is oil and gas development. Oil and gas development could directly destroy habitat, disrupt hydrology, or alter and degrade water quality. While there is no BLM surface ownership within the IPA, portions of the IPA are underlain with federally owned minerals. The federal minerals in T24N R8W are subject to a congressional mineral withdrawal, but those in T24N R7W are not. Any decisions regarding federal minerals under the peatlands or in surrounding areas that may affect the peatland hydrology should offer the highest possible protections for these lands, either closure to leasing or no surface occupancy stipulations.</p>
S-0046-02	<p>A second note that is of importance to me is that the Caverns always be associated with the New Year Mine. If this is going to be a tourist attraction, we must use every means possible to lure tourists or visitors to the location. Most visitors will want to see the Caverns. The mine tunnel, if available to them, would be of secondary importance. But there are mining buffs, Old West history buffs (of which I am one) and others to whom mining is a very important endeavor and the association with New Year Mine would increase interest in seeing this feature. The adit or entry tunnel could feature, at its far end, a mining diorama which would include the old mining cart still in there. The tracks would be kept in place and the area well lighted. The diorama or dioramas could tell the story of New Year Mine and of Crystal Caverns.</p>
S-0046-08	<p>Crystal Caverns and New Year Mine should be viewed in a much larger historical context, that of the Judith Mountains and environs. You had two major mining towns there, Maiden and Gilt Edge, and many smaller towns including New Year. Maiden at one point had 3,000 people and was considered, along with Cottonwood and Lewistown, for the Fergus County seat. James Fergus favored Lewistown so you see who won.</p>
S-0046-09	<p>The Judith range is home to a rare fish, it was once home to an Air Force radar station, also a bible school, an historic Girl Scout camp and several major mines like the Gilt Edge, Spotted Horse and Maginnis mines. The Maginnis is owned by a Maiden resident who continues to work it. Hundreds of thousands of dollars of gold and silver came out of those three mines and many others. The New Year Mine was operated for some time but was not a big producer. There also are tales that Spanish gold is hidden in the Judiths awaiting the finder. Of all the island mountain chains in the Lewistown area, the Judiths have the richest history. All of this could be told in dioramas in the adit or elsewhere.</p>
S-0047-01	<p>In addition, the quantity of water needed to hydraulically fracture a well must be incorporated in the EIS. It is the duty of the BLM to consider the geology, hydrogeology and hydrology of every area where oil and gas development may occur.</p>

S-0047-02	<p>First, we are concerned about threats to water quality from oil and gas development. According to the BLM’s factsheet on the revised hydraulic fracturing rule, “Approximately 90 percent of wells drilled on Federal and Indian lands use hydraulic fracturing, but BLM’s current regulations governing hydraulic fracturing operations on public lands are more than 30 years old and were not written to address modern hydraulic fracturing activities” (Attachment 1), Although Montana has regulations that provide for minimal chemical disclosure, most of the chemicals used in oil and gas drilling are kept secret from the public. In addition to these rules, BLM recently released draft chemical disclosure and well stimulation rules¹. We believe that, even though these rules also do not go far enough to protect water quality, they have some good provisions, and the final RMP must include these draft rules.</p>
S-0047-03	<p>One reason chemical disclosure is important is its potential role in adequate baseline water quality testing. Baseline testing is essential to prove that clean water existed before oil and gas development. The state of Wyoming, through its 2013 energy policy titled “Leading the Charge,” recommends “baseline pre-development water quality testing” (Attachment 2). According to Wyoming’s policy statement, “this initiative seeks to establish minimum baseline water quality testing requirements and standards for oil and gas operators prior to development.” The BLM should require that oil and gas companies pay for independent, third-party baseline water quality testing in all federal leases. Since the state of Montana is currently beginning a water budget process, these baseline testing results should also be shared with the state to capture the whole water picture in Montana². Baseline data can help regulators understand when pollution has occurred, as well as the nature of the pollution.</p>
S-0047-04	<p>Although the current public debate focuses on contamination from hydraulic fracturing, other deficiencies such as faulty well casing, cement failure, vicinity to aquifers and surface spills are all major threats to water quality and are the most common ways that water becomes contaminated in drilling operations. In Central Montana, the targeted Heath Shale is within 1000 feet above the Madison Aquifer, and within 1000 feet below the Kootenai formation aquifer. Earthjustice has documented with an interactive map many of the known contamination cases across the US³. However, since the water contamination that the Fort Peck Indian Tribe is facing from old oil wells is not on the map, it is certain that other incidents are also not accounted for. Through the RMP, the BLM should make sure that stronger casing and cementing standards are in place. These standards are currently included in the draft chemical disclosure and well stimulation rules just released by the BLM.</p>
S-0047-05	<p>There are ways to prevent some of this contamination, and neighboring states such as North Dakota have already implemented regulations to do so. According to a recently released report by the Western Organization of Resource Councils (Gone for Good: Fracking and Water Loss in the West, 2013, Attachment 3), “after 47 reserve pits overflowed during the spring thaw of 2011, the state Department of Mineral Resources initiated new rules that essentially eliminated reserve pits at the sites of fracked wells.⁴” This water management practice is called a closed-loop system and is very effective for preventing some water pollution. Interestingly, despite this step forward, the filter socks that have been straining frack water have been exceeding federal radioactivity limits. This is an entirely new threat to our water system and, since the Montana Bakken stems from the same formation, it is a likely threat in Montana as well as North Dakota. The RMP must take these new developments into consideration. One resource could be the draft EPA “Study of the Potential Impacts of Hydraulic Fracturing on Drinking Water Resources.” This study is scheduled to be completed in 2016 and the data collected so far should be addressed in the RMP⁵.</p>
S-0047-06	<p>The disposal of new surface discharge of oil and gas produced water into streams or other flow-connected surface features on BLM administered land should be used in order to fully protect water quality near oil and gas operations. Water protection measures need to be stringent in order to preserve Montana’s precious water system. Overall, if any of our groundwater or surface water is contaminated by drilling chemicals, fracking chemicals, or radioactive waste water there is no turning back. We need to be extremely careful during this process and make sure that the RMP is a guiding document that will protect our supplies of clean water.</p>

S-0047-07	<p>On the other side of the water issue are quantity concerns. Oil and gas development uses large amounts of fresh water. The EPA has estimated that between 70 and 140 billion gallons of water are required annually for fracking⁶. This water is completely lost to the system since it is contaminated with chemicals and much of it is disposed of into deep-injection wells. This is in contrast to agricultural water use. Agriculture is the largest water user in Montana, but the water used is sent back into the overall water cycle. The RMP's goals must be to protect water quality for municipal, industrial, agricultural, recreation, and residential purposes by adopting protective measures to meet federal, tribal, state, and local water quality requirements, however, the importance of water, the impacts to water quantity from oil and gas development must be fully mitigated.</p>
S-0047-08	<p>First, we recommend the BLM document the amount of water available in the system on federal lands. The BLM needs to track the amount of water used for federal oil and gas drilling. Some water resources are being documented on the industry-run website, FracFocus (fracfocus.org). However, from research mentioned in the Gone for Good report from Western Organization of Resource Councils, this data is incomplete. The BLM needs to take the lead on this through the RMP. Additionally, once documented, each well should have monitoring systems to ensure that the actual amount of water being used is accurate. Flow control devices should be installed on all BLM water resources.</p>
S-0047-09	<p>Finally, the BLM must take action to alleviate some of the water loss from oil and gas operations. The RMP should require recycling of drilling and frack water. Oil and gas companies have the technology to do this and, in Pennsylvania, – where there are only a few injection wells in the state and no hazardous waste water treatment facilities – water treatment companies are in high demand (Attachment 4).</p>
S-0047-10	<p>From talking with landowners in the state, royalty rates on BLM leases are far behind market value. Royalty rates for the BLM for onshore minerals are 12.5% for a 10-year lease. Private and state leases range from 16.67% to 20%. The Government Accountability Office (GAO) did a report in 2008 that examined federal royalty and lease practices⁷. This report revealed that the BLM does not do as much as the states to encourage better return on development. Some recommendations that should be taken from this report include shorter lease terms, higher rental rates, higher royalty rates and graduated royalty rates depending on the potential for development.</p>
S-0047-11	<p>Oil and gas development is the second largest polluter (behind wildfires) when it comes to air quality. There are a few steps that the RMP can take to address this. One major impact from oil and gas in terms of air quality is the occurrence of flaring. In Montana, oil and gas wells can flare for an unlimited amount of time, if they produce less than 100,000 cubic feet of gas per day. This is extremely hazardous for the local air quality and contributes the larger threat of climate change. Although there is less development in the Field Office than in the Bakken where much of the flaring occurs, the RMP should still limit flaring and require green completion systems for all federal wells. Fortunately, according to a 2012 GAO report on natural gas emissions on federal lands, “data from EPA, supported by information obtained from technology vendors and GAO analysis, suggest that around 40 percent of natural gas estimated to be vented and flared on onshore federal leases could be economically captured with currently available control technologies.⁸” There is no reason why the BLM could not institute these technologies as conditions on each lease or as an overall RMP policy due to the climate and air quality impacts.</p>
S-0047-12	<p>In terms of climate change, the situation is dire even in a sparsely populated state such as Montana. According to the Billings Gazette, “carbon dioxide emissions rose by more than 11 percent in Montana last decade as the state continued to have one of the highest per capita greenhouse gas emission rates in the country.⁹” This is directly a result of dirty energy development such as coal and oil and gas. The RMP should be a document that seeks to substantively address the increase of climate change emissions. A simple solution would be putting more of the BLM minerals off-limits to leasing or requiring emission capture systems as mentioned in the paragraph above. The BLM needs to use these RMPs to take action on this issue.</p>

S-0047-13	The RMP should not allow the changing of stipulations by application of waivers, exceptions, or modifications. The decision whether to grant waivers, exceptions, or modifications must occur during the Application for Permit to Drill approval process. The lack of public oversight of these waivers is alarming. The BLM should make sure that waivers are not used frequently and when they are used, a 30-day public comment period is always used. The way the public's mineral resources are managed should not be changed without public comment.
S-0047-14	The Montana Bureau of Mines and Geology in conjunction with Montana Tech of the University of Montana are exploring a number of potential sites for frack sand mining. The BLM needs to be monitoring this proposed development and be ready to analyze any of the impacts associated with this mining. A section in the RMP about the potential for development should be included.
S-0047-15	Finally, we are also concerned about sage grouse interaction with oil and gas development. There are some areas of overlap between sage priority protection areas and no surface occupancy oil and gas leases. While the NSO stipulation is a good step forward in some ways, it is concerning that more of the area is not closed to leasing. This needs to be considered since even with a no surface occupancy restriction, well pads and the associated infrastructure (such as roads and pipelines) are still built nearby. From reviewing sage grouse studies, it is clear that setbacks (which is what no surface occupancy essentially is) are just one way to address the issue. According to Oil and Gas Development and Greater Sage Grouse (<i>centrocercus urophasianus</i>): A Review of Threats and Mitigation Measures, "The focus on set-back distances provides only a finite set of options for land managers and permittees alike. Because this approach does not take into account the specific causes of sage grouse avoidance, mortality, or potential population-level effects, it is of limited effectiveness to sage grouse conservation and management. A more comprehensive approach should incorporate performance standards that are based on an understanding of specific causes and effects of oil and gas infrastructure impacts on sage grouse (i.e., noise, predation, disease), as well as consideration of habitats other than leks (i.e., nesting, brood rearing, and winter habitats)."
S-0049-01	We recommend that the RMP/EIS consider and disclose the potential environmental effects of oil and gas development in the planning area and determine whether there is a need to revise standards and guidelines (including leasing stipulations) to minimize the potential impact of oil and gas development. We understand that since this will be a programmatic analysis, site specific projects are not being considered or approved.
S-0049-05	It is important to characterize both the existing and potential groundwater drinking water resources in the planning area. We recommend the RMP/EIS include the following information: <ul style="list-style-type: none"> • A description of all aquifers in the study area, noting which aquifers are Underground Sources of Drinking Water (USDW s). Federal Safe Drinking Water Act regulations define a USDW as an aquifer or portion thereof: (a)(1) which supplies any public water system ; or (2) which contains a sufficient quantity of ground water to supply a public water system; and (i) currently supplies drinking water for human consumption; or (ii) contain s fewer than 10,000 mg/1total dissolved solids; and (b) which is not an exempted aquifer (See 40 CFR Section 144.3); • Available water quality and water yield information for each aquifer; • Maps depicting the location of sensitive groundwater resources such as municipal watersheds, source water protection zones (available from the Montana Department of Environmental Quality-MDEQ, Joe Meek -see contact information below in comment #5), sensitive aquifers, and recharge areas; • Descriptions and locations of groundwater use (e.g., public water supply wells, domestic wells, springs, and agricultural and stock wells. Also see comment #5 below; and • A map and discussion of proposed wells, existing producing wells, and nonproducing wells in the area including their status (e.g., idle, shut-in, plugged and abandoned), if available. Please refer to the Montana Board of Oil and Gas Conservation for location and abandonment information.

S-0049-06	<p>The EPA recommends that the RMP/EIS analyze potential impacts to groundwater quality and quantity related to resource extraction such as mining and oil and gas production. Potential impacts include those associated with the following: leaks and spills; production and disposal of produced water or processing waters; use of pits, underground injection control (UIC) wells, tailing ponds, infiltration basins and evaporation ponds; production wellbore integrity; closure requirements; pipeline use; and impacts associated with restimulation and abandonment of existing wells. The EPA also recommends that the RMP/EIS discuss measures the BLM will require at the project level to minimize the potential for these impacts to occur and how the operations will be monitored to determine if the mitigation measures are effective.</p>
S-0049-07	<p>Specifically, the EPA recommends that the BLM analyze and disclose potential groundwater protection, monitoring and mitigation measures, including:</p> <ul style="list-style-type: none"> • BMPs and measures such as water reuse, closed loop drilling, lining of evaporation ponds, monitoring of water quality and water levels, closure and monitoring of tailings ponds, reserve pits and evaporation ponds; • Setback stipulations, such as No Surface Occupancy (NSO), to minimize the potential for impacts to potential drinking water resources, including domestic water wells and public water supply wells. Setbacks are effective health and environmental protection tools because they provide an opportunity for released contaminants to attenuate before reaching a water supply well. They may also afford an opportunity for a release to be remediated before it can impact a well, or for an alternate water supply to be secured. For these reasons, we recommend that the BLM require a minimum 500 foot NSO setback from private wells. We note that a number of states including Colorado and North Dakota have adopted a 500 foot setback from occupied dwellings (and by default, the associated domestic well). The EPA also encourages the BLM to consider sourcewater protection zones delineated by the MDEQ when evaluating the basis and need for setbacks from public water supply wells (see comment #5 below) ;
S-0049-08	<ul style="list-style-type: none"> • A mitigation plan for remediating future unanticipated impacts to drinking water wells, such as requiring the operator to remedy those impacts through treatment, replacement, or other appropriate means;
S-0049-09	<ul style="list-style-type: none"> • Abandonment procedures for sealing wells no longer in use in order to reduce the potential for inactive wells to serve as conduits for fluid movement between production zone(s) and aquifer(s). This is particularly important where existing wells do not have surface casing set into the base of USDWs and lack sufficient production casing cement.
S-0049-24	<p>We recommend that the RMP/EIS include a general discussion of the following:</p> <ul style="list-style-type: none"> • A range of water demand per well developed in the planning area (based on predicted well depths, formation characteristics, and well designs, as well as hydraulic fracturing operations, if used); • Possible sources of water needed for oil and gas development; and • Potential impacts of the water withdrawals (e.g., drawdown of aquifer water levels, reductions in stream flow, impacts on aquatic life, wetlands, and other aquatic resources).
S-0049-25	<p>In addition, the EPA recommends the RMP/EIS include a general discussion of how flow back and produced water will be managed including:</p> <ul style="list-style-type: none"> • Estimated volume of produced water per well; • Options and potential locations for managing the produced water (i.e., UIC wells, evaporation ponds, and surface discharges); • Possible target injection formations, formation characteristics and depth of any UIC wells; and • Potential impacts of produced water management.
S-0049-26	<p>The EPA also recommends the BLM encourage operators to consider recycling produced water for use in well drilling and stimulation, thereby decreasing the need for water withdrawals and for produced water management/disposal facilities and minimizing the associated impacts.</p>

S-0049-27	The EPA recommends that the RMP/EIS address how water quality monitoring in the planning area will occur prior to, during, and after anticipated development to detect impacts to both surface water and groundwater resources, including private well monitoring. A recent example of a water quality monitoring plan is the "Long-Term Plan for Monitoring of Water Resources" developed by BLM for the Gasco Energy Inc. Uinta Basin Natural Gas Development Project Final EIS. ² Also, the National Ground Water Association 's Water Wells in Proximity to Natural Gas or Oil Development Brief ³ provides information on the importance of baseline sampling for private wells and types of analysis recommended.
S-0049-36	As you know, the EPA provided comments to the BLM LFO in a February 5, 2014 letter regarding the BLM's Draft RMP Amendment/EIS for the Greater Sage-Grouse. Through that review, we understood that revisions to the oil and gas leasing stipulations for greater sage-grouse protection were being deferred to the full RMP/EIS analysis (which is now being scoped) when all oil and gas leasing stipulations would be reviewed. We have enclosed our February 5, 2014 comments for your use as they pertain to the oil and gas leasing stipulations that will be assessed through this full RMP/EIS analysis.
S-0051-14	Mineral and Energy Development <ul style="list-style-type: none"> • Agree with Planning Questions and Planning Considerations at this time
S-0052-05	Energy independence is important and leasing of federal minerals should be allowed.
S-0054-08	No Surface Occupancy stipulations required for any new fluid minerals leasing, with no option for exceptions or modifications. (California-Nevada RMP Amendment).
S-0054-09	Allow only heliportable geophysical exploration, with timing limitations applied. (North Dakota RMP Amendment, Bighorn Basin RMP Revision).
S-0054-11	Timing Limitations should apply to surface disturbing and disruptive activities.
S-0054-12	Find Priority Habitats unsuitable for coal leasing. (North Dakota RMP Amendment, HiLine RMP Revision, Northwest Colorado RMP Amendment).
S-0054-13	Close Priority Habitats to energy and non-energy leasable minerals leasing. (HiLine RMP revision, California-Nevada RMP Amendment).
S-0054-14	Close Priority Habitats to salable minerals development. (North Dakota RMP Amendment, Nevada – Northeast California RMP Amendment)
S-0054-35	Find unsuitable for coal surface mining. (NW Colorado RMP Amendment).
S-0054-38	Bury new distribution lines within 1 mile of leks. (HiLine RMP revision).
S-0055-02	I realize that development for industrial use is a legitimate use of our public land. With the vast amount of land already developed, I'd like to see future development limited to areas that do not abut critical wildlife habitat and do not affect the potential for primitive, non-motorized recreation.
S-0058-02	Oil and gas companies are enjoying their Bakken playground in next-door North Dakota, at the same time as thousands of private acres have been taken out of the Conservation Reserve Program and converted to cropland. These two contextual facts mean it is even more critical than usual that your RMP provide balance in Montana. We urge you to consider this wider context as you write the "Affected Environment" section of your Draft RMP. We would also respectfully ask that you incorporate citizen wilderness inventories in your planning process.
S-0058-06	We would like BLM to identify places where industrial activities like oil and gas wells, pipelines, wind farms, and mines will have the least impact, and to direct development there. We would also urge you to prepare a Master Leasing plan for any areas in the Field Office where oil/gas potential and wilderness characteristics or critical sage-grouse habitat overlap.
S-0059-16	The BLM should identify zones and opportunities for renewable energy projects and then limit development to those zones. These zones should be characterized by high-resource, low-conflict areas that are on already degraded lands and near existing infrastructure. These zones should also include adequate protective measures and mitigation efforts.
S-0059-17	We encourage the BLM to look for ways to minimize conflict with potential lands with wilderness characteristics. This includes analyzing the suitability of units for closures, NSO, and CSU stipulations for specific units. Also, please analyze the suitability of these potential LWCs as ROW exclusion or avoidance zones.

S-0059-18	<p>Master Lease Plans are a new and effective method of resolving conflict in areas of competing interests and uses. This field office has many areas that have competing and conflicting interests and an MLP could adequately address them. The current resources we see that are in conflict include: greater sage-grouse, lands with wilderness characteristics, hunting and fishing, and oil and gas development. Not all of those interests are in direct conflict with each other. However, based on fluid minerals, wildlife data, and potential lands with wilderness characteristics, we would like to nominate the following regions:</p> <ul style="list-style-type: none"> · Southeast in the planning unit. This is the area south of Highway 200 and east of Highway 87. This includes the Elk Creek PLWC, Pike Creek PLWC, Cemetary Road PLWC, Cat Creek PLWC, and Cottonwood Creek PLWC units. This area has high conflict between recreational opportunities and oil and gas development. · Northcentral in the planning unit. This is the area north of Winifred including Chimney Bend PLWC, Woodhawk Creek PLWC, Dry Armells PLWC, and Armell's Creek PLWC. This region has high conflict between wildlife and habitat and oil and gas, and oil and gas development and recreational opportunities. · Western portion of the unit along the Rocky Mountain Front. This area includes Blind Horse Creek PLWC, Ear Mountain PLWC, Chute Mountain PLWC, Deep/Battle Creek PLWC, Beaver Meadows PLWC and the North Fork of the Sun River WSA. This has high conflict between oil and gas development and wildlife habitat, and oil and gas development and recreational opportunities.
S-0060-02	<p>As the BLM moves forward in developing the Lewistown draft RMP by considering planning issues and proposing allocations, we ask that you identify and conserve identifiable tracts of land that are generally intact and undeveloped and that have high quality fish and wildlife habitat and dispersed recreation opportunities. We request that you designate or provide special emphasis to these areas in the Lewistown RMP and manage them as "backcountry conservation areas" (BCAs), to conserve and restore unfragmented fish and wildlife habitat and provide dispersed hunting and fishing opportunities. The TRCP is working with local sportsmen and women, professional wildlife managers, and hunting and wildlife conservation organizations to identify specific intact and undeveloped lands within the BLM Lewistown District that are appropriate for BCA management, and in follow up to these comments, we will provide supplemental recommendations that nominate specific areas within the Lewistown Field Office as BCAs. Application at the RMP level: The following table provides specific examples of the appropriate allocations or management approaches that should be applied in the Lewistown RMP when adopting BCAs. Resources BCA Resource Decisions</p> <p>Fish and Wildlife Habitat and Noxious Weeds: Establish objectives for management activities that conserve, restore, maintain and enhance fish and wildlife habitat, control and manage noxious weeds, and restore forests and rangelands.</p> <p>Fluid Minerals: Lands would be open to new leasing subject to No Surface Occupancy (NSO) stipulations.</p> <p>Locatable Minerals: BCA lands are generally not intended to be withdrawn from operation of the general mining laws. Reasonable efforts will be made to reduce and reclaim surface disturbances from exploration and mining activities and prevent the fragmentation of intact habitats within BCAs, while allowing for existing rights to be exercised.</p>
S-0062-04	<p>I believe the District Manager indicated during the scoping meeting in Lewistown that he might consider opening more lands to fluid mineral leasing. I am not sure what has changed since the Headwaters and JVP RMPs were prepared. Both of those plans were developed during administrations that were fairly friendly to oil and gas leasing. I hope you use caution if you consider leasing areas that are now closed or "no surfaced occupancy".</p>

S-0065-03	Plan for industrial development (i.e. pipelines, wind farms, communication towers, mines) on public land in a way that prioritizes minimal habitat disturbance. This does not oppose all development, but rather encourages a land management strategy that gives equal weight to ecosystem and economic concerns. As the “Last Best Place” Montana has the unique characteristic of minimally developed public lands that can still be utilized for recreational activities without signs of human development. However, prioritizing economic concerns over ecosystem values will result in the eventual erosion of these natural spaces.
S-0070-01	I have always felt at home in Central Montana's open country and would like to see more of this land protected as wilderness. As more people use roadless and wilderness areas for recreation more BLM land will be needed to provide quiet recreation. I urge the BLM to carefully inventory their roadless lands with an eye to protecting more of the magnificent wild country. This should be done before increasing energy development.
S-0073-03	Stipulations need to be developed to protect remaining populations of native trout in the planning area from the impacts of oil and gas activities. We recommend that, similar to the Butte Field Office, a ½ mile No Surface Occupancy (NSO) stipulation apply to streams with conservation populations of Westslope cutthroat trout. Additionally, the Butte Field Office includes ½ mile NSO buffer for streams with the potential for reintroduction of cutthroat trout. MTU suggests that the Lewistown Field Office incorporate similar stipulation in order to protect future restoration opportunities and to ensure consistency between sister field offices.
S-0073-04	<ul style="list-style-type: none"> • Collar Gulch ACEC: Collar Gulch Creek currently supports an at-risk population of genetically pure Westslope cutthroat trout that represent the eastern-most population of Westslope cutthroat trout. Given the size of this population and the limited amount of available habitat, this unique population is at risk for extirpation and any habitat degradation – or risk of degradation – is unacceptable. For this reason, MTU request that all BLM lands and subsurface minerals within the entire Collar Creek watershed be designated as an ACEC. We also request that these lands be strictly managed for non-degradation, including closing the ACEC to oil and gas leasing, mineral activity and other uses that could result in the degradation of water quality or other impacts to this irreplaceable population of native trout.
S-0073-05	<ul style="list-style-type: none"> • Impacts to Blue and Red Ribbon Streams: The impact of oil and gas activities on Blue Ribbon and Red Ribbon (Class I and II) trout streams and the significant recreational benefits these waters provide anglers should be analyzed. Class I and II streams in the Lewistown Field Office include Big Spring Creek, Missouri River and the Smith River.
S-0073-06	<ul style="list-style-type: none"> • Protections for Blue and Red Ribbon Streams: MTU request that the BLM develop stipulations for oil and gas activities that protect health of Class I and II streams, as well as the quality of experience for anglers who frequent these destination fisheries. For instance, the Billings Field Office is considering the application of ½ mile NSO stipulations for both Class I and II streams. In order to protect water quality and the quality of experience that these streams provide, we request that the Lewistown Field Office adopt the same level of protection.
S-0073--07	<ul style="list-style-type: none"> • Protections for Perennial Streams: MTU supports a ¼ mile NSO buffer for all perennial streams. Doing so would protect tributary streams that serve as spawning habitat for Class I and II streams, as well as productive trout streams that are not designated Class I or II (e.g. the Sun and Dearborn Rivers.) The effects of oil and gas development along tributaries stream can be just as harmful as the effects of the designated stream sections; after all, sediment and spills flow downstream. The only way to truly protect a fishery is to protect the entire watershed, including tributaries. Moreover, there are important warm water fisheries that might not be significant recreationally, but that have biological importance. Without a buffer for all perennial streams, these resources would lack a significant degree of protection.
S-0073-08	Any exceptions, modifications or waivers to stipulations must have concurrence with Montana Fish Wildlife and Parks. Given that BLM is the land manager, but that Fish Wildlife and Parks manages fish and wildlife resources, it is imperative that the agency responsible for managing the resource concur with any determination that a lease exception, modification, or waiver will not adversely affect the resource.

S-0073-09	Stream buffers (i.e. ½ mile NSO stipulations) are linear in profile, meaning that it is feasible to utilize directional drilling technologies to access all of the oil and gas that might underlie these NSO buffer areas. When evaluating the effect of stream buffers on mineral development, we suggest that BLM incorporate this principle into the environmental analysis.
S-0073-10	The environmental analysis should identify the potential impacts oil and gas development will have on fisheries, including conservation populations of Westslope cutthroat trout, impacts to streams with potential for the restoration and reintroduction of Westslope cutthroat trout, and impacts to Class I and II streams. Additionally, this analysis needs to consider that there are two potential sources of impacts from oil and gas development: 1) surface disturbances and associated erosion and sedimentation, and 2) contamination from spills and other accidental releases of chemicals and wastes associated with drilling and production and activities. Any development within a watershed introduces the risk of a spill and the resultant impacts to aquatic habitat and fisheries; these impacts can range from minimal to catastrophic depending on the severity of a given spill. The dual nature of oil and gas impacts (sediment and spills) emphasizes the need for ½ mile NSO stream buffers – the greater the spatial separation between oil and gas development and surface waters, the less chance that a spill will reach and impact a given water body.
S-0073-13	The BLM has the authority to apply resource protection stipulations to split estate lands and it is imperative that resource protection measures for oil and gas development are applied regardless of surface ownership. While the BLM does not have the legal authority in split estate situations to regulate how a surface owner manages his or her property, the agency does have the statutory authority to take reasonable measures to avoid or minimize adverse environmental impacts that may result from federally authorized mineral lease activity. Moreover, in order to meet the consistency requirements of FLPMA, the BLM is legally required to apply the same standard of environmental protection to split estate lands as to federal surface.
S-0080-02	Industrial activities should be carefully considered and not just given carte blanche access or development rights where they don't already exist. Especially fracking for oil and gas or any other activities that will damage the land or water. Industrial activities should be placed where they will do the least damage and maintained in corridors with other development.
S-0086-01	When preparing the Lewistown RMP, it would be inappropriate for BLM to make site-specific decisions; rather, the RMP is suitable for determining only broad management goals and objectives. Further, it is beyond the scope of the planning process for BLM to analyze the potential impacts of oil and gas development on a site-specific basis because such projects will be analyzed on a case-by-case basis if and when operations are actually proposed. Based on the BLM's own policies and binding legal precedent, the BLM should ensure that the agency does not utilize the land use planning process to impose site-specific conditions of approval or unreasonably limit future management actions when revising the Lewistown RMP.
S-0086-02	The BLM Must Manage the Lewistown Field Office for Multiple Use - Including Oil and Gas Development: The development of oil and gas resources from public lands is a highly important part of the BLM's responsibilities. See 43 USC§ 1702(1), which defines mineral exploration and development as a principal or major use of public lands. Under FLPMA, the BLM is required to manage the public lands on the basis of multiple use and sustained yield. While "multiple use management" may be a deceptively simple term, its objective is to strike a balance among the many competing uses to which land can be put, including, but not limited to, recreation, range, timber, minerals, watershed, wildlife and fish, along with natural scenic, scientific and historical values. We recognize the difficult task the BLM faces to manage public lands in the Lewistown Field Office for multiple use. Nevertheless, we encourage BLM to remember that oil and gas development is a fundamental part of the BLM's multiple use mandate and that it is vital for BLM to ensure that oil and gas development is not unreasonably limited in the RMP revision process.

S-0086-03	<p>When revising the Lewistown RMP, BLM must ensure that stipulations developed for oil and gas leasing are the least restrictive necessary to adequately protect other resource values. Congress passed the Energy Policy Act of 2005 and Section 363 of that Act required the Secretary of the Interior and the Secretary of Agriculture to enter into a Memorandum of Understanding regarding oil and gas leasing and to ensure that lease stipulations are applied consistently, coordinated between agencies, and "only as restrictive as necessary to protect the resources for which the stipulations are applied." The Memorandum of Understanding required by § 363 of the Energy Policy Act of 2005 was finalized in April of 2006 as BLM MOU W0300-2006-07. The stipulations for oil and gas leases within the revised Lewistown RMP must not be onerous or more restrictive than necessary and must be scientifically justified. This is particularly important since leases have not been issued in the planning area for three decades.</p>
S-0086-04	<p>The National Environmental Policy Act of 1969 ('NEPA) requires an agency only to consider "reasonable alternatives." 40 C.F.R. § 1502.14 (2010). NEPA does not require agencies to analyze the environmental consequences of alternatives that are too remote, speculative, or impractical or ineffective. When developing alternatives for the Lewistown RMP and accompanying environmental impact statement (EIS), BLM must ensure that the alternatives analyzed are in keeping with the requirements of The Council on Environmental Quality (CEQ), which has described reasonable alternatives in its "Forty Most Asked Questions" as "those that are practical or feasible from the technical and economic standpoint and using common sense, rather than simply desirable." Clearly, BLM must avoid analyzing speculative, impractical, or uneconomic alternatives. Specifically, overly stringent restrictions or conditions of approval (COA) that may render development uneconomic must also not be analyzed. Further, given the fact the public lands must be managed for multiple uses, including oil and gas development, alternatives that prohibit or eliminate all oil and gas development within the area are neither practical nor reasonable and need not be studied in detail by the agency.</p>
S-0086-05	<p>The RMP Revision Process Should Not Impact Ongoing Operations, Development on Existing leases, or Pending Development Projects: Oil and gas development activities must not be prohibited during the planning process. The notion that the BLM may suspend all management decisions while a RMP is being revised has been rejected by numerous federal courts and the ISLA. Neither FLPMA nor the applicable regulations require BLM to institute a moratorium on activities pending completion of an EIS for an updated or revised RMP. Instruction Memorandum 2001-191 directs that "Actions that may appear to reduce a lessee's right to reasonably develop a lease should be cleared through the State Director and Regional Solicitor's Office ... When an RMP is being amended or revised, BLM will continue to process site-specific permits, sundry notices, and related authorizations on existing leases in an expeditious manner while ensuring compliance with NEPA and other laws, regulations, and policies." Consequently, BLM must not limit or restrict oil and gas development during the amendment process.</p>

S-0086-06	<p>The BLM Does Not Have the Authority to Regulate Air Emissions in Montana: We recognize that BLM intends to will summarize all relevant background air quality and climate information associated with the planning area and identify all potentially affected Class I areas as well as actions that could be taken to protect these areas during the RMP revision process. We also understand that BLM will identify area-wide criteria or restrictions that would be applied to any activity authorized by the field offices to ensure compliance with all local, state, federal, or tribal air quality standards and implementation plans..." We also understand that BLM will comply with procedures in the Memorandum of Understanding among the U.S. Department of Agriculture, U.S. Department of the Interior and U.S. Environmental Protection Agency, regarding air quality analysis and mitigation for federal oil and gas decisions through the NEPA process which was signed on July 23, 2011. Nevertheless, we remind BLM that it does not have direct authority over air quality or air emissions under the Clean Air Act ("CAA"). 42 U.S.C. §§ 7401 et seq. Under the express terms of the CAA, the Environmental Protection Agency (EPA) has the authority to regulate air emissions. In Montana, the EPA has delegated its authority to the Montana Department of Environmental Quality (MDEQ). The Interior Board of Land Appeals (IBLA) has equivocally determined that the State and not the BLM, has authority over air emissions. Specifically, IBLA found that ensuring compliance with Federal and State air quality standards, setting maximum allowable limits (NAAQS and WAAQS) for six criteria pollutants CO (carbon monoxide), SO₂ (sulfur dioxide), NO₂, ozone and particulate matter (PM₁₀ and PM_{2.5}), and setting maximum allowable increases (PSD Increments) above legal baseline concentrations for three of these pollutants (SO₂, NO₂, and PM₁₀) in Class I and Class II areas is the sole responsibility of the State through MDEQ with oversight from EPA.</p>
S-0086-07	<p>With respect to potential visibility impacts, the BLM's authority is also limited by existing federal law. Under the CAA, a federal land manager's authority is strictly limited to considering whether a "proposed major emitting facility will have an adverse impact" on visibility within designated Class I areas. 42 USC § 7475(d)(2)(B) (2010). Oil and gas operations do not meet the definition of a major emitting facility. Further, under the CAA, the regulation of potential impacts to visibility and authority over air quality in general, rests with the MDEQ. 42 USC§ 7407(a) (2010). The goal of preventing impairment of visibility in Class I areas will be achieved through the regional haze State Implementation Plans (SIPs) that are being developed. Although federal land managers with jurisdiction over Class I areas may participate in the development of regional haze SIPs, BLM has no such jurisdiction in Montana. Accordingly, BLM has no authority over air quality and cannot impose emissions restrictions, either directly or indirectly, on oil and gas operations in Montana, particularly if the overall goal is to reduce potential visibility impacts. Rather than attempting to regulate air quality in the Lewistown RMP, we encourage BLM to participate in and abide by the regulatory processes currently underway in Montana. Any attempt by the BLM to regulate air quality could lead to inconsistent, confusing, and possibly illegal standards.</p>
S-0086-08	<p>BLM states under its Preliminary Planning Considerations, "conservation measures described in the Greater Sage Grouse RMP amendment EA will be incorporated upon completion." As explained in our comments on the GRSG amendment EA, the management strategies outlined in the EA far exceed what is needed to ensure sufficient regulatory mechanisms will exist in the future. Of primary concern is that implementation of the EA's Preferred Alternative would severely inhibit BLM's statutory mission and seriously compromise land users' ability to continue historic uses of public lands. While we supported the Lewistown FO's intention to maintain site-specific flexibility when utilizing the RDFs outlined in Appendix D of the EA, we remain concerned and object that many of these requirements are overly prescriptive, have no scientific basis and reflect a lack of understanding valid existing rights, operational considerations and technical feasibility. The primary reason for these excessive strategies is due to serious flaws in the data relied upon in the planning documents, which were discussed in detail in our comments on the EA.</p> <p>We reiterate that neither NEPA nor the Endangered Species Act (ESA) amend or alter the agency's statutory mission of multiple-use. Nor can this plan revision impact valid existing rights. Any process established for managing GRSG habitat must not conflict with BLM's duties and authorities under FLPMA and the Mineral Leasing Act.</p>

S-0086-09	<p>In addition, we recommend that for other species, BLM ensure its management objectives and methods are consistent with those of the US Fish and Wildlife Service (USFWS). Specifically, management for species not listed as threatened or endangered must not exceed that which is recommended by the Service. An example would be the Mountain Plover. In May 2011, the USFWS determined that listing the mountain plover under the ESA was not warranted, estimating that "the current mountain plover breeding population to be over 20,000 birds, more than double the estimate cited in [its] 2002 proposal." In addition, the Service concluded that "despite the prevalence of energy development activities throughout the range of the mountain plover, there is little evidence as to whether, or to what extent, the overall effects of energy development are detrimental to mountain plover (Andres and Stone 2009, p. 25). Although oil and gas field development modifies and fragments nesting, brood rearing, and foraging habitats, mountain plover continue to use these areas (Smith and Keinath 2004, p. 36; Carr-, in review)" 76 FR 27782. As such, prohibiting fluid mineral leasing or adding NSO stipulations in the planning area to protect the plover would fail to correspond with the FWS' listing determination for the species and would not be justified through any peer-reviewed science since that decision was made. Any NSO stipulations proposed for oil and gas leasing in areas within habitat of unlisted species would be arbitrary and capricious.</p>
S-0086-10	<p>It is unclear why BLM failed to identify the recognition and protection of valid existing rights as an issue in the preparation plan for the revision of the Lewistown RMP. When revising the RMP, the BLM must also acknowledge existing rights, including oil and gas lease rights. Once the BLM has issued a federal oil and gas lease without no surface occupancy stipulations, and in the absence of a nondiscretionary statutory prohibition against development, the BLM cannot completely deny development on the leasehold. Only Congress has the right to completely prohibit development once a lease has been issued. Congress made it clear when it enacted FLPMA that nothing in the act, or in the subsequently developed land use plans, was intended to terminate, modify, or alter any valid or existing property rights. In adherence to this purpose, BLM promulgated policies regarding the contractual rights granted in an oil and gas lease. BLM Instruction Memorandum 92-67 states that "the lease contract conveys certain rights which must be honored through its term, regardless of the age of the lease, a change in surface management conditions, or the availability of new data or information. The contract was validly entered based upon the environmental standards and information current at the time of the lease issuance." As noted in the BLM's Instruction Memorandum, the lease constitutes a contract between the federal government and the lessee which cannot be unilaterally altered or modified by the BLM.</p> <p>In the revised Lewistown RMP and accompanying EIS, we advise that BLM emphasize that an oil and gas lease is a contract between the federal government and the lessee, and that the lessee has specific rights. BLM recently recognized the nature of existing oil and gas lease rights in the Pinedale RMP issued in November of 2008. "Existing oil and gas or other mineral lease rights will be honored. When an oil and gas lease is issued, it constitutes a valid existing right; BLM cannot unilaterally change the terms and conditions of the lease ... Surface use and timing restrictions from this RMP cannot be applied to existing leases." Pinedale RMP, 2-19. Similar language exists in the December 2008 Rawlins RMP, pg. 20. We encourage the Lewistown BLM to include similar language in its RMP.</p>
S-0086-11	<p>BLM is required under 43 CFR § 1610.4-4 (g) to analyze the level of dependence of local communities on resources from public lands during land use planning. As such, the BLM Land Use Planning Handbook (H-1601-H) and Instruction Memorandum No. 2002-167 each address social and economic analysis for land use planning. Factors required to be analyzed include: demographic, economic, social and fiscal conditions and land use patterns. In addition, existing conditions and trends, as well as the impacts to conditions and trends associated with each alternative must be assessed along with the income and employment associated with all economic sectors, community infrastructure, state and local revenues and expenditures, and land use patterns. Further, NEPA requires analysis of socio-economic impacts in order to ensure that agency decisions do not result in a financial burden upon the communities which rely on public lands for their livelihoods and revenue. It is crucial for the Lewistown economic impact analysis to directly recognize that the economic benefits to local communities and the State of Montana from oil and gas development will decrease proportionately due to the limitations imposed on future oil</p>

	and gas development by BLM.
S-0087-06	We are also greatly concerned with the impacts of climate change and how federal land management actions may be contributing to climate change. Not only does the development of solid minerals, fluid minerals, and energy fragmentation and reduce habitat for wildlife, fish, and native plants, this type of development can contribute to climate change. For example, native plant communities are known to sequester carbon and ameliorate climate. Surface disturbance and occupancy reduces the ability of native plant communities to provide climate regulating ecosystem services. Emissions that result for fluid minerals contributes directly to climate change through increased radiant forcing. Although, these types of actions may seem limited to the region the effects of climate change impact the globe. Therefore, we do not support actions posed by the BLM that contribute to positive radiant forcing. We do support actions that help mitigate the effects of climate change. For example, establishing management actions and objectives to promote climate regulating ecosystem services and maintenance and enhancement of large landscapes dominated by native vegetation. To better help you understand our position on climate change we have attached our Climate Change Policy.

PALEONTOLOGICAL RESOURCES (PR)

COMMENT NUMBER	COMMENT RELATED TO PALEONTOLOGICAL RESOURCES (PR)
S-0044-04	Federal minerals underlie the Egg Mountain dinosaur site owned by Museum of the Rockies, the surface of which is also protected by the Nature Conservancy conservation easement. This site is one of the most significant paleontological localities in the country, and may be eligible for future listing on the National Register of Historic Places. Other federal minerals occur within the same geological formation and likely have important paleontological resources as well. Potential impacts of mineral activities to these paleontological and historic resources should be addressed in the RMP, including appropriate stipulations to protect these resources.

PUBLIC SAFETY (PS)

COMMENT NUMBER	COMMENTS RELATED TO PUBLIC SAFETY (PS)
S-0046-05	BLM has made clear that public use of Crystal Caverns and New Year Mine will be by guided tour only. This is as it should be to protect the resources inside the Caverns especially. BLM would have to construct a "catwalk" possibly with railings to keep people on one path and keep them away from sensitive features. This kind of walkway is needed because the floor of Crystal Caverns is very muddy. BLM might also require that everyone entering wear a hardhat and protective coverings of their shoes. These items could be provided at the entrance.
S-0049-15	In order to ensure that public drinking water supply sources (e.g., surface water sources, including groundwater under the direct influence of surface water (GWUDISW) sources, and groundwater sources) are protected from potential impacts associated with BLM-authorized activities in the planning area, it is important to identify where these sources are located. Therefore, the EPA recommends that the RMP/EIS include a map delineating source water protection areas for public water supply wells. We also recommend identifying reservoirs that are drinking water sources and disclosing potential impacts to these sources.
S-0049-16	In order to ensure public drinking water supply sources (e.g., surface water sources, including GWUDISW sources, and groundwater sources) are protected from potential impacts associated with resource extraction, the EPA recommends the following NSO language: Municipal Supply Watersheds ¹ - NSO within any of the following areas, as deemed appropriate by the BLM:

	<ul style="list-style-type: none"> • The entire watershed ; or • Local Source Water Protection Planning Areas where delineated in a Source Water Protection Plan; or • Surface Water Spill Response Region or Groundwater Inventory Region defined by Source Water Assessments that have been delineated or evaluated by the State. <p>Surface Water Spill Response Regions are ½-mile-wide zones (on both sides of rivers or streams, upstream of drinking water intakes. They include the water body with the surface water intake and significant tributaries, for 10 miles upstream of the drinking water intake. For lakes and reservoirs, they include a ½-mile-wide zone around the water body.</p> <p>Groundwater Inventory Regions are based on a three-year time of travel or a fixed radius of 1,000 feet (concentric buffer) around the public water supply well or spring.</p>
S-0049-17	For surface water sources, if the Municipal Supply Watersheds NSO stipulation is not deemed feasible by the BLM, then at a minimum we recommend a 1000-foot NSO or Controlled Surface Use (CSU) setback on both sides of the river or stream, for 10 miles upstream of the intake. For lakes and reservoirs, this would include a 1000-foot NSO or CSU setback around the water body.
S-0049-18	For groundwater and GWUDISW sources, if the Municipal Supply Watersheds NSO stipulation is not deemed feasible by the BLM, we recommend a minimum 1,000-foot CSU concentric buffer for these sources.
S-0049-19	The EPA also recommends the BLM include a commitment in the Final EIS and Record of Decision to provide notice to lessees regarding these important areas in the planning area.
S-0050-01	I was in the the New Year mine cave (the Crystal Cave) last summer. It is spectacular and should eventually be opened to the public. Fortunately, there are no protected bats or other wildlife residing in the mine workings or cave so we humans should be allowed to enjoy it. I understand it would likely require extending a hiking trail from the existing Lime Kiln trail system for visitor access by foot. A qualified guide would likely be required to escort visitors into the underground workings and cave; both for safety and security purposes. Rules and guidelines would have to be developed. Possibly qualified volunteers could serve as guides. Tours could be set on a schedule - say once per month in the summer and possibly also by appointment. Vehicular (ATV, four-wheeler) access beyond the end of the existing public road should be obtained from New Year Gulch property owners. This could be a stipulate and restricted access allowing the "guide and other authorized personnel" the option and ease of vehicular access rather than having to hiking in; provide emergency access; and a means for getting supplies, tools, and such to the adit site. As an experienced underground miner, and familiar with other caves in the Judith's, I could be willing to help out with this project.
S-0050-04	The Maiden Forestry project took off a number of years ago under the experienced leadership of BLM Forester, Bruce Reed. The quality of work that was done on the slopes of Maiden Peak and around Camp Maiden was very good and certainly reduced wildfire fuel loads. The project fell dormant due to the necessary remediation of the Lime Kiln Canyon blow-down event. The Maiden Forestry project should be rejuvenated and move forward both for wildfire fuel reduction, public safety in the event of a wildfire, and good forestry stewardship. I was involved with the project and would lend my assistance again. Spotted Knapp weed flourishes in places along the Judith Peak Road and on Big Grassy Peak. Can this be better addressed in the future?
S-0062-05	At the same time, the District Manager stated he did not foresee closing very many roads. I don't have any specific roads to recommend closing, but I would ask that you look seriously at road gradient and potential for soil erosion when considering which roads to leave open. There are a couple of roads in the monument that I can think of that are very steep and never should have been left open (the road down to Hole-in-the-Wall and the Bullwhacker Road where it drops down to the river). Roads such as these are dangerous and are highly susceptible to erosion. OHV on some other roads contributes to the spread of noxious weeds.

S-0066-01	The first issue to be addressed is Public Safety! This has to do with a piece of BLM land that dissects deeded lands, a county road splits this north and south. We have been here almost 30 years, with little or no problems. In the past 5 years however, problems have escalated into nightmares - loss of livestock due to gunshot (documented by the Montana Dept. of Livestock, constant trespass of deeded lands, hunter/hunter conflicts, wildlife & livestock harassment, hunter/landowner conflicts and miles of extra fence repair. Our ranch headquarters are within ½ mile of this conflict area causing concern for our own safety! Also the garbage is of concern. There are also law enforcement/landowner confrontation which was documented and vindicated.
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RECREATION AND VISITOR SERVICES (RV)

COMMENT NUMBER	COMMENTS RELATED TO RECREATION AND VISITOR SERVICES
S-0001-05	This is national land, not state land. The MT State Fish & Game grows wildlife to kill it. That is not national policy. MT game agency is a vicious manipulative game agency working solely for gun wacko pleasure at killing. I oppose all wildlife murder on this site. Animals need peace and tranquility to survive with climate change coming.
S-0003-04	I really like hiking in the breaks and prairie along the Musselshell and Missouri Rivers. I love the big sky here, the extremes in weather and the feeling that this is what Montana was a couple hundred years ago. Please restrict motor vehicles to only those roads that are essential to access these areas. Close and reclaim any roads that are in excess of a basic transportation network.
S-0003-07	Please try to keep industrial activity such as power lines gas and oil wells and pipelines concentrated on the edges of BLM lands, adjacent to existing roads. Leave wide open spaces for non-motorized recreation far from industrial development.
S-0003-08	I really like the Arrow Creek Breaks. Like the Terry Badlands in eastern Montana it is easy to get a feeling for how wild Montana once was just by hiking away from the road a short distance here. The ruggedly beautiful Arrow Creek Breaks are fragile and easily scarred. Please protect them from the abuses of motor vehicles.
S-0007-02	Having canoed the Missouri River numerous times since 1979, I am concerned about cottonwood regeneration, invasion of noxious weeds, loss of solitude and quiet, destruction of riparian habitat by motorized travel, (air, land and water) and livestock use.
S-0009-01 (DUPLICATE)	Loss of hunting and other access to private farm and ranchland in Montana, as across the West, is becoming a critical problem. Wildlife habitat on private lands is being lost to an agricultural industry responding to booming new global markets. Energy development has demanded, and will continue to demand, tradeoffs from wildlife and public lands recreation. All of these factors increase the importance of the Lewistown RMP to every stakeholder in these public lands.
S-0034-01	Adequate recreational opportunity for all visitors is the supreme issue that must be addressed by this action. The relative importance of recreation on a national basis is demonstrated by the Bureau of Economic Analysis statistics for spending on recreation. In 1979 the index for recreation spending was 32.537 (year 2000 = 100, http://www.bea.gov/national/nipaweb/TablePrint.asp?FirstYear=1979&LastYear=2004&Freq=Year&SelectedTable=33&ViewSeries=NO&Java=no&MaxValue=155.606&MaxChars=7&Request3Place=N&3Place=N&FromView=YES&Legal=Y&Land=). In 2004, the index was 113.695 for an increase of 349%. No other sector has increased this dramatically. Clearly, the public wants and needs adequate recreational opportunity and this should be the over-arching theme of this evaluation and decision.
S-0034-02	We feel strongly that there can be “no net loss” of motorized recreational opportunities with the Lewistown Resource Management Plan DEIS project.
S-0034-03	The agency can no longer ignore that motorized access and recreation are the largest (over 50 million) and fastest growing group of visitors and at the same time other outdoor activities have declined 18 to 25% (Journal of Environmental Management 80 (2006) 387–393, http://www.redrockinstitute.org/uploads/PNAS.pdf and

	http://www.msnbc.msn.com/id/22998037/).
S-0034-04	The agency can no longer ignore the significant cumulative effect that all of the motorized closures over the past 30 years have had on motorized recreationists.
S-0034-05	There is nothing radically wrong with the existing condition except that it does not meet all of the needs of motorized recreationists, does not provide equal opportunity, and does not adequately address the growing needs of motorized recreationists.
S-0034-06	We request that the BLM provide an adequate and fair evaluation of: 1. The needs of motorized recreationists and the cumulative impacts of motorized closures, 2. All existing routes including those meeting National OHV guidelines and currently closed routes, 3. The current imbalance of non-motorized to motorized trails, and 4. At least one pro-recreation alternative in the analysis. 5. Under the existing condition, too much of the Lewistown Field District area is set-aside for segregated exclusive non-motorized use for 1% of the visitors to the area. We do not agree with all of the effort that the agency is going through to segregate users. Multiple-use lands are public places. Segregation in public places has not been acceptable since the Civil Rights Act of 1964 (http://www.ourdocuments.gov/doc.php?flash=true&doc=97%page=transcript). In order to reasonably meet the requirements of integration a reasonable management goal for 99% of the BLM land would be for shared multiple-use that would produce a 50/50 sharing and equal opportunity of non-motorized/motorized trail opportunities. 6. The quality of the human environment deserves significant consideration in the analysis and decision.
S-0034-07	The Lewistown Resource Management Plan DEIS must include adequate evaluation of cumulative effects so that motorized recreation will not be removed from our public lands. An adequate evaluation of cumulative effects would include all past, current, and reasonably foreseeable actions that have or will produce motorized closures in the State. The environmental analysis must adequately address the human environmental including issues, needs, alternatives, and impacts on the public associated with the reduction or lack of adequate motorized recreation. An adequate analysis would include evaluation of significant social, cultural, historical use, current use, future needs, economic impact, and quality of the human environment issues from the perspective of motorized recreationists.
S-0034-08	A reasonable alternative should address: a. Sharing non-motorized trails with mountain bikes and motorcycles, b. Creating new mountain bike and motorcycle trails, c. Creating ATV trails from roadbeds that both currently open and closed, d. Creating new ATV trails e. Creating new ATV trails that connect with converted roadbeds to create loops, and, f. Establishment of 4x4 challenge routes using roadbeds that are both currently open and closed including historic mining routes.
S-0034-09	A program similar to the following would help the agency better understand the needs of motorized single-track trail riders which have been ignored in the analysis.
S-0034-10	Public understanding of the proposed alternatives would be greatly improved by implementing a mapping tool similar to the one developed by Idaho Parks and Recreation. This tool can be tried out at http://www.trails.idaho.gov/trails/ . Zoom in and click on a particular trail to see the information provided for each route. Earlier versions of this tool included GPS downloads for each route which would help assure that the public was on the right trail. This tool would also be useful after the analysis and decision to inform the public of the route designations.
S-0034-11	There are no significant motorized single-track trails in the proposed action. This is a significant need and the significant issue associated with not addressing this need has not been adequately addressed.
S-0034-12	The needs of the aging baby boomer population and their desire for adequate motorized access and motorized recreation is a significant issue that is brought up continually at our monthly meetings and in many discussions with other motorized recreationists. This significant issue must be recognized and given a hard look in the Purpose and Need, adequately addressed as part of the human environment and adequately addressed by the development of a reasonable Pro-Recreation alternative. We request that the Purpose and Need for this action be written to address the significant need for motorized access and motorized recreation in the project area including adequate recognition of the positive impact on the quality of the human environment. The BLM can help address this significant problem by providing an adequate quantity and quality of motorized recreational opportunities. We ask that you adequately address this significant issue associated with the human environment.

S-0034-14	First, the needs of the human environment for motorized recreation should be considered part of the natural environment (as required by the original NEPA) and adequately considered in the evaluation. Secondly, massive impacts from natural events such as fires, floods, and pine beetle (we have witnessed all of them recently) are considered acceptable while relatively miniscule impacts from motorized recreation are considered unacceptable.
S-0034-15	Single-track reaches should be designated for motorcycle and mountain bike use, 48" width areas should be designated for ATV use, and reaches wider than 48" should be designated for UTV and 4x4 use. Open riding areas should be designated for trials bikes which have different riding area requirements than trail riding. Motorized trails systems should provide for all levels of skill so that the needs of all levels of motorized users and all types of motorized vehicles are adequately addressed. The motorized route designation process should also adequately consider the mileage of trails required for weekend camping trips, adequate destinations, and other factors. We ask that motorized recreationists be adequately queried as part of the process and that the site-specific conditions that they identify be considered as required by the Final Management Strategy.
S-0034-16	We request that this evaluation carefully consider the intent of the Final OHV Management Strategy and use it to designate existing motorized routes and create new motorized routes.
S-0034-17	There is a significant need for Youth Loops. Youth Loops would include a small area of several acres, either contained by fencing or clearly marked boundary, with short, tight trail system that is designed to entertain kids under adult supervision. The youth loop offers an alternative to unauthorized routes near camp areas and riding in campgrounds.
S-0034-18	The BLM must give a hard look at the impact of motorized closures on the human environment. The cumulative effect of all motorized closures has been significant and is growing greater every day yet they have not been adequately addressed.
S-0034-19	We request that the agency not use the existing motorized trail inventory for designating non-motorized trails. Instead, if there is a need for non-motorized trails, then the agency should consider options that do not reduce the existing opportunity for motorized users.
S-0034-20	The project team must formulate at least one alternative that emphasizes OHV use in Roaded Natural and Semi-Primitive Motorized opportunity settings for recreation.
S-0034-21	Alternatives should include areas where OHV trails can be constructed and maintained when demand increases.
S-0034-22	Where cattle grazing has established a network of cow trails, a reasonable alternative would be to allow motorcycle use on these single-track trails as there would be no change in impact or visible use of the trails.
S-0034-23	The action must develop a preferred alternative that mitigates the significant impacts on the public from the loss of motorized access and motorized recreational opportunities from the proposed action and the combined cumulative effect of all other actions in the state.
S-0034-24	The existing level of motorized access and recreation is reasonable alternative and an alternative other than No Action must be built around it. This reasonable alternative should also include mitigation to protect the natural environment and compensate motorized recreationists for the significant cumulative effect of past losses, and enhancement to adequately address the growing need for motorized access and recreation.
S-0034-25	The scope of the project must address both existing routes and new construction.
S-0034-26	A reasonable goal for the allocation of trails should be 50/50 sharing and equal opportunity of motorized/non-motorized trails.
S-0034-27	A reasonable alternative that must be adequately addressed is the existing level of motorized recreational opportunities plus mitigation projects to protect the environment from existing problem areas, mitigation for past motorized closure cumulative effects, and enhancement for growth.
S-0034-28	Dispersed campsites are very desirable camp sites. Closure of these sorts of dispersed campsites would have a very significant impact on the public and we request that they remain open.
S-0034-30	The planning team should formulate an Alternative that maximizes all existing recreational opportunities, as well as anticipates and plans for an increase in recreational use in the future.

S-0034-31	<p>Suggestions:</p> <ul style="list-style-type: none"> a) The public wants the existing roads and trails left open to vehicle use. b) The existing network of roads and trails in the planning area should be considered an inventory with which to develop recreational trail systems. c) The Planning Team should look for management alternatives that provide for mitigation instead of closure. Options other than closure should be emphasized in each alternative. d) Alternatives, or management guidance, directives etc that require closure as the first or only option when resource impacts are identified should be avoided. e) The Planning Team should carefully consider displaced use. Assuming that closures are eminent in some areas, one could calculate approximately how much existing motorized will be displaced to other areas. The Planning Team should develop alternatives that allow for additional access and additional recreational opportunities in suitable areas in order to properly manage the displaced use. f) The Planning Team should avoid overly restrictive management prescriptions that limit the land manager's ability to respond to changing recreational patterns.
S-0034-32	<p>A reasonable test of significance of impacts from motorized closures on motorized recreationists must be used. A reasonable test would include evaluation of indicators including:</p> <ol style="list-style-type: none"> 1. Where else can motorized recreationists go within a reasonable distance and with equal recreation value? 2. Do motorized recreationists have an adequate selection of the recreational resources with the proposed motorized closure(s)? 3. What is the balance of recreational opportunities in the area and region as demonstrated by the information developed from the outline shown in Table 3? 4. Are the existing motorized recreational opportunities sufficient for the needs of the public? 5. Are there documented user conflict and can the recreational resources be reasonably shared? Note that it is not reasonable to define user conflict a merely seeing someone else on a trail. 6. What are the cumulative effects of this motorized closure combined with all other motorized closures?
S-0034-33	<p>Mountain bikes and motorcycle use should be considered compatible uses. Both are mechanized and both prefer a single-track or narrow trail.</p>
S-0034-34	<p>If the loss of motorized routes cannot be mitigated within the project area, then a Motorized Access and Recreation Mitigation Bank must be established. This mitigation bank would keep an overall accounting of the miles and acres of motorized access and recreational opportunities closed and the new motorized access and recreational opportunities created to offset that loss.</p>
S-0034-35	<p>The evaluation needs to distinguish the difference in trail requirements and impacts between atvs and motorcycles and use that difference to justify keeping more single track trails open to motorcycles.</p>
S-0034-36	<p>A fair travel management process would start with a comprehensive inventory of all existing motorized routes in use by the public.</p>
S-0034-37	<p>Oftentimes, many of the motorized roads and trails proposed for closure are primitive roads and trails that provide the ideal experience sought by motorized visitors. We request that the analysis adequately evaluate the type and quality of experiences that motorized visitors enjoy and want maintained in the area.</p>
S-0034-38	<p>The amount of sediment production from federal lands is relatively small compared to sediment production that ultimately reaches stream courses from non-federal lands.</p>
S-0034-39	<p>If a private property owner closes a historic motorized access or route to public land through their property, then in order to be fair, to avoid special privileges; the public routes should be closed at the private property line to all motorized use and, where the route has access from the other end on public land, it should remain open so that it can provide an out and back motorized opportunity.</p>
S-0034-40	<p>Anytime there is a land exchange between private and public entities, a public access easement or right-of-way should be required in order to offset the trend of less public access to public land over the past 35 ± years and the cumulative negative impact of that trend on multiple-use recreationists.</p>

S-0034-41	Many handicapped, elderly, or physically impaired citizens can only access and recreate on public lands by using motorized roads and trails. The needs of these citizens should be adequately considered.
S-0034-42	Closed unless posted open is an impractical concept because signs do not last very long for many reasons including vandalism, animals and weather knocking them down, rotting of posts, etc.
S-0034-43	We request evaluation of the loss of opportunities for off-highway vehicles due to the lack of a continuous system of roads and trails on which off-highway vehicles can be legally ridden and the formulation of a preferred alternative to address that issue. In areas where OHVs must use a roadway, we request that a reasonable travel management alternative be developed that includes the designation of a reasonable network of dual-use roads to allow inter-connection access to OHV recreational resources.
S-0034-44	We are concerned about the preservation of historic mines, cabins, settlements, railroads, access routes and other features used by pioneers, homesteaders, loggers, settlers, and miners. These are important cultural resources and should not be removed from the landscape. We request that the ties to the land that are part of our local western culture and heritage be protected and that the preferred travel management alternative include opportunities to visit these features as part of motorized interpretative spur destinations and loops.
S-0034-45	Most problems associated with visitors can be addressed by education. Education should be the first line of action and all education measures should be exhausted before pursuing other actions.
S-0034-46	In addition to the education initiative discussed above, we also request that the agency undertake a special management initiative that would evaluate areas where the public is not following the designated system of routes.
S-0034-47	We request that the analysis and decision-making avoid restricting motorized access and recreation opportunities to narrow corridors along major roads.
S-0034-48	Existing timber sale roads and trails should be inter-connected by construction of new trail segments or rehabilitation of existing trail segments to provide mitigation for lost motorized recreation opportunities. Connector trails should be constructed to avoid dead-end trails.
S-0034-49	Where possible, agencies are encouraged to provide trailheads for motorized trails that are convenient to urban areas.
S-0034-50	Every public access closure through private land should be challenged and protected by asserting legal right-of-ways.
S-0034-51	Provide open or play areas for motorized recreation opportunity and trials bikes where acceptable in selected areas.
S-0034-52	Motorcycle trail riders enjoy riding single-track trails. Motorized single-track recreation trails are limited at this time and continue to decline. Some BLM and FS districts do not differentiate between ATV and motorcycle trails in their travel plans. Evaluations and travel plans should differentiate between ATV and motorcycle trails.
S-0034-53	The integrity of the "loop" trail system should be maintained. Loop systems minimize the number of on-trail encounters because non-motorized trail users don't encounter motorized users going both directions, as they do on non-loop trails. Loop trails also offer trail users a more desirable recreational experience. Agencies are encouraged to provide opportunity for "motorized loop trail systems" to lessen impacts and to provide a better recreational experience. Spurs are useful for exploration and reaching destinations.
S-0034-54	Agencies are encouraged to avoid yearlong trail closures if wildlife concerns are valid only during certain seasons. In these instances, closures should be seasonal only with the dates consistent with the requirements to protect wildlife.
S-0034-55	Agencies are encouraged to avoid trail closures associated with other actions including timber sales, mining, and livestock grazing. Corrective action should be taken where trail closures in the past have resulted from these sorts of past actions. Loss of motorized trails because of past timber sales should be mitigated by connecting old and new travelways to create looped trail systems.
S-0034-56	There needs to be better coordination between adjoining National Forest and BLM lands when making maps, laying out trails, and establishing travel plans. In some cases a trail is open in one jurisdiction but becomes closed when it crosses over the boundary to another jurisdiction resulting in an overall loss of motorized recreation opportunity.

S-0034-57	Agencies should not use motorized access in areas closed to motorized access by the public because: (a) the public will see the tracks and could become upset that the motorized closure is being violated and/or (b) the public will see the tracks and conclude that motorized access is acceptable.
S-0043-07	<p>Travel Management and Recreation</p> <p>2) Use Recreational Opportunity Spectrum. We request the RMP utilize the ROS system to address balance of recreational opportunities. We request allocations which assure primitive and semi-primitive classes are well represented across the area.</p> <p>Access to and equal use of landlocked parcels</p> <p>1) Acquisition of Access to landlocked parcels. Acquiring public access to the boundaries of large BLM holdings where no such access currently exists must become the top travel priority for BLM management.</p> <p>2) Proceed with no land exchange transactions that will negatively impact future public access to hunting and fishing opportunities in the area of the proposed exchange. Coordinate with FWP in evaluating wildlife management outcomes of completed exchanges.</p> <p>3) Identify parcels without legal public access and direct efforts to improve legal public access.</p> <p>4) Prohibit hunting outfitting on BLM lands where the general public does not have legal access.</p>
S-0043-10 (DUPLICATE)	<p>Identify and manage Backcountry Conservation Areas</p> <p>We ask that you identify areas of lands that are generally intact and undeveloped and that provide high quality fish and wildlife habitat. We ask that you allocate or designate these lands as “backcountry conservation areas” (BCAs) to conserve unfragmented fish and wildlife habitat and dispersed hunting and fishing opportunities. BHA is working with other hunting and fishing based organizations to identify specific intact and undeveloped lands within the BLM Lewistown District that are appropriate for BCA management, and we will follow up with supplemental recommendations that nominate specific areas as backcountry conservation areas. The following provides specific examples of the appropriate allocations or management approaches that should be applied in the Lewistown RMP when adopting BCAs.</p> <p>BCA Resource Decisions</p> <p>Recreation Opportunity Spectrum (ROS) The following ROS classes would be available within BCAs:</p> <ul style="list-style-type: none"> • Primitive; • Semi-Primitive Nonmotorized; • Semi-Primitive Motorized <p>Off-Highway Vehicles Designated as limited or closed. Existing routes would generally be retained, but travel would be limited to existing roads, primitive roads and trails.</p>
S-0046-02	<p>A second note that is of importance to me is that the Caverns always be associated with the New Year Mine. If this is going to be a tourist attraction, we must use every means possible to lure tourists or visitors to the location. Most visitors will want to see the Caverns. The mine tunnel, if available to them, would be of secondary importance. But there are mining buffs, Old West history buffs (of which I am one) and others to whom mining is a very important endeavor and the association with New Year Mine would increase interest in seeing this feature. The adit or entry tunnel could feature, at its far end, a mining diorama which would include the old mining cart still in there. The tracks would be kept in place and the area well lighted. The diorama or dioramas could tell the story of New Year Mine and of Crystal Caverns.</p>
S-0046-03	<p>A third recommendation would be to consider New Year Mine-Crystal Caverns as part of an even larger tourist attraction. It would be possible to construct a lift of some sort, possibly a gondola lift, to the top of New Year Mountain. Tourists could board the lift near the Mine-Caverns entrance and ride up to a small chalet-like or gazebo-like structure from which they could view the surrounding countryside. Historical displays could be there also. From there one should be able to see Lewistown and all the beautiful country surrounding it. If BLM decides to use the New Year Gulch Road to access the mine and caverns, such a lift could begin at the bottom next to the road and, thus, tourists would not need to drive up the winding road to the mine-caverns entrance. Parking could be provided below at roadside.</p>

S-0046-04	As I understand it, it appears access to the mine-caverns area might best come from the Lime Kiln Road. Parking possibly could be at the Duvall Inn area and then people could walk or take people-movers to the mine-caverns entrance. If BLM wished, the old logging road that begins behind Duvall Inn could be improved and extended to the mine-caverns entrance in such a way that tourists could drive their cars up to a parking lot near the entrance. I recently learned that this old logging road was used for logging 20 acres of wind-downed trees in the area so apparently the road is usable. This project occurred fairly recently, I am told. This access road has, as I understand it, the feature of not crossing as much private land as the northern route, and it would be more scenic. Because the new shooting complex is located on the Lime Kiln Road closer to Lewistown, there would be added reason for Fergus County to pave the road from Highway 191 at least as far as the Lime Kiln Canyon entrance. I am told by shooting complex officials that they would like that road paved and I am sure residents on the road would like that also.
S-0046-05	BLM has made clear that public use of Crystal Caverns and New Year Mine will be by guided tour only. This is as it should be to protect the resources inside the Caverns especially. BLM would have to construct a "catwalk" possibly with railings to keep people on one path and keep them away from sensitive features. This kind of walkway is needed because the floor of Crystal Caverns is very muddy. BLM might also require that everyone entering wear a hardhat and protective coverings of their shoes. These items could be provided at the entrance.
S-0046-06	Some sort of electrical lighting system would have to be used and I understand that BLM has considered both electricity by wire or using a generator. I should note that when the caverns were open to the public in the 1920s and 30s, there was an electrical lighting system in use. There also were signs designating certain features some of which, I understand, remain. As much as can be kept for public viewing of that earlier era should be retained. There are many people still living in Lewistown who remember going into the caverns as children. I have interviewed many old-timers who went in. The caverns was a tourist attraction for more than 20 years.
S-0046-07	Amazingly, bats have never used the caverns which helps BLM in planning public use of the feature. Since Crystal Caverns is a living caverns in which the geologic features such as stalagmites and stalactites are still growing and being created, the caverns could be a living caverns research facility to determine if there is any harmful impact from public use. If notable harm was occurring, of course, the caverns could be closed.
S-0046-09	The Judith range is home to a rare fish, it was once home to an Air Force radar station, also a bible school, an historic Girl Scout camp and several major mines like the Gilt Edge, Spotted Horse and Maginnis mines. The Maginnis is owned by a Maiden resident who continues to work it. Hundreds of thousands of dollars of gold and silver came out of those three mines and many others. The New Year Mine was operated for some time but was not a big producer. There also are tales that Spanish gold is hidden in the Judiths awaiting the finder. Of all the island mountain chains in the Lewistown area, the Judiths have the richest history. All of this could be told in dioramas in the adit or elsewhere.
S-0046-10	I attended the Lewistown scoping session where you told me I should send you my comments via e-mail, which I am doing. Let me conclude by saying I strongly support development of the Crystal Caves-New Year complex as a tourist attraction. I believe most residents of Central Montana support this development. I believe such a development would have a great economic impact on Lewistown and the surrounding area. I believe as many or more visitors would come to Crystal Caverns as now go to Lewis and Clark Cavern. And finally, I understand that you are including development of Crystal Caverns in your new management plan. I hope that is the case and that you carry on with your studies and preparations so the Caverns-Mine complex can become a major Montana tourist attraction.
S-0048-02	My Secondary Concerns: (Wilderness Characteristics and Livestock Grazing) - I note that the Bureau of Land Management lands adjoining and within the immediate vicinity of my private land have been identified by the agency as having potential wildlife characteristics. Indeed, the area has exceptional wildlife. The burgeoning numbers of elk, mule deer, sharp-tailed grouse and turkeys - just to name a few species- are ample evidence of this. However, regardless of the abundance of wildlife in this area, any Resource Management Plan must also provide for other long-standing and beneficial multiple uses in this portion of Northeast Fergus County- primarily livestock grazing, hunting and recreational access.

S-0050-01	<p>I was in the the New Year mine cave (the Crystal Cave) last summer. It is spectacular and should eventually be opened to the public. Fortunately, there are no protected bats or other wildlife residing in the mine workings or cave so we humans should be allowed to enjoy it. I understand it would likely require extending a hiking trail from the existing Lime Kiln trail system for visitor access by foot. A qualified guide would likely be required to escort visitors into the underground workings and cave; both for safety and security purposes. Rules and guidelines would have to be developed. Possibly qualified volunteers could serve as guides. Tours could be set on a schedule - say once per month in the summer and possibly also by appointment. Vehicular (ATV, four-wheeler) access beyond the end of the existing public road should be obtained from New Year Gulch property owners. This could be a stipulate and restricted access allowing the "guide and other authorized personnel" the option and ease of vehicular access rather than having to hiking in; provide emergency access; and a means for getting supplies, tools, and such to the adit site. As an experienced underground miner, and familiar with other caves in the Judith's, I could be willing to help out with this project.</p>
S-0050-02	<p>Collar Gulch should be opened back up for vehicular public access by opening the gate. The difficult decent and poor road in itself will limit the type and amount of traffic. It seems that the fish have been well protected and after 20 years of the access being closed it should once again be available to members of the public who are not capable of hiking in by way of the Camp Maiden road or the Collar Gulch Trail system. The gulch was a favorite place for many people for many years. The old Collar Mill stone foundation and dam farther up the creek are significant historical sites. And, it's always thrilling to view the fish. Thought should also be given to possibly lifting or reducing the size of the Collar Gulch ACEC designation. Is it still necessary?</p> <p>The BLM should survey and mark the boundary between public lands and private property in Collar Gulch. A sizable portion of Collar Creek is within the boundary's of the Hendricks and Edwards patented mining claims. The BLM should inquire with the property owners to determine if they would be interested a land swap or sale. As one of those owners, I would consider it.</p>
S-0051-05	<p>Recreation and Visitor Services</p> <ul style="list-style-type: none"> • Agree with both the Planning Questions and Planning Considerations at this time.
S-0052-02	<p>Prior to designating SRMAs and ERMAs that contain adjoining private land, the private landowner should be consulted. An agreement should be developed that describes the roles and responsibilities for management of the area - these should include responsibility for trash cleanup, the spread of noxious weeds, the degradation of vegetation, and the maintenance of roadways because of the area being used for recreation. As co-owner of the Vogel Dam, the Brady Ranch is concerned about the problems created by the reservoir being a public recreation site. The Ranch was not consulted prior to the area becoming a designated recreation area and has not been consulted about the stocking of fish that has been taking place. Specific problems resulting from high public visitation are driving on the spillway and dam fill - which, according to the BLM engineer, will eventually result in the failure of these structures - blocking access across the dam to the private property, vandalism and ignoring of signage placed by the property owners, driving off roadways, leaving trash, spreading weeds, fire danger, etc. These problems are as detrimental to the BLM managed property as the private property. These issues need to be addressed or the fish stocking of the Vogel Reservoir will end.</p>
S-0052-03	<p>As a private property owner and a BLM grazing permittee, the use of 2-track trails and any semblance of a trail by OHV users is concerning. Many OHV users drive on anything that resembles a trail and the result is damage to vegetation and it also leads to trespass onto private property.</p>

S-0055-01	<p>In developing your new Resource Management Plan I ask you to give strong consideration to protecting areas with wilderness characteristics. Wild areas provide the best wildlife habitat, clean water, and, in my opinion, by far the best opportunity for recreation such as hiking and hunting away from the crowds.</p> <p>Please conduct wilderness inventories on all lands which may qualify for protection and on areas which contain critical wildlife habitat, historical values, and opportunities for quiet, non-motorized recreation. This should include areas that have the potential for restoration from past damage, current noxious weed infestations, or areas with illegal or damaging off road vehicle use. Prevention of further degradation and restricting further damage now, while the planning process is ongoing, is necessary.</p> <p>Given the vast expanse of the Lewistown management area, I strongly encourage you to take advantage of wild land inventories done by non-governmental groups, such as the Montana Wilderness Association.</p>
S-0055-02	<p>I realize that development for industrial use is a legitimate use of our public land. With the vast amount of land already developed, I'd like to see future development limited to areas that do not abut critical wildlife habitat and do not affect the potential for primitive, non-motorized recreation.</p>
S-0056-01	<p>BLM should place a high priority on consistency when evaluating human activities' impact on the landscape when assessing existing uses and developing new management directives. For example, when evaluating the safety concerns associated with various forms of outdoor recreation (mountain biking, recreational shooting, hiking, horseback riding), it is critical that BLM use comparable metrics such as accident statistics to identify legitimate safety issues and convey them to the public via the formal planning process. Additionally, BLM should take great care to evaluate and utilize economic and participation data throughout the planning process. According to the U.S. Fish and Wildlife Service's 2011 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation, 267,000 anglers spent 2,450,000 days fishing in Montana and spent \$339,383,000 doing so. Additionally, 150,000 hunters spent 2,493,000 days hunting and spent \$627,298,000 on trip-related expenditures, equipment and other items associated with hunting in that year alone.</p> <p>In 2011, 7.2 million people nationwide shot recreationally, with only 2.9 million visiting shooting ranges. Many of these remaining 4.1 million recreational shooters depend on access to informal shooting on federal land in order to continue recreating as they have for many decades.</p> <p>When considering management proposals or activities that would impede access to hunting, fishing or recreational shooting throughout the planning process, BLM should take these figures and others into consideration. Additionally, BLM should note and discuss the impact that impeding recreational access would have on local economies, the ability to collect state and local taxes and revenues collected through the Wildlife and Sportfish Restoration programs which collect taxes on the manufacture of firearms, ammunition, fishing tackle and other outdoor equipment taxed to support conservation.</p>
S-0056-02	<p>Any inventory of federal lands and associated resources available to the public should be inclusive in order to provide stakeholders with a legitimate opportunity to participate in planning processes. With respect to outdoor recreation resources, BLM should utilize the planning process to evaluate prevalent uses of public land on equal footing, using similar metrics whenever possible.</p> <p>Additionally, when assigning values to public land resources, BLM should use existing knowledge of the Field Office to consider factors including, but not limited to: geographic distribution of recreational activities, current number of participants engaging in recreational activities, historical use of public lands for recreational activities, and the public's ability to engage in recreational activities if existing opportunities to do so on public land are limited.</p>
S-0056-03	<p>As previously stated, BLM should include a robust discussion of all recreational activities taking place on public land when evaluating the existing management situation throughout the scoping process. With respect to hunting, angling, recreational shooting, any discussion of existing use should include participation data relevant to the Field Office in question and acknowledge the wide variety of benefits associated with these activities.</p>

	<p>Additionally, BLM should utilize planning resources to develop alternatives which would expand recreational access of all types. Using the planning process to consider the enhancement of developed recreation opportunities for some, but not all activities for which this is viable has the potential to marginalize stakeholders and limits their ability to effectively participate in the planning process.</p>
S-0056-04	<p>Many of those who hunt, fish and shoot recreationally in the western United States are highly dependent on federal lands which provide access to these activities. One study, conducted under a Multi-State Conservation Grant issued by the U.S. Fish and Wildlife Service, found that in one western state, 92% of hunters had hunted on public land in the ten years preceding the study. The same study also found that hunters cited “not enough access” and “not enough places to hunt” as the top barriers limiting their participation in the sport.</p> <p>Any planning proposal or action that limits existing hunting, angling or recreational shooting access should not be offered without prior analysis and formal discussion of its impact on the public’s opportunity to participate in these activities as a result of these limitations. Additionally, supporting analysis should be detailed and include discussion of access, proximity of closures to concentrations of existing participants and potential alternatives for those impacted by planning actions which limit existing access.</p> <p>Planning activities which limit recreational shooting should not be evaluated or proposed based on the number of acres which will remain open to shooting under a proposed planning alternative. Justifying shooting closures by simply stating that a certain percentage of acres managed by a Field Office will remain open to dispersed shooting does not appropriately describe the impacts of a proposed planning alternative because it includes no discussion of reasonable access, proximity to concentrations of shooters or viable alternatives available to displaced participants.</p>
S-0056-05	<p>As organizations with a vested interest in continuing the longstanding partnership between federal land agencies and the sportsmen’s community, we encourage the Lewistown Field Office to revise its Resource Management Plan consistent with the spirit of the Federal Lands Hunting, Fishing and Shooting Sports Roundtable Memorandum of Understanding (MOU). By signing this document, BLM has agreed to work with private organizations to facilitate appropriate collaborative opportunities to improve access and target ranges on public lands. Additionally, BLM has also agreed to assist in addressing issues regarding hunting, fishing and shooting sports activities on federal lands, such as those managed by the Lewistown Field Office. Consistent with the spirit of the MOU, we stand ready to assist the Field Office in proactively addressing concerns that may arise during the scoping process in order to maintain access for hunting, fishing and recreational shooting and aid in the development of reasonable planning alternatives which are mutually agreeable to BLM, the sportsmen’s community and the public.</p>
S-0059-13	<p>Recreational opportunities provided by wilderness quality lands lead directly to economic benefits to surrounding local communities . . . Because of the nature of the communities residing in the Lewistown planning area, we advise the BLM to examine the report by the Sonoran Institute “Prosperity in the 21st Century West – The Role of Protected Lands.” This report found that: Protected lands have the greatest influence on economic growth in rural isolated counties that lack easy access to larger markets. From 1970 to 2000, real per capita income in isolated rural counties with protected land grew more than 60 percent faster than isolated counties without any protected land. This clearly shows that wilderness quality lands and their due protection are economically vital for local economies.</p>

S-0059-14	<p>Our current understanding is that travel management will be completed within 5 years of the RMP. However, open, closed, and limited ORV zones still exist. We feel that all routes within potential lands with wilderness characteristics should be considered closed until travel management can be completed. Where this is not possible, limit vehicles to existing routes only.</p> <p>As a part of protecting these landscapes, it is important to protect them so that we can keep enjoying them and not just block them off. Therefore, we encourage the BLM to identify and prioritize access to these units and improve access to potential LWCs that are currently limited or unable to access. When there are multiple roads/routes leading to the same destination, the BLM should identify which roads/routes can be closed or limited while allowing access.</p> <p>We ask that that BLM also consider the recreational opportunity spectrum within the planning area and identify areas for semi-primitive, non-motorized recreation and prioritize their protection. Please see Appendix H of the BLM Alaska Ring of Fire Proposed RMP/Final EIS.</p> <p>Even though the plan is not addressing travel management, the BLM has the authority to close problem routes. Since it could be many year before a travel management plan is completed and implemented, we ask that where problem routes are identified through the planning process, that you exercise your authority to management vehicle use, on an interim basis, until a travel management plan adopted to prevent further damage.</p>
S-0059-15	<p>We recommend the following:</p> <ul style="list-style-type: none"> · View the travel planning criteria in the ROD of the Dillon (MT) RMP at http://www.blm.gov/mt/st/en/fo/dillon_field_office/rmp.html as an example of an alternative to completing travel management outside of the initial RMP effort. They include road density targets and an appendix outlining the principles they will use when completing a comprehensive travel management plan. · Travel planning should address the recreation and transportation needs of the planning area. · Use the legal definitions of routes and roads when designating routes. · Present baseline travel system responsibly, so that that illegally-created routes are not legitimized. · Please include a detailed closure and restoration schedule in the plan. · Please address the monitoring of road closures and restoration. We sincerely commend the BLM on their current efforts to do this. To our knowledge, the Lewistown field office has the most and best appropriate signage for road closures in the state of Montana.
S-0059-18	<p>Master Lease Plans are a new and effective method of resolving conflict in areas of competing interests and uses. This field office has many areas that have competing and conflicting interests and an MLP could adequately address them. The current resources we see that are in conflict include: greater sage-grouse, lands with wilderness characteristics, hunting and fishing, and oil and gas development. Not all of those interests are in direct conflict with each other. However, based on fluid minerals, wildlife data, and potential lands with wilderness characteristics, we would like to nominate the following regions:</p> <ul style="list-style-type: none"> · Southeast in the planning unit. This is the area south of Highway 200 and east of Highway 87. This includes the Elk Creek PLWC, Pike Creek PLWC, Cemetary Road PLWC, Cat Creek PLWC, and Cottonwood Creek PLWC units. This area has high conflict between recreational opportunities and oil and gas development. · Northcentral in the planning unit. This is the area north of Winifred including Chimney Bend PLWC, Woodhawk Creek PLWC, Dry Armells PLWC, and Armell's Creek PLWC. This region has high conflict between wildlife and habitat and oil and gas, and oil and gas development and recreational opportunities. · Western portion of the unit along the Rocky Mountain Front. This area includes Blind Horse Creek PLWC, Ear Mountain PLWC, Chute Mountain PLWC, Deep/Battle Creek PLWC, Beaver Meadows PLWC and the North Fork of the Sun River WSA. This has high conflict between oil and gas development and wildlife habitat, and oil and gas development and recreational opportunities.

S-0062-03	Regarding land tenure adjustments, I have no issue with using the scattered, isolated parcels that are difficult to manage being used for exchanges or sales. I wonder, however, in controversial places such as Durfee Hills, if you would consider retaining a recreation easement if you feel the values warrant continued public access.
S-0064-01	<p>MMBA wishes for this BLM planning effort to identify areas near small towns that hold future potential for non-motorized recreational trails. These areas ideally should be within 20 miles or less to communities with schools, homes, stores, or other facilities. We have identified two areas. Near Lewistown, on BLM lands in the Judith Mountains, exists the Limekiln Trail. But the town could use and enjoy more miles of trail. Trails that reach out northward along this island range, and trails that form loops that reduce driving requirements should be a future goal. Eventually every trail built will be a valued community resource. Lewistown is a large enough town to need several more trails, each providing a different experience.</p> <p>Near Winnett, on BLM lands from Cat Creek north to Blood Creek, a singletrack trail could become a legacy and valued resource for area residents. From a trailhead near Cat Creek, singletrack trail could wind along through the hills and coulees above the Musselshell River. Not all of the BLM land is contiguous, but the Lower River Road ties everything together. Ideally a trail in this area could be used not only for bicycling, but for horse riding, cross-country running, and hiking as well. A trail could be formed by planning and building several loops, eventually tying them together by easements. It remains to be seen if the people of Winnett would accept this concept, but the first step would be to identify this location as a potential recreational resource. Certainly if a trail was eventually constructed and enjoyed, Winnett would collect benefits that accompany recreational trails, including better health, recreational choice, and a new source of economic diversity. Ideally every small community should have trails for residents to enjoy. While it's not the duty for the BLM to provide for all small Montana towns, we think these are two important recreational locations in the Lewistown planning area that must be identified in the RMP.</p>
S-0066-01	The first issue to be addressed is Public Safety! This has to do with a piece of BLM land that dissects deeded lands, a county road splits this north and south. We have been here almost 30 years, with little or no problems. In the past 5 years however, problems have escalated into nightmares - loss of livestock due to gunshot (documented by the Montana Dept. of Livestock, constant trespass of deeded lands, hunter/hunter conflicts, wildlife & livestock harassment, hunter/landowner conflicts and miles of extra fence repair. Our ranch headquarters are within ½ mile of this conflict area causing concern for our own safety! Also the garbage is of concern. There are also law enforcement/landowner confrontation which was documented and vindicated.
S-0066-03	3rd issue, fairness in land use - we as grazing leases have to pay a fee plus take care of the land, up keep the fences and provide water on these allotment, while recreationers pay no fees and for the most part do not take care of the land!
S-0068-01	"Issues for this parcel: ORV use, erosion of former logging roads, noxious weeds, conflicts with bears and subdivision development to the south (Elk Meadows)" Comment noted on map of the planning area at a public scoping meeting; BLM parcel close or adjacent to Highway 200 approximately 6 miles south of Dearborn River.
S-0071-01	I am writing to request that any revisions to the travel plan include as much acreage and access for OHVs as possible. Public lands are just that - public - and they should be maintained for the use and enjoyment of EVERYONE, not just the people who oppose resource development, OHVs, horses, bicycles, cows and ever other conceivable use except walking in tennis shoes. "Saving public" land doesn't mean eliminating all other types of uses on the land otherwise there is nothing we are saving the lands for. Keep access open for all users on PUBLIC lands.
S-0072-21	The 2012 Montana Fish, Wildlife, and Parks ("MTFWP") counts for the eastern Montana Sage-grouse Management Zone are only 64.9% of the long term average. ⁵⁷ Across Montana, sage-grouse numbers have declined by more than half since 1980. ⁵⁸ Furthermore, hunter harvest estimates have declined even further, dropping from 40,000 birds in 1984 to less than 5,000 in 2011. ⁵⁹ This represents an 87.5% decline in hunter harvest across the State. Please review and share this important sage-grouse data in the final EIS. If you have more site specific information relevant to sage-grouse trends and habitat conditions within the planning area, please reveal it in the DEIS as well.

S-0072-33	Often, public lands recreation provides far more economic benefit to local communities than livestock grazing. Improved environmental conditions that would result from decreased grazing would likely create more jobs and economic development related to outdoor recreation such as hiking, camping, fishing, hunting, and the associated benefits to restaurants, hotels, convenience stores, and other in the area. A 2011 Department of Interior study stated that “[r]ecreation visits to Interior-managed lands in the contiguous United States, Hawaii, and Alaska in 2011 supported over 403,000 jobs and about \$48.7 billion in economic contributions to the communities and regions surrounding Interior-managed land.” ⁸ visits DEIS ignores the economic significance of recreation, an economic benefit that would increase with improved land conditions from decreased grazing.
S-0073-05	Impacts to Blue and Red Ribbon Streams: The impact of oil and gas activities on Blue Ribbon and Red Ribbon (Class I and II) trout streams and the significant recreational benefits these waters provide anglers should be analyzed. Class I and II streams in the Lewistown Field Office include Big Spring Creek, Missouri River and the Smith River.
S-0073-06	Protections for Blue and Red Ribbon Streams: MTU request that the BLM develop stipulations for oil and gas activities that protect health of Class I and II streams, as well as the quality of experience for anglers who frequent these destination fisheries. For instance, the Billings Field Office is considering the application of ½ mile NSO stipulations for both Class I and II streams. In order to protect water quality and the quality of experience that these streams provide, we request that the Lewistown Field Office adopt the same level of protection.
S-0073-12	Conserve Backcountry Areas: As part of the planning process, we suggest that the BLM evaluate areas of public land that are generally intact, undeveloped and that provide high quality fish and wildlife habitat. For lands that meet these criteria, we ask that the BLM allocate or consider designating these lands as “backcountry conservation areas” (BCA) in order to conserve and restore unfragmented fish and wildlife habitat and dispersed hunting and fishing opportunities. Also, we ask that you consider nominations from the public, both for areas that should be allocated as BCAs and appropriate management prescriptions.
S-0087-08	Traditionally, the Shoshone and Bannock peoples were nomadic and migrated throughout the region to sustain their livelihoods. There was no understanding of “permanent settlement” until the United States forced our people to the Fort Hall Reservation. Tribal elders have indicated that when Tribal members went to pursue subsistence there was no boundaries and would freely take subsistence as the need arose. However, federal land managers have since developed campground reservation systems, lotteries and fees limiting Tribal members’ access to traditional subsistence opportunities and reduce access when exercising off-reservation rights to hunt, fish, and gather on unoccupied lands. As the Tribes exercises inherent and reserved treaty rights within their own authorities and responsibilities, federal land developed campground fees, access points, reservation systems, and any other fee-based campground services shall not apply to the enrolled members of the Shoshone-Bannock Tribes. This is in accordance with Article IV of the Fort Bridger Treaty, which does not state, nor was it the intent of our leaders at the time of signing, to impose or restrict Tribal members from exercising off-reservations rights. Again, we have attached our positions statement on camping on federal lands.

SPECIAL DESIGNATIONS (SD)

COMMENT NUMBER	COMMENTS RELATED TO SPECIAL DESIGNATIONS (SD)
S-0003-01	Regarding the 4 "Outstanding Natural Areas" on the Rocky Mountain Front: I have hiked and snowshoed in these areas many times. They are national treasures. I urge you to keep these areas wild and undeveloped. Please allow no motor vehicles here except on those roads that access the borders of the areas.
S-0003-03	The areas should be preserved as wild as possible in hopes that one day they will be designated as "Wilderness"

S-0003-08	I really like the Arrow Creek Breaks. Like the Terry Badlands in eastern Montana it is easy to get a feeling for how wild Montana once was just by hiking away from the road a short distance here. The ruggedly beautiful Arrow Creek Breaks are fragile and easily scarred. Please protect them from the abuses of motor vehicles.
S-0004-04 (DUPLICATE)	Give special consideration to conserving land near existing wildlife refuges or protected areas, are in the Rocky Mountain Front Heritage Act, or provide critical wildlife habitat.
S-0004-08	Pay special attention to the following areas: the Musselshell Breaks near the C.M. Russell National Wildlife Refuge; the Arrow Creek Breaks; the Judith Mountains; prairie lands north of Winnett; and Blind Horse, Ear Mountain, Chute Mountain, and Deep Creek-Battle Creek on the Rocky Mountain Front.
S-0008-02	Most of the BLM lands which bound the Lewis & Clark National Forest along the Rocky Mountain Front are currently designated as 'Outstanding Natural Areas' because of their high-quality wilderness characteristics, cultural & heritage resources, wildlife habitat, and scenic value. Be sure to maintain all these areas as 'Outstanding Natural Areas' and keep the travel plan as is (i.e. for 'traditional' recreational travel for hiking & horseback riding, skiing & snowshoeing, and NO motorized recreational vehicle use).
S-0008-03	I am quite familiar with the BLM ONAs along the Front, and I believe they should be managed just about like you have been managing them in the recent past.
S-0009-02 (DUPLICATE)	In order to support the future of public lands hunting and fishing, I ask that you adopt backcountry conservation areas within the Lewistown RMP to conserve sizeable tracts of lands that are generally intact and undeveloped, and that provide highly-functioning fish and wildlife habitat and dispersed hunting and fishing opportunities. When adopted, backcountry conservation areas should conserve intact and undeveloped BLM lands, prioritize management activities that restore habitats and control noxious weeds, sustain important public access to public lands, and maintain traditional uses of the land that are important to rural communities.
S-0036-01	<p>Emphasize and conduct wilderness inventories on all BLM lands 5000 acres or greater to assess naturalness, opportunities for solitude, opportunities for primitive recreation, and supplemental values such as wildlife, historic and cultural sites, and geologic features in accordance with most recent BLM wilderness guidelines. This should include identification of areas and waterways with wildlife or wildland values that are not fulfilled to their true potential due to noxious weeds, past commercial activities, vandalism, or ground disturbances and that could be restored. Special attention should be given to lands near existing wildlife refuges or protected areas and critical wildlife habitat. Emphasis should be placed on expanding opportunities to improve public access and consolidate public lands through conservation easements, land trades, and land acquisitions.</p> <p>RATIONALE:</p> <ul style="list-style-type: none"> • Wild lands, once lost, cannot be replaced. Without protection, critical wildlife corridors will be lost and native habitats will disappear. Future generations will only be able to see wildlife and wild habitat in books and videos - what a loss!!! • Our nation is dealing with growing obesity epidemic and mental health crisis. Wild places can bring relief to stressed life styles and become superb settings to exercise and build self confidence. We need to preserve these places where people can find healthy and natural recreation. • Access to undisturbed and primitive environments helps children and citizen scientists gain interest in and understanding of science, biology, geology, ecology, environment, natural history, and ancient civilizations.
S-0043-10	We ask that you identify areas of lands that are generally intact and undeveloped and that provide high quality fish and wildlife habitat. We ask that you allocate or designate these lands as "backcountry conservation areas" (BCAs) to conserve unfragmented fish and wildlife habitat and dispersed hunting and fishing opportunities. BHA is working with other hunting and fishing based organizations to identify specific intact and undeveloped lands within the BLM Lewistown District that are appropriate for BCA management, and we will follow up with supplemental recommendations that nominate specific areas as backcountry conservation areas. The following provides specific examples of the appropriate allocations or management approaches that should be applied in the Lewistown RMP when adopting BCAs.

S-0044-03	<p>Of special note is The Nature Conservancy's Pine Butte Swamp Preserve, portions of which are underlain by federal minerals. Peat wetlands at Pine Butte support significant populations of 13 plant species of concern including <i>Braya humilis</i>, <i>Gentianopsis macounii</i>, <i>Primula incana</i>, <i>Salix serissima</i>, <i>Carex craweii</i>, <i>Eleocharis rostellata</i>, <i>Juncus acuminatus</i>, <i>Kobresia simpliciuscula</i>, <i>Trichophorum cespitosum</i>, <i>Trichophorum pumilum</i>, <i>Cinclidium stygium</i>, <i>Meesia triquetra</i>, and <i>Scorpidum scorpioides</i>. These wetlands at Pine Butte are likely the largest peatland complex in Montana. These wetlands were recently recognized by the Montana Native Plant Society as part of its Important Plant Areas Program (http://www.mtnativeplants.org/Important%20Plant%20Areas). Maintenance and protection of surface and sub-surface hydrology in and around the wetlands is crucial for maintenance of the wetland complex. These wetlands also provide critical habitat for many wildlife species, most notably the security and feeding habitat for grizzly bears. Given these significant values we believe this area should receive the highest protections possible, preferably closure to leasing or at minimum no surface occupancy.</p>
S-0045-01	<p>The Montana Native Plant Society's Important Plant Areas (IPA) Program identifies the most important sites for plant conservation across Montana using consistent criteria. An IPA supports an exceptional population of one or more globally rare plants or an exceptional assemblage of plants rare or threatened in Montana. The Lewistown RMP Planning area includes the Pine Butte Peatlands IPA in west-central Teton County. The Pine Butte Peatlands provide habitat for 13 species of concern considered rare in Montana, including <i>Braya humilis</i>, <i>Gentianopsis macounii</i>, <i>Primula incana</i>, <i>Salix serissima</i>, <i>Carex craweii</i>, <i>Eleocharis rostellata</i>, <i>Juncus acuminatus</i>, <i>Kobresia simpliciuscula</i>, <i>Trichophorum cespitosum</i>, <i>Trichophorum pumilum</i>, <i>Cinclidium stygium</i>, <i>Meesia triquetra</i>, and <i>Scorpidum scorpioides</i>. Many of these populations are very large. The Pine Butte Peatlands are possibly the largest peatland complex in Montana. A copy of the Pine Butte Peatlands IPA nomination is enclosed.</p> <p>The Pine Butte Peatlands are fed primarily by sub-surface water from the Teton River moving through intervening alluvial deposits. Maintenance of the functional hydrologic system from the Teton River watershed to the Teton River and surrounding substrates is crucial to the existence of the Pine Butte Peatlands. One potential threat to the Pine Butte Peatlands is oil and gas development. Oil and gas development could directly destroy habitat, disrupt hydrology, or alter and degrade water quality. While there is no BLM surface ownership within the IPA, portions of the IPA are underlain with federally owned minerals. The federal minerals in T24N R8W are subject to a congressional mineral withdrawal, but those in T24N R7W are not. Any decisions regarding federal minerals under the peatlands or in surrounding areas that may affect the peatland hydrology should offer the highest possible protections for these lands, either closure to leasing or no surface occupancy stipulations.</p>
S-0049-14	<p>Accordingly, the EPA recommends that the BLM evaluate setback distances identified through leasing stipulations such as NSO for perennial waters including lakes and reservoirs, intermittent and ephemeral streams, steep slopes, and impaired waters within the planning area. The EPA recommends the following minimum NSO setbacks:</p> <ul style="list-style-type: none"> • Minimum 100 foot NSO setback from slopes greater than 30%; • Minimum 500 foot NSO setback for flowing waters (rivers and streams) or 100-year floodplain, whichever is greater; • Minimum 500 foot NSO setback for lakes, ponds and reservoirs, wetland and riparian areas and springs; • Minimum 750 foot NSO setback for 303(d) Impaired waters; • Minimum 1,000 foot NSO setback for special or significant waters; and • Minimum 100 foot NSO setback for intermittent and ephemeral streams. <p>In addition, we recommend the BLM consider a designation of NSO within Areas of Critical Environmental Concern (ACEC) where important water resources may be impacted.</p>
S-0050-02	<p>Collar Gulch should be opened back up for vehicular public access by opening the gate. The difficult decent and poor road in itself will limit the type and amount of traffic. It seems that the fish have been well protected and after 20 years of the access being closed it should once again be available to members of the public who are not capable of hiking in by way of the Camp Maiden road or the Collar Gulch Trail system. The gulch was a favorite place for many people for many years. The old Collar Mill stone foundation and dam farther up the creek are significant historical sites. And, it's always thrilling to view the fish. Thought should also be given to possibly lifting or</p>

	<p>reducing the size of the Collar Gulch ACEC designation. Is it still necessary? The BLM should survey and mark the boundary between public lands and private property in Collar Gulch.</p>
S-0052-02	<p>Prior to designating SRMAs and ERMAs that contain adjoining private land, the private landowner should be consulted. An agreement should be developed that describes the roles and responsibilities for management of the area - these should include responsibility for trash cleanup, the spread of noxious weeds, the degradation of vegetation, and the maintenance of roadways because of the area being used for recreation. As co-owner of the Vogel Dam, the Brady Ranch is concerned about the problems created by the reservoir being a public recreation site. The Ranch was not consulted prior to the area becoming a designated recreation area and has not been consulted about the stocking of fish that has been taking place. Specific problems resulting from high public visitation are driving on the spillway and dam fill - which, according to the BLM engineer, will eventually result in the failure of these structures - blocking access across the dam to the private property, vandalism and ignoring of signage placed by the property owners, driving off roadways, leaving trash, spreading weeds, fire danger, etc. These problems are as detrimental to the BLM managed property as the private property. These issues need to be addressed or the fish stocking of the Vogel Reservoir will end.</p>
S-0060-01	<p>Increasing demands for energy and other resources, fragmentation of habitats from new roads, the increasing threat of uncharacteristic wildfires, invasive species, and contentious political debates indicate that a backcountry focused land use planning tool is needed in the Lewistown RMP. This tool should recognize and give attention to important wildlife habitat and valued "backcountry" lands, and be applied with a strong restoration emphasis to address modern management challenges.</p>
S-0062-02	<p>If you decide to do away with the ONA designations along the Rocky Mountain Front , please designate these same areas as ACECs. The ONA designation may no longer be useful, but the resource values for these areas have not changed.</p>
S-0070-02	<p>Any lands adjoining existing protected areas such as the Missouri Breaks/CM Russell Nat. Wildlife Refuge. and Lands adjoining the Rocky Mountain Front should receive protection as part of a combined Rocky Mountain Front Heritage Act Strategy.</p>
S-0073-12	<p>Conserve Backcountry Areas: As part of the planning process, we suggest that the BLM evaluate areas of public land that are generally intact, undeveloped and that provide high quality fish and wildlife habitat. For lands that meet these criteria, we ask that the BLM allocate or consider designating these lands as "backcountry conservation areas" (BCA) in order to conserve and restore unfragmented fish and wildlife habitat and dispersed hunting and fishing opportunities. Also, we ask that you consider nominations from the public, both for areas that should be allocated as BCAs and appropriate management prescriptions.</p>
S-0073-04	<p>Collar Gulch Creek currently supports an at-risk population of genetically pure Westslope cutthroat trout that represent the eastern-most population of Westslope cutthroat trout. Given the size of this population and the limited amount of available habitat, this unique population is at risk for extirpation and any habitat degradation – or risk of degradation – is unacceptable. For this reason, MTU request that all BLM lands and subsurface minerals within the entire Collar Creek watershed be designated as an ACEC. We also request that these lands be strictly managed for non-degradation, including closing the ACEC to oil and gas leasing, mineral activity and other uses that could result in the degradation of water quality or other impacts to this irreplaceable population of native trout.</p>
S-0082-02	<p>I am also concerned about four "Outstanding Natural Areas" along the Rocky Mountain Front – Blind Horse, Ear Mountain, Chute Mountain, Deep Creek-Battle Creek. These four areas total 13,087 acres. They are included in the Rocky Mountain Front Heritage Act, but until the act is passed, we need to make sure they are conserved in the BLM plan.</p>

SOCIO-ECONOMIC (SE)

COMMENT NUMBER	COMMENTS RELATED TO SOCIO-ECONOMICS (SE)
S-0009-02 (DUPLICATE)	In order to support the future of public lands hunting and fishing, I ask that you adopt backcountry conservation areas within the Lewistown RMP to conserve sizeable tracts of lands that are generally intact and undeveloped, and that provide highly-functioning fish and wildlife habitat and dispersed hunting and fishing opportunities. When adopted, backcountry conservation areas should conserve intact and undeveloped BLM lands, prioritize management activities that restore habitats and control noxious weeds, sustain important public access to public lands, and maintain traditional uses of the land that are important to rural communities.
S-0034-29	The negative social and economic impact experienced by motorized recreationists when motorized recreational opportunities do not exist in nearby public lands must be adequately evaluated and considered in the decision-making.
S-0046-10	I attended the Lewistown scoping session where you told me I should send you my comments via e-mail, which I am doing. Let me conclude by saying I strongly support development of the Crystal Caves-New Year complex as a tourist attraction. I believe most residents of Central Montana support this development. I believe such a development would have a great economic impact on Lewistown and the surrounding area. I believe as many or more visitors would come to Crystal Caverns as now go to Lewis and Clark Cavern. And finally, I understand that you are including development of Crystal Caverns in your new management plan. I hope that is the case and that you carry on with your studies and preparations so the Caverns-Mine complex can become a major Montana tourist attraction.
S-0049-35	Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," applies to federal agencies that conduct activities that substantially affect human health or the environment. Consistent with this order, the EPA recommends the NEPA analysis for the Lewistown RMP include the following: <ul style="list-style-type: none"> • Identification of any minority, low-income and tribal communities within the geographic scope of the impact area, including the sources of data and a description of the methodology and criteria utilized. The EPA recommends comparing census block group percentages (if available, or, at a minimum, census tract data) for below poverty and minority populations with the state average, and conducting the following steps if a block group percentage is greater than the state average. The EPA does not recommend use of higher thresholds. • A detailed assessment of environmental justice and other socioeconomic concerns for any environmental justice communities, to the extent information is available, including: <ul style="list-style-type: none"> • A discussion of the potential direct, indirect and cumulative environmental impacts of potential BLM-authorized RMP activities on the health of these communities, including air quality and water quality and quantity impacts. • An evaluation of the socio-economic impacts to the local communities, including the potential for any additional loading placed on local communities' abilities to provide necessary public services and amenities. • A determination of whether there may be disproportionately high and adverse impacts, including cumulative impacts, on the identified communities. • Mitigation measures to reduce any disproportionate adverse impacts. We recommend involving the affected communities in developing the measures. The EPA recognizes the need for early involvement of the local communities, and supports the meaningful participation of community representatives in the NEPA process.
S-0051-01	<ul style="list-style-type: none"> • Manage vegetation with continued livestock grazing which improves habitat for sage grouse, reduces fire fuel load, and keeps viable ranches in operation. Viable ranches keep open space available for wildlife, and provide a stable economic base in small communities.
S-0051-10	<p>Livestock Grazing</p> <ul style="list-style-type: none"> • Maintain livestock stocking rates to benefit viable ranching operations, local economy, wildlife, and fire management.

S-0051-11	<ul style="list-style-type: none"> • Work with permittees to add flexibility to grazing plans which could add diversity and management options benefiting both the operation and the resource.
S-0051-12	<p>Land Tenure Adjustment</p> <ul style="list-style-type: none"> • Consider the influence of any changes of ownership on local economy and customs.
S-0056-01	<p>1. Use a systematic interdisciplinary approach to integrate physical, biological, economic, and other sciences.</p> <p>BLM should place a high priority on consistency when evaluating human activities' impact on the landscape when assessing existing uses and developing new management directives. For example, when evaluating the safety concerns associated with various forms of outdoor recreation (mountain biking, recreational shooting, hiking, horseback riding), it is critical that BLM use comparable metrics such as accident statistics to identify legitimate safety issues and convey them to the public via the formal planning process. Additionally, BLM should take great care to evaluate and utilize economic and participation data throughout the planning process. According to the U.S. Fish and Wildlife Service's 2011 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation, 267,000 anglers spent 2,450,000 days fishing in Montana and spent \$339,383,000 doing so. Additionally, 150,000 hunters spent 2,493,000 days hunting and spent \$627,298,000 on trip-related expenditures, equipment and other items associated with hunting in that year alone. In 2011, 7.2 million people nationwide shot recreationally, with only 2.9 million visiting shooting ranges. Many of these remaining 4.1 million recreational shooters depend on access to informal shooting on federal land in order to continue recreating as they have for many decades. When considering management proposals or activities that would impede access to hunting, fishing or recreational shooting throughout the planning process, BLM should take these figures and others into consideration. Additionally, BLM should note and discuss the impact that impeding recreational access would have on local economies, the ability to collect state and local taxes and revenues collected through the Wildlife and Sportfish Restoration programs which collect taxes on the manufacture of firearms, ammunition, fishing tackle and other outdoor equipment taxed to support conservation.</p>
S-0059-13	<p>Recreational opportunities provided by wilderness quality lands lead directly to economic benefits to surrounding local communities . . . Because of the nature of the communities residing in the Lewistown planning area, we advise the BLM to examine the report by the Sonoran Institute "Prosperity in the 21st Century West – The Role of Protected Lands." This report found that: Protected lands have the greatest influence on economic growth in rural isolated counties that lack easy access to larger markets. From 1970 to 2000, real per capita income in isolated rural counties with protected land grew more than 60 percent faster than isolated counties without any protected land. This clearly shows that wilderness quality lands and their due protection are economically vital for local economies.</p>
S-0063-01	<p>As a federal land management agency responsible for managing public land for a multiple of uses, the Cascade County Commissioners encourage you to fairly balance conservation and commercial uses. Given the fragmented nature of many BLM lands, it is especially important to ensure that management prescriptions are compatible with surrounding lands. At the same time, decisions made now will be longstanding and should be made with a view toward the future.</p>
S-0072-26	<p>Additionally, any analysis of grazing is incomplete without a discussion of the effect the practice has had on predators. The most vehement opposition to wolves, bears, and other predators comes from the livestock industry, and is one of the main reasons some of the species are now listed. Predators perform important top-down ecological functions, yet they are consistently eradicated and heavily managed in order to protect livestock on public land, costing taxpayers millions of dollars. The DEIS must include an analysis of the impacts from livestock grazing on predators in the planning area.</p>

S-0072-30	The LRMP must meet the requirements of the Federal Land Policy Management Act (“FLPMA”). FLPMA requires the BLM “take action necessary to prevent unnecessary or undue degradation of the lands[.]” 43 U.S.C. § 1732 (b). FLPMA also requires that the BLM manage lands for multiple use “without permanent impairment of the productivity of the land and the quality of the environment with consideration being given to the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output.” 43 U.S.C. § 1702(c).
S-0072-31	While the BLM’s need not choose the alternative with the greatest economic return, the BLM also fails to calculate the economic value of grazing. The economic and social value of public lands livestock grazing receives disproportionate weight in BLM planning documents. The importance of public lands grazing to the economy of the region is grossly overestimated. The calculation of the social and economic values of the draft plan should demonstrate a clear understanding and consideration of the conflicts between continued grazing and other uses of the public lands. The BLM must provide a more thorough analysis of the social and economic values of different livestock grazing levels. This analysis must consider the administrative costs of a grazing policy, economic benefits from recreation where grazing is reduced or eliminated, and the cost of negative environmental consequences of livestock grazing in the area.
S-0072-32	The administrative costs of public lands grazing are often underestimated in BLM planning documents. Considering only direct costs, BLM range management costs in 2011 totaled \$77.3 million, while income from grazing fees was only \$4.5 million, leaving a net deficit to the U.S. Treasury was \$72.8 million. ⁷⁹ This loss on federal grazing programs fails to consider indirect costs, such as administration of the range program. Estimates of those indirect costs rise well over \$100 million. ⁸⁰ The economic calculations in the DEIS should not ignore potential administrative cost savings from reduced grazing. Decreased grazing would save the BLM costs associated with environmental analysis, litigation, grazing permit administration, predator control, weed spraying, and costly efforts to preserve species harmed by grazing.
S-0072-33	Often, public lands recreation provides far more economic benefit to local communities than livestock grazing. Improved environmental conditions that would result from decreased grazing would likely create more jobs and economic development related to outdoor recreation such as hiking, camping, fishing, hunting, and the associated benefits to restaurants, hotels, convenience stores, and other in the area. A 2011 Department of Interior study stated that “[r]ecreation visits to Interior-managed lands in the contiguous United States, Hawaii, and Alaska in 2011 supported over 403,000 jobs and about \$48.7 billion in economic contributions to the communities and regions surrounding Interior-managed land.” The DEIS ignores the economic significance of recreation, an economic benefit that would increase with improved land conditions from decreased grazing.
S-0072-34	The LRMP must address the costs of environmental degradation. The value lost from negative environmental impacts to water quality and quantity, aquatic species habitat, riparian and upland wildlife habitat quality and quantity, and native vegetation should be calculated. The DEIS must also address the potential for further exotic species and weed expansions, the costs associated with weeds and flammable invasive species, and the resulting potential for species loss. The viability of wildlife and rare plant populations and the cost to protect and preserve them in the face of chronic grazing degradation demands BLM’s attention. If the BLM is to rise to its calling as land administrator for the public, the beauty and intrinsic value of the land, as described by Aldo Leopold, must also be addressed.
S-0072-35	In accordance with its multiple use mission, the BLM must consider land uses other than grazing in its calculation of the economic and social values of each alternative, including administrative costs and environmental impacts to water, wildlife, plants, recreation, potential species loss, intrinsic land value, and beauty. Under the Taylor Grazing Act, the BLM must prevent injury to public lands. The current grazing utilization levels are unsustainable and the proposed plan must not continue grazing at unsustainable levels. Restoration of the land will require costly action by the BLM. Taking into account the overestimated costs and underestimated benefits of reducing grazing in the planning area, the BLM must provide a thorough and balanced analysis that considers the factors addressed in this comment.

S-0072-39	<p>Because of economic pressures and uncertainty, many ranchers in the West would like to voluntarily retire their grazing permits, and the LRMP and Final EIS should grant ranchers the freedom to retire their permits if voluntarily waived to the BLM. Voluntary grazing permit retirement would offer permittees a new economic opportunity while providing protection and restoration for the land managed by the Lewistown and Butte BLM offices. All alternatives analyzed in the DEIS and the chosen alternative for the LRMP need to include specific direction and language authorizing the permanent retirement of voluntarily waived BLM grazing permits. Suggested language for authorizations is as follows:</p> <p>Grazing privileges that are lost, relinquished, canceled, or have base property sold without transfer would have attached AUMs held for watershed protection and wildlife habitat. (Adapted from the Challis Resource Area Proposed LRMP and Final EIS, October 1998, p. 87).</p>
S-0086-11	<p>BLM is required under 43 CFR § 1610.4-4 (g) to analyze the level of dependence of local communities on resources from public lands during land use planning. As such, the BLM Land Use Planning Handbook (H-1601-H) and Instruction Memorandum No. 2002-167 each address social and economic analysis for land use planning. Factors required to be analyzed include: demographic, economic, social and fiscal conditions and land use patterns. In addition, existing conditions and trends, as well as the impacts to conditions and trends associated with each alternative must be assessed along with the income and employment associated with all economic sectors, community infrastructure, state and local revenues and expenditures, and land use patterns. Further, NEPA requires analysis of socio-economic impacts in order to ensure that agency decisions do not result in a financial burden upon the communities which rely on public lands for their livelihoods and revenue. It is crucial for the Lewistown economic impact analysis to directly recognize that the economic benefits to local communities and the State of Montana from oil and gas development will decrease proportionately due to the limitations imposed on future oil and gas development by BLM.</p>

SOIL RESOURCES AND GEOLOGY (SR)

COMMENT NUMBER	COMMENTS RELATED TO SOILS AND GEOLOGY (SR)
S-0003-08	<p>I really like the Arrow Creek Breaks. Like the Terry Badlands in eastern Montana it is easy to get a feeling for how wild Montana once was just by hiking away from the road a short distance here. The ruggedly beautiful Arrow Creek Breaks are fragile and easily scarred. Please protect them from the abuses of motor vehicles.</p>
S-0004-03 (DUPLICATE)	<p>Identify areas and waterways with wildlife or wildland values that are not fulfilling their potential because of noxious weeds, past commercial activities or ground disturbances that could be restored.</p>
S-0006-05 (DUPLICATE)	<p>Identify sites with noxious weeds and where off-road vehicles have scarred the land or conflict with other users. Urge the BLM to take steps - even if only temporary - to keep those problems from getting worse.</p>
S-0034-38	<p>The amount of sediment production from federal lands is relatively small compared to sediment production that ultimately reaches stream courses from non-federal lands.</p>
S-0036-01	<ul style="list-style-type: none"> • Emphasize and conduct wilderness inventories on all BLM lands 5000 acres or greater to assess naturalness, opportunities for solitude, opportunities for primitive recreation, and supplemental values such as wildlife, historic and cultural sites, and geologic features in accordance with most recent BLM wilderness guidelines. This should include identification of areas and waterways with wildlife or wildland values that are not fulfilled to their true potential due to noxious weeds, past commercial activities, vandalism, or ground disturbances and that could be restored. • Access to undisturbed and primitive environments helps children and citizen scientists gain interest in and understanding of science, biology, geology, ecology, environment, natural history, and ancient civilizations.

S-0046-02	A second note that is of importance to me is that the Caverns always be associated with the New Year Mine. If this is going to be a tourist attraction, we must use every means possible to lure tourists or visitors to the location. Most visitors will want to see the Caverns. The mine tunnel, if available to them, would be of secondary importance. But there are mining buffs, Old West history buffs (of which I am one) and others to whom mining is a very important endeavor and the association with New Year Mine would increase interest in seeing this feature. The adit or entry tunnel could feature, at its far end, a mining diorama which would include the old mining cart still in there. The tracks would be kept in place and the area well lighted. The diorama or dioramas could tell the story of New Year Mine and of Crystal Caverns.
S-0046-08	Crystal Caverns and New Year Mine should be viewed in a much larger historical context, that of the Judith Mountains and environs. You had two major mining towns there, Maiden and Gilt Edge, and many smaller towns including New Year. Maiden at one point had 3,000 people and was considered, along with Cottonwood and Lewistown, for the Fergus County seat. James Fergus favored Lewistown so you see who won.
S-0046-09	The Judith range is home to a rare fish, it was once home to an Air Force radar station, also a bible school, an historic Girl Scout camp and several major mines like the Gilt Edge, Spotted Horse and Maginnis mines. The Maginnis is owned by a Maiden resident who continues to work it. Hundreds of thousands of dollars of gold and silver came out of those three mines and many others. The New Year Mine was operated for some time but was not a big producer. There also are tales that Spanish gold is hidden in the Judiths awaiting the finder. Of all the island mountain chains in the Lewistown area, the Judiths have the richest history. All of this could be told in dioramas in the adit or elsewhere.
S-0047-01	In addition, the quantity of water needed to hydraulically fracture a well must be incorporated in the EIS. It is the duty of the BLM to consider the geology, hydrogeology and hydrology of every area where oil and gas development may occur.
S-0049-11	<p>The EPA also recommends the RMP/EIS include the following information:</p> <ul style="list-style-type: none"> • Maps and descriptions of topography and soils, specifically steep slopes and fragile or erodible soils, especially near surface waters and intermittent/ephemeral channels.
S-0049-12	We recommend that the RMP/EIS analyze potential impacts to surface waters related to erosion and sedimentation from land disturbance and stream crossings, as well as potential impacts associated with oil and gas well development, including drilling and production and potential spills and leaks from pits, evaporation ponds, and pipelines. We also recommend analyzing potential impacts to impaired water bodies within and/or downstream of the planning area, including water bodies listed on the most recent EPA-approved CWA § 303(d) list. Where TMDL analyses for impaired water bodies within, or downstream of, the planning area still need to be developed, we recommend that proposed activities in the drainages of CWA impaired or threatened water bodies be either carefully limited to prevent any worsening of the impairment or avoided where such impacts cannot be prevented.
S-0049-13	To fully disclose and, if necessary, mitigate the potential impacts of soil disturbance, we recommend that the RMP/EIS include an estimate of erosion rates and resulting impacts to water quality for each alternative. Erosion rates were calculated using the Water Erosion Prediction Project model (WEPP), a webbased interface developed by the U.S. Department of Agriculture, Agricultural Research Service, which can be accessed at http://www.ars.usda.gov/Research/docs.htm?docid=18084&pf=l . We recommend that the BLM consider using this model or another appropriate model that would be applicable to this planning area.
S-0062-05	At the same time, the District Manager stated he did not foresee closing very many roads. I don't have any specific roads to recommend closing, but I would ask that you look seriously at road gradient and potential for soil erosion when considering which roads to leave open. There are a couple of roads in the monument that I can think of that are very steep and never should have been left open (the road down to Hole-in-the-Wall and the Bullwhacker Road where it drops down to the river). Roads such as these are dangerous and are highly susceptible to erosion. OHV on some other roads contributes to the spread of noxious weeds.

S-0065-04	Give special consideration to areas that have been previously disturbed and can be restored to their full potential as recreational and multi-use sites. Public lands with high levels of disturbances are not able to be used to their full potential. Creating a plan for noxious weed and erosion management will allow these places to be put to full use, which will improve the sites for future generations.
S-0066-02	2nd issue is the chronic traveling off-road on highly erodible soils, and needing to go as far as to look at Administrative Off-Road Travel Policy on highly erodible soils, especially when it is wet and muddy!
S-0068-01	"Issues for this parcel: ORV use, erosion of former logging roads, noxious weeds, conflicts with bears and subdivision development to the south (Elk Meadows)" Comment noted on map of the planning area at a public scoping meeting; BLM parcel close or adjacent to Highway 200 approximately 6 miles south of Dearborn River.
S-0072-05	<p>In the Anticipated Planning Issues Management Concerns document provided with the scoping notice, the BLM offers the following in regard to livestock grazing:</p> <p>Preliminary Planning Considerations</p> <ul style="list-style-type: none"> ➤ Conform with existing laws, regulations, and BLM policy pertaining to livestock grazing on public lands ➤ Incorporate Montana Standards for Rangeland Health and Guidelines for Livestock Grazing Management ➤ Consider ecological site inventory information ➤ Protect important biological resource functions that provide for soil stability, water quality, and healthy riparian and upland vegetation communities ➤ Provide for the protection and restoration of native species and potential natural communities ➤ Authorize use to minimize environmental impacts under the principles of multiple use and sustained yield. <p>The LRMP must specifically address how these goals will be achieved. For example, Guideline #1 of the Montana Standards for Rangeland Health and Guidelines for Livestock Grazing Management provides that "[g]razing will be managed in a manner that will maintain the proper balance between soils, water, and vegetation over time." While such guidelines articulate important goals, those goals will not be achieved without requiring that land managers meet quantitatively measurable terms and conditions. The LRMP must provide clear, quantitative terms and conditions to guarantee compliance with those guidelines.</p>
S-0072-16	In spite of the evidence of widespread loss of plant productivity and ground cover, accelerated erosion and BLM's own documentation of rapid declines in species such as sage-grouse, BLM routinely chooses not to address livestock impacts in any scientific or sustainable fashion. The LRMP must acknowledge the negative impacts of livestock grazing and propose significant grazing reductions to address these impacts.
S-0072-23	A recent study published in the Journal of Applied Ecology concludes that livestock grazing contributes to the domination of some western landscapes by cheatgrass, an invasive grass that both destroys sage-grouse habitat and increases the frequency of wildfire. ⁷⁰ To mitigate the spread of cheatgrass, the study suggests maintaining and restoring bunchgrasses and soil crusts, two ecological features quickly degraded under the hooves of livestock. Such mitigation would require the decrease or elimination of livestock grazing in the affected areas.
S-0073-10	<ul style="list-style-type: none"> • Impacts of Oil and Gas Development: The environmental analysis should identify the potential impacts oil and gas development will have on fisheries, including conservation populations of Westslope cutthroat trout, impacts to streams with potential for the restoration and reintroduction of Westslope cutthroat trout, and impacts to Class I and II streams. Additionally, this analysis needs to consider that there are two potential sources of impacts from oil and gas development: 1) surface disturbances and associated erosion and sedimentation, and 2) contamination from spills and other accidental releases of chemicals and wastes associated with drilling and production and activities. Any development within a watershed introduces the risk of a spill and the resultant impacts to aquatic habitat and fisheries; these impacts can range from minimal to catastrophic depending on the severity of a given spill. The dual nature of oil and gas impacts (sediment and spills) emphasizes the need for ½ mile NSO stream buffers – the greater the spatial separation between oil and gas development and surface waters, the less chance that a spill

	will reach and impact a given water body.
S-0074-04	*Identify sites where off-road vehicles have scarred land, have spread noxious weeds, and have created user conflicts and take immediate steps, even if only a holding action, to keep those problems from getting worse, until they can be properly addressed in the travel management plan.
S-0077-03	*Motorized Vehicles - Although the Draft RMP will not address travel management, but in areas where off-road vehicles are scarring the land, spreading noxious weeds, and/or creating user conflicts actions should be taken to prevent further damage. Even if limits or closure are imposed only as holding actions until they can be properly addressed in the travel management plan, it is important to prevent existing problems from becoming worse.
S-0083-05	*Prevent Damage from Motorized Vehicles: This is a particular sore point with me and I hope BLM identifies sites where off-road vehicles have scarred the land, have spread noxious weeds, and have created user conflicts - and take immediate steps, even if only a holding action, to keep those problems from getting worse until they can be properly addressed in your travel management plan.
S-0087-02	In general, the Tribes does not support fencing, surface disturbing activities, development of building and structures (e.g., water development projects, power lines, etc.), and agriculture on public lands.

TRIBAL INTERESTS (TI)

COMMENT NUMBER	COMMENTS RELATED TO TRIBAL INTERESTS (TI)
S-0049-35	<p>Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," applies to federal agencies that conduct activities that substantially affect human health or the environment. Consistent with this order, the EPA recommends the NEPA analysis for the Lewistown RMP include the following:</p> <ul style="list-style-type: none"> • Identification of any minority, low-income and tribal communities within the geographic scope of the impact area, including the sources of data and a description of the methodology and criteria utilized. The EPA recommends comparing census block group percentages (if available, or, at a minimum, census tract data) for below poverty and minority populations with the state average, and conducting the following steps if a block group percentage is greater than the state average. The EPA does not recommend use of higher thresholds. • A detailed assessment of environmental justice and other socioeconomic concerns for any environmental justice communities, to the extent information is available, including: <ul style="list-style-type: none"> • A discussion of the potential direct, indirect and cumulative environmental impacts of potential BLM-authorized RMP activities on the health of these communities, including air quality and water quality and quantity impacts. • An evaluation of the socio-economic impacts to the local communities, including the potential for any additional loading placed on local communities' abilities to provide necessary public services and amenities. • A determination of whether there may be disproportionately high and adverse impacts, including cumulative impacts, on the identified communities. • Mitigation measures to reduce any disproportionate adverse impacts. We recommend involving the affected communities in developing the measures. The EPA recognizes the need for early involvement of the local communities, and supports the meaningful participation of community representatives in the NEPA process.
S-0087-01	Under Article 4 of the Treaty with the Eastern Band Shoshoni and Bannock of 1868 (15 Stat. 673), the Tribes "have the right to hunt on the unoccupied lands of the United States so long as game may be found thereon, and so long as peace subsists among the whites and Indians on the borders of the hunting districts". Therefore, the most important thing that BLM can do is to acknowledge in the Executive Summary and Introduction of the RMP/EIS that management is consistent with the Treaty Rights retained by the Shoshone-Bannock Tribes.

S-0087-02	In general, the Tribes does not support fencing, surface disturbing activities, development of building and structures (e.g., water development projects, power lines, etc.), and agriculture on public lands.
S-0087-03	The Tribes does support vast open space and landscapes that support abundant populations of native fish, wildlife, and plant species.
S-0087-04	we would like the BLM to establish goals and objectives for: 1) government to government consultation with the Tribes, 2) ensuring management actions are consistent with Treaty Rights retained by the Tribes, and 3) how to maintain or increase open space and actions that promote high quality habitat for native fish, wildlife, and plant communities.
S-0087-05	We would also like the BLM to develop goals and objectives that allow buffalo expansion and population recovery of sage grouse and other special status species on public lands within the planning area.
S-0087-06	We are also greatly concerned with the impacts of climate change and how federal land management actions may be contributing to climate change. Not only does the development of solid minerals, fluid minerals, and energy fragmentation and reduce habitat for wildlife, fish, and native plants, this type of development can contribute to climate change. For example, native plant communities are known to sequester carbon and ameliorate climate. Surface disturbance and occupancy reduces the ability of native plant communities to provide climate regulating ecosystem services. Emissions that result for fluid minerals contributes directly to climate change through increased radiant forcing. Although, these types of actions may seem limited to the region the effects of climate change impact the globe. Therefore, we do not support actions posed by the BLM that contribute to positive radiant forcing. We do support actions that help mitigate the effects of climate change. For example, establishing management actions and objectives to promote climate regulating ecosystem services and maintenance and enhancement of large landscapes dominated by native vegetation. To better help you understand our position on climate change we have attached our Climate Change Policy.
S-0087-07	We also want to inform you of our policy on land tenure adjustments. The Tribes opposes any federal land disposition, sale, or transfer to private entities or state and local governments based upon two fundamental reasons. First, the United States government entered into a solenm treaty with the Shoshone and Bannock tribal peoples in which the Tribes reserved certain off-reservation hunting, fishing, and gathering rights which we continue to exercise on unoccupied lands of the United States. Secondly, the United States, including its federal agencies, have a trust responsibility as established in the Fort Bridger Treaty and other federal laws, policies and executive orders to protect and preserve the rights ofIndian tribes, and to consult with the Tribes prior to such land sales or transfers. To better understand our position we have attached our position statement regarding the transfer of federal lands.
S-0087-08	Traditionally, the Shoshone and Bannock peoples were nomadic and migrated throughout the region to sustain their livelihoods. There was no understanding of "permanent settlement" until the United States forced our people to the Fort Hall Reservation. Tribal elders have indicated that when Tribal members went to pursue subsistence there was no boundaries and would freely take subsistence as the need arose. However, federal land managers have since developed campground reservation systems, lotteries and fees limiting Tribal members' access to traditional subsistence opportunities and reduce access when exercising off-reservation rights to hunt, fish, and gather on unoccupied lands. As the Tribes exercises inherent and reserved treaty rights within their own authorities and responsibilities, federal land developed campground fees, access points, reservation systems, and any other fee-based campground services shall not apply to the enrolled members of the Shoshone-Bannock Tribes. This is in accordance with Article IV of the Fort Bridger Treaty, which does not state, nor was it the intent of our leaders at the time of signing, to impose or restrict Tribal members from exercising off-reservations rights. Again, we have attached our positions statement on camping on federal lands.

TRAVEL MANAGEMENT (TM)

COMMENT NUMBER	COMMENTS RELATED TO TRAVEL MANAGEMENT (TM)
S-0003-01	Regarding the 4 "Outstanding Natural Areas" on the Rocky Mountain Front: I have hiked and snowshoed in these areas many times. They are national treasures. I urge you to keep these areas wild and undeveloped. Please allow no motor vehicles here except on those roads that access the borders of the areas.
S-0003-04	I really like hiking in the breaks and prairie along the Musselshell and Missouri Rivers. I love the big sky here, the extremes in weather and the feeling that this is what Montana was a couple hundred years ago. Please restrict motor vehicles to only those roads that are essential to access these areas. Close and reclaim any roads that are in excess of a basic transportation network.
S-0003-06	You should do a complete inventory of noxious weed problems and then take effective steps to control the issue. Where off road vehicles have scarred the land and intensified the spread of weeds please put some effective controls on motor vehicles. Restrict motor vehicles to designated roads only. Please leave in place only the road network that provides basic transportation. The less roads you keep the wilder and more natural the landscape will be.
S-0003-08	I really like the Arrow Creek Breaks. Like the Terry Badlands in eastern Montana it is easy to get a feeling for how wild Montana once was just by hiking away from the road a short distance here. The ruggedly beautiful Arrow Creek Breaks are fragile and easily scarred. Please protect them from the abuses of motor vehicles.
S-0004-05 (DUPLICATE)	Identify sites with noxious weeds and where off-road vehicles have scarred the land or conflict with other users. Urge the BLM to take steps - even if only temporary - to keep those problems from getting worse.
S-0007-02	Having canoed the Missouri River numerous times since 1979, I am concerned about cottonwood regeneration, invasion of noxious weeds, loss of solitude and quiet, destruction of riparian habitat by motorized travel, (air, land and water) and livestock use.
S-0007-03	The new Resource Management Plan must protect resources first and BLM must be bold in barring uses that threaten native vegetation and critical wildlife habitat. Extractive uses such as mining, timber and grazing as well as motorized recreation must take second place when it coming to managing BLM lands in central MT.
S-0008-02	Most of the BLM lands which bound the Lewis & Clark National Forest along the Rocky Mountain Front are currently designated as 'Outstanding Natural Areas' because of their high-quality wilderness characteristics, cultural & heritage resources, wildlife habitat, and scenic value. Be sure to maintain all these areas as 'Outstanding Natural Areas' and keep the travel plan as is (i.e. for 'traditional' recreational travel for hiking & horseback riding, skiing & snowshoeing, and NO motorized recreational vehicle use).
S-0009-02 (DUPLICATE)	In order to support the future of public lands hunting and fishing, I ask that you adopt backcountry conservation areas within the Lewistown RMP to conserve sizeable tracts of lands that are generally intact and undeveloped, and that provide highly-functioning fish and wildlife habitat and dispersed hunting and fishing opportunities. When adopted, backcountry conservation areas should conserve intact and undeveloped BLM lands, prioritize management activities that restore habitats and control noxious weeds, sustain important public access to public lands, and maintain traditional uses of the land that are important to rural communities.
S-0013-07	BAN ALL NEW ROADS. CLOSE OFF SOME OLD ROADS.
S-0034-02	we feel strongly that there can be "no net loss" of motorized recreational opportunities with the Lewistown Resource Management Plan DEIS project.
S-0034-04	The agency can no longer ignore the significant cumulative effect that all of the motorized closures over the past 30 years have had on motorized recreationists.
S-0034-05	There is nothing radically wrong with the existing condition except that it does not meet all of the needs of motorized recreationists, does not provide equal opportunity, and does not adequately address the growing needs of motorized recreationists.

S-0034-06	We request that the BLM provide an adequate and fair evaluation of: 1. The needs of motorized recreationists and the cumulative impacts of motorized closures, 2. All existing routes including those meeting National OHV guidelines and currently closed routes, 3. The current imbalance of non-motorized to motorized trails, and 4. At least one pro-recreation alternative in the analysis. 5. Under the existing condition, too much of the Lewistown Field District area is set-aside for segregated exclusive non-motorized use for 1% of the visitors to the area. We do not agree with all of the effort that the agency is going through to segregate users. Multiple-use lands are public places. Segregation in public places has not been acceptable since the Civil Rights Act of 1964 (http://www.ourdocuments.gov/doc.php?flash=true&doc=97%page=transcript). In order to reasonably meet the requirements of integration a reasonable management goal for 99% of the BLM land would be for shared multiple-use that would produce a 50/50 sharing and equal opportunity of non-motorized/motorized trail opportunities. 6. The quality of the human environment deserves significant consideration in the analysis and decision.
S-0034-07	The Lewistown Resource Management Plan DEIS must include adequate evaluation of cumulative effects so that motorized recreation will not be removed from our public lands. An adequate evaluation of cumulative effects would include all past, current, and reasonably foreseeable actions that have or will produce motorized closures in the State. The environmental analysis must adequately address the human environmental including issues, needs, alternatives, and impacts on the public associated with the reduction or lack of adequate motorized recreation. An adequate analysis would include evaluation of significant social, cultural, historical use, current use, future needs, economic impact, and quality of the human environment issues from the perspective of motorized recreationists.
S-0034-08	A reasonable alternative should address: a. Sharing non-motorized trails with mountain bikes and motorcycles, b. Creating new mountain bike and motorcycle trails, c. Creating ATV trails from roadbeds that both currently open and closed, d. Creating new ATV trails e. Creating new ATV trails that connect with converted roadbeds to create loops, and, f. Establishment of 4x4 challenge routes using roadbeds that are both currently open and closed including historic mining routes.
S-0034-09	A program similar to the following would help the agency better understand the needs of motorized single-track trail riders which have been ignored in the analysis.
S-0034-10	Public understanding of the proposed alternatives would be greatly improved by implementing a mapping tool similar to the one developed by Idaho Parks and Recreation. This tool can be tried out at http://www.trails.idaho.gov/trails/ . Zoom in and click on a particular trail to see the information provided for each route. Earlier versions of this tool included GPS downloads for each route which would help assure that the public was on the right trail. This tool would also be useful after the analysis and decision to inform the public of the route designations.
S-0034-11	There are no significant motorized single-track trails in the proposed action. This is a significant need and the significant issue associated with not addressing this need has not been adequately addressed.
S-0034-12	The needs of the aging baby boomer population and their desire for adequate motorized access and motorized recreation is a significant issue that is brought up continually at our monthly meetings and in many discussions with other motorized recreationists. This significant issue must be recognized and given a hard look in the Purpose and Need, adequately addressed as part of the human environment and adequately addressed by the development of a reasonable Pro-Recreation alternative. We request that the Purpose and Need for this action be written to address the significant need for motorized access and motorized recreation in the project area including adequate recognition of the positive impact on the quality of the human environment. The BLM can help address this significant problem by providing an adequate quantity and quality of motorized recreational opportunities. We ask that you adequately address this significant issue associated with the human environment.
S-0034-14	First, the needs of the human environment for motorized recreation should be considered part of the natural environment (as required by the original NEPA) and adequately considered in the evaluation. Secondly, massive impacts from natural events such as fires, floods, and pine beetle (we have witnessed all of them recently) are considered acceptable while relatively miniscule impacts from motorized recreation are considered unacceptable.
S-0034-15	Single-track reaches should be designated for motorcycle and mountain bike use, 48" width areas

	should be designated for ATV use, and reaches wider than 48" should be designated for UTV and 4x4 use. Open riding areas should be designated for trials bikes which have different riding area requirements than trail riding. Motorized trails systems should provide for all levels of skill so that the needs of all levels of motorized users and all types of motorized vehicles are adequately addressed. The motorized route designation process should also adequately consider the mileage of trails required for weekend camping trips, adequate destinations, and other factors. We ask that motorized recreationists be adequately queried as part of the process and that the site-specific conditions that they identify be considered as required by the Final Management Strategy.
S-0034-16	We request that this evaluation carefully consider the intent of the Final OHV Management Strategy and use it to designate existing motorized routes and create new motorized routes.
S-0034-17	There is a significant need for Youth Loops. Youth Loops would include a small area of several acres, either contained by fencing or clearly marked boundary, with short, tight trail system that is designed to entertain kids under adult supervision. The youth loop offers an alternative to unauthorized routes near camp areas and riding in campgrounds.
S-0034-18	The BLM must give a hard look at the impact of motorized closures on the human environment. The cumulative effect of all motorized closures has been significant and is growing greater every day yet they have not been adequately addressed.
S-0034-19	We request that the agency not use the existing motorized trail inventory for designating non-motorized trails. Instead, if there is a need for non-motorized trails, then the agency should consider options that do not reduce the existing opportunity for motorized users.
S-0034-20	The project team must formulate at least one alternative that emphasizes OHV use in Roaded Natural and Semi-Primitive Motorized opportunity settings for recreation.
S-0034-21	Alternatives should include areas where OHV trails can be constructed and maintained when demand increases.
S-0034-22	Where cattle grazing has established a network of cow trails, a reasonable alternative would be to allow motorcycle use on these single-track trails as there would be no change in impact or visible use of the trails.
S-0034-23	The action must develop a preferred alternative that mitigates the significant impacts on the public from the loss of motorized access and motorized recreational opportunities from the proposed action and the combined cumulative effect of all other actions in the state.
S-0034-24	The existing level of motorized access and recreation is reasonable alternative and an alternative other than No Action must be built around it. This reasonable alternative should also include mitigation to protect the natural environment and compensate motorized recreationists for the significant cumulative effect of past losses, and enhancement to adequately address the growing need for motorized access and recreation.
S-0034-25	The scope of the project must address both existing routes and new construction.
S-0034-26	A reasonable goal for the allocation of trails should be 50/50 sharing and equal opportunity of motorized/non-motorized trails.
S-0034-27	A reasonable alternative that must be adequately addressed is the existing level of motorized recreational opportunities plus mitigation projects to protect the environment from existing problem areas, mitigation for past motorized closure cumulative effects, and enhancement for growth.
S-0034-31	Suggestions: a) The public wants the existing roads and trails left open to vehicle use. b) The existing network of roads and trails in the planning area should be considered an inventory with which to develop recreational trail systems. c) The Planning Team should look for management alternatives that provide for mitigation instead of closure. Options other than closure should be emphasized in each alternative. d) Alternatives, or management guidance, directives etc that require closure as the first or only option when resource impacts are identified should be avoided. e) The Planning Team should carefully consider displaced use. Assuming that closures are eminent in some areas, one could calculate approximately how much existing motorized will be displaced to other areas. The Planning Team should develop alternatives that allow for additional access and additional recreational opportunities in suitable areas in order to properly manage the displaced use. f) The Planning Team should avoid overly restrictive management prescriptions that limit the land

	manager's ability to respond to changing recreational patterns.
S-0034-32	<p>A reasonable test of significance of impacts from motorized closures on motorized recreationists must be used. A reasonable test would include evaluation of indicators including:</p> <ol style="list-style-type: none"> 1. Where else can motorized recreationists go within a reasonable distance and with equal recreation value? 2. Do motorized recreationists have an adequate selection of the recreational resources with the proposed motorized closure(s)? 3. What is the balance of recreational opportunities in the area and region as demonstrated by the information developed from the outline shown in Table 3? 4. Are the existing motorized recreational opportunities sufficient for the needs of the public? 5. Are there documented user conflict and can the recreational resources be reasonably shared? Note that it is not reasonable to define user conflict a merely seeing someone else on a trail. 6. What are the cumulative effects of this motorized closure combined with all other motorized closures?
S-0034-33	Mountain bikes and motorcycle use should be considered compatible uses. Both are mechanized and both prefer a single-track or narrow trail.
S-0034-34	If the loss of motorized routes cannot be mitigated within the project area, then a Motorized Access and Recreation Mitigation Bank must be established. This mitigation bank would keep an overall accounting of the miles and acres of motorized access and recreational opportunities closed and the new motorized access and recreational opportunities created to offset that loss.
S-0034-35	The evaluation needs to distinguish the difference in trail requirements and impacts between atvs and motorcycles and use that difference to justify keeping more single track trails open to motorcycles.
S-0034-36	A fair travel management process would start with a comprehensive inventory of all existing motorized routes in use by the public.
S-0034-37	Oftentimes, many of the motorized roads and trails proposed for closure are primitive roads and trails that provide the ideal experience sought by motorized visitors. We request that the analysis adequately evaluate the type and quality of experiences that motorized visitors enjoy and want maintained in the area.
S-0034-39	If a private property owner closes a historic motorized access or route to public land through their property, then in order to be fair, to avoid special privileges; the public routes should be closed at the private property line to all motorized use and, where the route has access from the other end on public land, it should remain open so that it can provide an out and back motorized opportunity.
S-0034-41	Many handicapped, elderly, or physically impaired citizens can only access and recreate on public lands by using motorized roads and trails. The needs of these citizens should be adequately considered.
S-0034-43	We request evaluation of the loss of opportunities for off-highway vehicles due to the lack of a continuous system of roads and trails on which off-highway vehicles can be legally ridden and the formulation of a preferred alternative to address that issue. In areas where OHVs must use a roadway, we request that a reasonable travel management alternative be developed that includes the designation of a reasonable network of dual-use roads to allow inter-connection access to OHV recreational resources.
S-0034-44	We are concerned about the preservation of historic mines, cabins, settlements, railroads, access routes and other features used by pioneers, homesteaders, loggers, settlers, and miners. These are important cultural resources and should not be removed from the landscape. We request that the ties to the land that are part of our local western culture and heritage be protected and that the preferred travel management alternative include opportunities to visit these features as part of motorized interpretative spur destinations and loops.
S-0034-46	In addition to the education initiative discussed above, we also request that the agency undertake a special management initiative that would evaluate areas where the public is not following the designated system of routes.
S-0034-47	We request that the analysis and decision-making avoid restricting motorized access and recreation opportunities to narrow corridors along major roads.

S-0034-48	Existing timber sale roads and trails should be inter-connected by construction of new trail segments or rehabilitation of existing trail segments to provide mitigation for lost motorized recreation opportunities. Connector trails should be constructed to avoid dead-end trails.
S-0034-49	Where possible, agencies are encouraged to provide trailheads for motorized trails that are convenient to urban areas.
S-0034-50	Every public access closure through private land should be challenged and protected by asserting legal right-of-ways.
S-0034-51	Provide open or play areas for motorized recreation opportunity and trials bikes where acceptable in selected areas.
S-0034-52	Motorcycle trail riders enjoy riding single-track trails. Motorized single-track recreation trails are limited at this time and continue to decline. Some BLM and FS districts do not differentiate between ATV and motorcycle trails in their travel plans. Evaluations and travel plans should differentiate between ATV and motorcycle trails.
S-0034-53	The integrity of the "loop" trail system should be maintained. Loop systems minimize the number of on-trail encounters because non-motorized trail users don't encounter motorized users going both directions, as they do on non-loop trails. Loop trails also offer trail users a more desirable recreational experience. Agencies are encouraged to provide opportunity for "motorized loop trail systems" to lessen impacts and to provide a better recreational experience. Spurs are useful for exploration and reaching destinations.
S-0034-54	Agencies are encouraged to avoid yearlong trail closures if wildlife concerns are valid only during certain seasons. In these instances, closures should be seasonal only with the dates consistent with the requirements to protect wildlife.
S-0034-55	Agencies are encouraged to avoid trail closures associated with other actions including timber sales, mining, and livestock grazing. Corrective action should be taken where trail closures in the past have resulted from these sorts of past actions. Loss of motorized trails because of past timber sales should be mitigated by connecting old and new travelways to create looped trail systems.
S-0034-56	There needs to be better coordination between adjoining National Forest and BLM lands when making maps, laying out trails, and establishing travel plans. In some cases a trail is open in one jurisdiction but becomes closed when it crosses over the boundary to another jurisdiction resulting in an overall loss of motorized recreation opportunity.
S-0034-57	Agencies should not use motorized access in areas closed to motorized access by the public because: (a) the public will see the tracks and could become upset that the motorized closure is being violated and/or (b) the public will see the tracks and conclude that motorized access is acceptable.
S-0043-06	The RMP must prioritize travel management planning on all BLM acres in the Lewistown RMP. Motorized travel can adversely fragment habitat, adversely affect wildlife security, can force wildlife to move to private lands, can spread noxious weeds, and can change hunting opportunities. Game retrieval provisions, if allowed, must be sensitive to facilitation off road travel and creation of new routes, the intent of ROS designation as well as big game disturbance.
S-0043-07	<p>Use Recreational Opportunity Spectrum. We request the RMP utilize the ROS system to address balance of recreational opportunities. We request allocations which assure primitive and semi-primitive classes are well represented across the area.</p> <ol style="list-style-type: none"> 1) Acquisition of Access to landlocked parcels. Acquiring public access to the boundaries of large BLM holdings where no such access currently exists must become the top travel priority for BLM management. 2) Proceed with no land exchange transactions that will negatively impact future public access to hunting and fishing opportunities in the area of the proposed exchange. Coordinate with FWP in evaluating wildlife management outcomes of completed exchanges. 3) Identify parcels without legal public access and direct efforts to improve legal public access. 4) Prohibit hunting outfitting on BLM lands where the general public does not have legal access.

S-0050-02	Collar Gulch should be opened back up for vehicular public access by opening the gate. The difficult decent and poor road in itself will limit the type and amount of traffic. It seems that the fish have been well protected and after 20 years of the access being closed it should once again be available to members of the public who are not capable of hiking in by way of the Camp Maiden road or the Collar Gulch Trail system. The gulch was a favorite place for many people for many years.
S-0051-06	Keep existing roads and access used by permittees for operation maintenance.
S-0052-02	Prior to designating SRMAs and ERMAs that contain adjoining private land, the private landowner should be consulted. An agreement should be developed that describes the roles and responsibilities for management of the area - these should include responsibility for trash cleanup, the spread of noxious weeds, the degradation of vegetation, and the maintenance of roadways because of the area being used for recreation. As co-owner of the Vogel Dam, the Brady Ranch is concerned about the problems created by the reservoir being a public recreation site. The Ranch was not consulted prior to the area becoming a designated recreation area and has not been consulted about the stocking of fish that has been taking place. Specific problems resulting from high public visitation are driving on the spillway and dam fill - which, according to the BLM engineer, will eventually result in the failure of these structures - blocking access across the dam to the private property, vandalism and ignoring of signage placed by the property owners, driving off roadways, leaving trash, spreading weeds, fire danger, etc. These problems are as detrimental to the BLM managed property as the private property. These issues need to be addressed or the fish stocking of the Vogel Reservoir will end.
S-0052-03	As a private property owner and a BLM grazing permittee, the use of 2-track trails and any semblance of a trail by OHV users is concerning. Many OHV users drive on anything that resembles a trail and the result is damage to vegetation and it also leads to trespass onto private property.
S-0054-01	We recommend the adoption of the following measures, which are proposed for adoption in the Preferred Alternative of other BLM plan revisions or sage grouse amendments. Some of these are similar to the provisions of Alternatives B and/or C. Limit OHV use to designated roads and trails; limit to existing roads and trails pending designation in the context of a 5-year travel planning effort (North Dakota RMP Amendment, Bighorn Basin RMP Revision).
S-0054-02	Conduct restoration of roads not designated under travel planning (NW Colorado RMP Amendment).
S-0054-03	Use existing roads, or realignments as described above to access valid existing rights that are not yet developed. If valid existing rights cannot be accessed via existing roads, then build any new road constructed to the absolute minimum standard necessary. Allow no upgrading of existing routes that would change route category (road, primitive road, or trail) or capacity unless the upgrading would have minimal impact on sage-grouse habitat, is necessary for motorist safety, or eliminates the need to construct a new road. (North Dakota RMP Amendment).
S-0054-04	New road construction would be limited to realignments of existing roads, if that realignment has a minimal impact on greater sage-grouse habitat, eliminates the need to construct a new road, or is necessary for public safety. Incorporate BMPs. Existing roads used to access valid existing rights; if unavailable, construct to minimum standard necessary. (HiLine RMP revision, North Dakota RMP Amendment).
S-0054-11	Timing Limitations should apply to surface disturbing and disruptive activities. (Lander RMP revision).
S-0054-31	Conduct restoration of roads, primitive roads and trails not designated in travel management plans. (North Dakota RMP Amendment).
S-0054-34	Allow new routes/realignments during site-specific travel planning if it improves GRS habitat and resource conditions. Allow no upgrading of existing routes that would change route category (road, primitive road, or trail) or capacity unless the upgrading would have minimal impact on sage-grouse habitat, is necessary for motorist safety, or eliminates the need to construct a new road. (North Dakota RMP Amendment).

S-0059-14	<p>Our current understanding is that travel management will be completed within 5 years of the RMP. However, open, closed, and limited ORV zones still exist. We feel that all routes within potential lands with wilderness characteristics should be considered closed until travel management can be completed. Where this is not possible, limit vehicles to existing routes only. As a part of protecting these landscapes, it is important to protect them so that we can keep enjoying them and not just block them off. Therefore, we encourage the BLM to identify and prioritize access to these units and improve access to potential LWCs that are currently limited or unable to access. When there are multiple roads/routes leading to the same destination, the BLM should identify which roads/routes can be closed or limited while allowing access. We ask that that BLM also consider the recreational opportunity spectrum within the planning area and identify areas for semi-primitive, non-motorized recreation and prioritize their protection. Please see Appendix H of the BLM Alaska Ring of Fire Proposed RMP/Final EIS. Even though the plan is not addressing travel management, the BLM has the authority to close problem routes. Since it could be many year before a travel management plan is completed and implemented, we ask that where problem routes are identified through the planning process, that you exercise your authority to management vehicle use, on an interim basis, until a travel management plan adopted to prevent further damage.</p>
S-0059-15	<p>We recommend the following: View the travel planning criteria in the ROD of the Dillon (MT) RMP at http://www.blm.gov/mt/st/en/fo/dillon_field_office/rmp.html as an example of an alternative to completing travel management outside of the initial RMP effort. They include road density targets and an appendix outlining the principles they will use when completing a comprehensive travel management plan.</p> <ul style="list-style-type: none"> · Travel planning should address the recreation and transportation needs of the planning area. · Use the legal definitions of routes and roads when designating routes. · Present baseline travel system responsibly, so that that illegally-created routes are not legitimized. · Please include a detailed closure and restoration schedule in the plan. · Please address the monitoring of road closures and restoration. We sincerely commend the BLM on their current efforts to do this. To our knowledge, the Lewistown field office has the most and best appropriate signage for road closures in the state of Montana.
S-0060-01	<p>Increasing demands for energy and other resources, fragmentation of habitats from new roads, the increasing threat of uncharacteristic wildfires, invasive species, and contentious political debates indicate that a backcountry focused land use planning tool is needed in the Lewistown RMP. This tool should recognize and give attention to important wildlife habitat and valued "backcountry" lands, and be applied with a strong restoration emphasis to address modern management challenges.</p>
S-0061-02	<p>I am very concerned about the amount of off-road vehicle use which seems to be increasing. Areas without roads need to be kept that way and areas with so-called roads, two-tracks, should be examined and many of those two-tracks closed.</p>
S-0062-01	<p>When the timber blow-down occurred in the Limekiln area a few years ago, BLM wanted to build a road to harvest the downed timber. BLM indicated It would close the road once the harvest was completed. A network of roads was constructed. However, I am not aware of any effort so far to reclaim and close the road. In previous planning , this area was to be used primarily for hiking and would be closed to OHVs. I hope you adhere to your previous plans to obliterate the road and keep the area closed to OHVs .</p>
S-0062-05	<p>At the same time, the District Manager stated he did not foresee closing very many roads. I don't have any specific roads to recommend closing, but I would ask that you look seriously at road gradient and potential for soil erosion when considering which roads to leave open. There are a couple of roads in the monument that I can think of that are very steep and never should have been left open (the road down to Hole-in-the-Wall and the Bullwhacker Road where it drops down to the river). Roads such as these are dangerous and are highly susceptible to erosion. OHV on some other roads contributes to the spread of noxious weeds.</p>

S-0064-01	<p>MMBA wishes for this BLM planning effort to identify areas near small towns that hold future potential for non-motorized recreational trails. These areas ideally should be within 20 miles or less to communities with schools, homes, stores, or other facilities. we have identified two areas.</p> <p>Near Lewistown, on BLM lands in the Judith Mountains, exists the Limekiln Trail. But the town could use and enjoy more miles of trail. Trails that reach out northward along this island range, and trails that form loops that reduce driving requirements should be a future goal. Eventually every trail built will be a valued community resource. Lewistown is a large enough town to need several more trails, each providing a different experience.</p> <p>Near Winnett, on BLM lands from Cat Creek north to Blood Creek, a singletrack trail could become a legacy and valued resource for area residents. From a trailhead near Cat Creek, singletrack trail could wind along through the hills and coulees above the Musselshell River. Not all of the BLM land is contiguous, but the Lower River Road ties everything together. Ideally a trail in this area could be used not only for bicycling, but for horse riding, cross-country running, and hiking as well. A trail could be formed by planning and building several loops, eventually tying them together by easements. It remains to be seen if the people of Winnett would accept this concept, but the first step would be to identify this location as a potential recreational resource. Certainly if a trail was eventually constructed and enjoyed, Winnett would collect benefits that accompany recreational trails, including better health, recreational choice, and a new source of economic diversity. Ideally every small community should have trails for residents to enjoy. While it's not the duty for the BLM to provide for all small Montana towns, we think these are two important recreational locations in the Lewistown planning area that must be identified in the RMP.</p>
S-0066-02	2nd issue is the chronic traveling off-road on highly erodible soils, and needing to go as far as to look at Administrative Off-Road Travel Policy on highly erodible soils, especially when it is wet and muddy!
S-0068-01	"Issues for this parcel: ORV use, erosion of former logging roads, noxious weeds, conflicts with bears and subdivision development to the south (Elk Meadows)" Comment noted on map of the planning area at a public scoping meeting; BLM parcel close or adjacent to Highway 200 approximately 6 miles south of Dearborn River.
S-0069-02	We need to keep the roads that are presently used, especially for fighting fires.
S-0071-01	I am writing to request that any revisions to the travel plan include as much acreage and access for OHVs as possible. Public lands are just that - public - and they should be maintained for the use and enjoyment of EVERYONE, not just the people who oppose resource development, OHVs, horses, bicycles, cows and ever other conceivable use except walking in tennis shoes. "Saving public" land doesn't mean eliminating all other types of uses on the land otherwise there is nothing we are saving the lands for. Keep access open for all users on PUBLIC lands.
S-0074-04 (DUPLICATE)	Identify sites where off-road vehicles have scarred land, have spread noxious weeds, and have created user conflicts and take immediate steps, even if only a holding action, to keep those problems from getting worse, until they can be properly addressed in the travel management plan.

VEGETATIVE COMMUNITIES (VC)

COMMENT NUMBER	COMMENTS RELATED TO VEGETATIVE COMMUNITIES (VC)
S-0003-06	You should do a complete inventory of noxious weed problems and then take effective steps to control the issue. Where off road vehicles have scarred the land and intensified the spread of weeds please put some effective controls on motor vehicles. Restrict motor vehicles to designated roads only. Please leave in place only the road network that provides basic transportation. The less roads you keep the wilder and more natural the landscape will be.
S-0004-03 (DUPLICATE)	Identify areas and waterways with wildlife or wildland values that are not fulfilling their potential because of noxious weeds, past commercial activities or ground disturbances that could be restored.

S-0007-01	In general, I am strongly interested in and concerned about preserving the wildland characteristics of approximately 650,000 acres of public BLM wildlands in central Montana prairies as well as forestlands and especially riparian areas.
S-0007-02	Having canoed the Missouri River numerous times since 1979, I am concerned about cottonwood regeneration, invasion of noxious weeds, loss of solitude and quiet, destruction of riparian habitat by motorized travel, (air, land and water) and livestock use.
S-0007-03	The new Resource Management Plan must protect resources first and BLM must be bold in barring uses that threaten native vegetation and critical wildlife habitat. Extractive uses such as mining, timber and grazing as well as motorized recreation must take second place when it coming to managing BLM lands in central MT.
S-0009-02 (DUPLICATE)	In order to support the future of public lands hunting and fishing, I ask that you adopt backcountry conservation areas within the Lewistown RMP to conserve sizeable tracts of lands that are generally intact and undeveloped, and that provide highly-functioning fish and wildlife habitat and dispersed hunting and fishing opportunities. When adopted, backcountry conservation areas should conserve intact and undeveloped BLM lands, prioritize management activities that restore habitats and control noxious weeds, sustain important public access to public lands, and maintain traditional uses of the land that are important to rural communities.
S-0036-01	<p>Emphasize and conduct wilderness inventories on all BLM lands 5000 acres or greater to assess naturalness, opportunities for solitude, opportunities for primitive recreation, and supplemental values such as wildlife, historic and cultural sites, and geologic features in accordance with most recent BLM wilderness guidelines. This should include identification of areas and waterways with wildlife or wildland values that are not fulfilled to their true potential due to noxious weeds, past commercial activities, vandalism, or ground disturbances and that could be restored. Special attention should be given to lands near existing wildlife refuges or protected areas and critical wildlife habitat.</p> <ul style="list-style-type: none"> • Access to undisturbed and primitive environments helps children and citizen scientists gain interest in and understanding of science, biology, geology, ecology, environment, natural history, and ancient civilizations.
S-0043-01	Protection and restoration of woody draws. These relatively uncommon plant community features are disproportionately used by wintering big game and are essential as wintering sharptail grouse habitat. Livestock grazing has led to reduction of this habitat feature or its health on the RMP landscapes. Plant components of this feature are in poor vigor and often lack sufficient regeneration. The RMP must resolve how this important vegetative component will be protected and restored.
S-0043-02	Protection and restoration of riparian areas. These plant communities are disproportionately grazed by livestock and are often dramatically altered negatively as wildlife habitat. Most of the RMP hunted species depend substantially on riparian areas as habitat. Riparian areas comprise minor percentages of the RMP but are among the most abused from livestock grazing. The RMP must protect and restore all riparian areas. The RMP must resolve adverse effects of disproportionately heavy grazing occurring and the effects of that grazing on riparian vegetative health and vigor.
S-0043-03	Manage for vegetative health and diversity on upland sites. Cattle grazing systems are commonly developed to, under the best of management, to improve the conditions of grasses as opposed to shrubs and forbs. The effect of these grass-oriented grazing systems is the reduction of shrubs and forbs important to wildlife as forage, cover, and nesting cover. Residual plant cover assures insect production and diversity as critical gamebird brood food source. We request the RMP address upland vegetative diversity and health through direction for grazing plan designs, monitoring and inventories.

S-0043-04	Ensure grazing and other uses do not facilitate noxious weed spread. Long term vegetative health and wildlife habitat is dependent on native plants that are dramatically adversely affected by invasions of noxious weeds. The RMP must prioritize vegetative health and preventing noxious weed spread higher than any other use that might facilitate noxious weed spread, including incompatible grazing and other surface disturbances such as road construction, oil and gas development, and native plant conversions .
S-0043-05	Protection of all sagebrush communities. All sagebrush plant communities must have priority for protection. Any land uses must not further fragment, alter or lessen vigor and reproduction of sage communities. No uses should be permitted that contribute to fragmentation of sage communities.
S-0044-01	<p>While a portion of the federal minerals along the Front have been withdrawn by congressional action, some federal minerals were not subject to that withdrawal. Significant investment has been made by the US Fish and Wildlife Service, Montana Fish Wildlife and Parks, The Nature Conservancy, The Conservation Fund, other private land trusts, and numerous private landowners to protect lands on the Rocky Mountain Front for conservation purposes. More than 225,000 acres of private lands have been protected on the Front to date, through fee acquisitions or conservation easements. Some of these protected lands are underlain with federal minerals not subject to the congressional mineral withdrawal.</p> <p>These fee and conservation easement interests were acquired to protect the important biological values of these lands. These values include intact native plant grassland, wetland, riparian, and forest communities; habitat for numerous plant species of concern; and habitat for numerous wildlife species of concern such as grizzly bear, short-horned lizards, Sprague's pipit, and numerous other grassland, wetland, and forest bird species. These intact native communities and species of concern should be considered in the analysis of any leasing decisions or stipulations, and should receive special consideration and protective stipulations, especially on lands protected for conservation purposes</p> <p>Beyond the habitat values of any specific tract, intact habitats on these lands contribute to the larger scale habitat requirements and travel routes required for species with large home ranges, including grizzly bears and ungulates such as antelope, elk, and mule deer. Mineral development could significantly fragment existing large blocks of native habitats. Cumulative effects and impacts of mineral activities at these larger scales should be addressed in the RMP as well.</p>
S-0043-10	<p>We ask that you identify areas of lands that are generally intact and undeveloped and that provide high quality fish and wildlife habitat. We ask that you allocate or designate these lands as "backcountry conservation areas" (BCAs) to conserve unfragmented fish and wildlife habitat and dispersed hunting and fishing opportunities. The following provides specific examples of the appropriate allocations or management approaches that should be applied in the Lewistown RMP when adopting BCAs.</p> <p>BCA Resource Decisions:</p> <p>Establish objectives for management activities that conserve, restore, maintain and enhance fish and wildlife habitat, control and manage noxious weeds, and restore forests and rangelands.</p>
S-0044-02	As a whole, the Rocky Mountain Front is largely free of noxious weeds. Weed management and prevention on the Front has been a priority for numerous private and public landowners, and other agencies for many years. The potential for the introduction or spread of invasive weeds as a result of mineral activities should also be considered in the RMP, and special stipulations should be developed to address invasive species.

S-0044-03	<p>Of special note is The Nature Conservancy's Pine Butte Swamp Preserve, portions of which are underlain by federal minerals. Peat wetlands at Pine Butte support significant populations of 13 plant species of concern including <i>Braya humilis</i>, <i>Gentianopsis macounii</i>, <i>Primula incana</i>, <i>Salix serissima</i>, <i>Carex craweii</i>, <i>Eleocharis rostellata</i>, <i>Juncus acuminatus</i>, <i>Kobresia simpliciuscula</i>, <i>Trichophorum cespitosum</i>, <i>Trichophorum pumilum</i>, <i>Cinclidium stygium</i>, <i>Meesia triquetra</i>, and <i>Scorpidum scorpioides</i>. These wetlands at Pine Butte are likely the largest peatland complex in Montana. These wetlands were recently recognized by the Montana Native Plant Society as part of its Important Plant Areas Program (http://www.mtnativeplants.org/Important%20Plant%20Areas). Maintenance and protection of surface and sub-surface hydrology in and around the wetlands is crucial for maintenance of the wetland complex. These wetlands also provide critical habitat for many wildlife species, most notably the security and feeding habitat for grizzly bears. Given these significant values we believe this area should receive the highest protections possible, preferably closure to leasing or at minimum no surface occupancy.</p>
S-0044-05	<p>The Nature Conservancy is concerned that federal mineral leasing and development could have significant impacts to the surface and conservation values that have been protected on the Rocky Mountain Front. The lands on the Front contain numerous wildlife, vegetation, hydrologic, cultural and large scale habitat values that require special consideration. Decisions regarding federal minerals on the Front should offer the highest protections possible for these special values, including special protective stipulations, no surface occupancy, or closure to leasing, especially on lands where the surface has been protected for conservation purposes.</p>
S-0045-01	<p>The Montana Native Plant Society's Important Plant Areas (IPA) Program identifies the most important sites for plant conservation across Montana using consistent criteria. An IPA supports an exceptional population of one or more globally rare plants or an exceptional assemblage of plants rare or threatened in Montana. The Lewistown RMP Planning area includes the Pine Butte Peatlands IPA in west-central Teton County. The Pine Butte Peatlands provide habitat for 13 species of concern considered rare in Montana, including <i>Braya humilis</i>, <i>Gentianopsis macounii</i>, <i>Primula incana</i>, <i>Salix serissima</i>, <i>Carex craweii</i>, <i>Eleocharis rostellata</i>, <i>Juncus acuminatus</i>, <i>Kobresia simpliciuscula</i>, <i>Trichophorum cespitosum</i>, <i>Trichophorum pumilum</i>, <i>Cinclidium stygium</i>, <i>Meesia triquetra</i>, and <i>Scorpidum scorpioides</i>. Many of these populations are very large. The Pine Butte Peatlands are possibly the largest peatland complex in Montana. A copy of the Pine Butte Peatlands IPA nomination is enclosed.</p> <p>The Pine Butte Peatlands are fed primarily by sub-surface water from the Teton River moving through intervening alluvial deposits. Maintenance of the functional hydrologic system from the Teton River watershed to the Teton River and surrounding substrates is crucial to the existence of the Pine Butte Peatlands. One potential threat to the Pine Butte Peatlands is oil and gas development. Oil and gas development could directly destroy habitat, disrupt hydrology, or alter and degrade water quality. While there is no BLM surface ownership within the IPA, portions of the IPA are underlain with federally owned minerals. The federal minerals in T24N R8W are subject to a congressional mineral withdrawal, but those in T24N R7W are not. Any decisions regarding federal minerals under the peatlands or in surrounding areas that may affect the peatland hydrology should offer the highest possible protections for these lands, either closure to leasing or no surface occupancy stipulations.</p>
S-0049-32	<p>In addition, since the planning area is susceptible to periods of drought, we recommend the RMP/EIS include a list of potential grazing strategies for use during periodic droughts that will maintain vegetation and aquatic resources in their desired conditions.</p>
S-0049-33	<p>The NOI indicates that the RMP/EIS process will incorporate BLM's Standards for Rangeland Health and Guidelines for Livestock Grazing Management. We recommend the RMP/EIS include discussion of monitoring requirements that will be applied at the project level to ensure that these standards and guidelines are being met. An explanation would be helpful regarding how the Annual Operating Instructions will ensure compliance with project level monitoring requirements for parameters such as water quality.</p> <p>To help evaluate and adjust grazing management strategies, the EPA also recommends that the RMP/EIS include a monitoring section that describes how monitoring will be implemented on an allotment level and at the watershed or sub-watershed level to determine rangeland condition</p>

	(including water quality) status and trends.
S-0050-03	A historic landmark is located near the mouth of Maiden Canyon. This is a large limestone outcrop that resembles an elephants head and trunk and is know as "the Elephants Head" dating back many years. This unique feature can barely be seen now because of tree growth. Enough trees could be removed to one again expose the Elephants Head for the public's enjoyment. Possibly the trees could be designated/marked and then harvested by fire wood gathers.
S-0050-04	The Maiden Forestry project took off a number of years ago under the experienced leadership of BLM Forester, Bruce Reed. The quality of work that was done on the slopes of Maiden Peak and around Camp Maiden was very good and certainly reduced wildfire fuel loads. The project fell dormant due to the necessary remediation of the Lime Kiln Canyon blow-down event. The Maiden Forestry project should be rejuvenated and move forward both for wildfire fuel reduction, public safety in the event of a wildfire, and good forestry stewardship. I was involved with the project and would lend my assistance again. Spotted Knapp weed flourishes in places along the Judith Peak Road and on Big Grassy Peak. Can this be better addressed in the future?
S-0051-01	<ul style="list-style-type: none"> • Manage conifer encroachment to improve range biodiversity and help control wild fire. • Sage brush management is needed at times when it becomes a monoculture and crowds out native range biodiversity. • Manage vegetation with continued livestock grazing which improves habitat for sage grouse, reduces fire fuel load, and keeps viable ranches in operation. Viable ranches keep open space available for wildlife, and provide a stable economic base in small communities. • Use available scientific and local monitoring data along with "on the ground" common sense information when making decisions on riparian health, landscapes, and resources.
S-0051-02	<ul style="list-style-type: none"> • Work diligently with permittees to not only identify and map invasive species, but get on the ground with control efforts using BMP's and whatever works for each individual situation. • Get more awareness and help from the public sector. With more traffic, hunting, general sight seeing, etc, they need to contribute to the weed issues with possibly vehicle washing and becoming informed and knowledgeable of how weeds are spread and what to look for.
S-0051-07	<ul style="list-style-type: none"> • Manage confer encroachment in some areas to preserve open habitat and native range diversity for both livestock grazing and wildlife. • Work in conjunction with other landowners and agencies for desired management.
S-0051-09	<ul style="list-style-type: none"> • Consider whether prescribed burns have been successful. An example would be in the Tin Can Hill area. Was enough accomplished for the money spent?
S-0051-10	<ul style="list-style-type: none"> • Maintain livestock stocking rates to benefit viable ranching operations, local economy, wildlife, and fire management.
S-0051-11	<ul style="list-style-type: none"> • Work with permittees to eliminate or control crested wheat grass in areas where native range grasses would better benefit livestock and wildlife. • Consider working with permittees to add watering facilities that could possibly eliminate the need for stock ponds which sometimes sour the ground below them. • Work with permittees to add flexibility to grazing plans which could add diversity and management options benefiting both the operation and the resource.
S-0052-01	A more comprehensive partnership approach to combating noxious weeds is necessary. Working with county weed districts and other state and federal agencies to bring a unified effort will be more productive. Consideration of check points and washing stations for recreation vehicles might help to stop the spread of weeds from outside areas.
S-0052-02	Issue: Recreation and Visitor Services Prior to designating SRMAs and ERMAs that contain adjoining private land, the private landowner should be consulted. An agreement should be developed that describes the roles and responsibilities for management of the area - these should include responsibility for trash cleanup, the spread of noxious weeds, the degradation of vegetation, and the maintenance of roadways because of the area being used for recreation
S-0052-03	As a private property owner and a BLM grazing permittee, the use of 2-track trails and any semblance of a trail by OHV users is concerning. Many OHV users drive on anything that resembles a trail and the result is damage to vegetation and it also leads to trespass onto private property.

S-0053-01	As one of MFWP's area wildlife biologists within the area covered by the Lewistown RMP, one of the issues that I feel needs to be addressed in the RMP is dealing with conifer/juniper encroachment or invasion into areas of big sagebrush habitat, particularly in areas of occupied or potential sage grouse habitat.
S-0054-17	Employ herd management to minimize livestock impacts on sage grouse nesting habitat during spring. Hot season grazing does not occur on an annual basis. Adjust AUMs where sage grouse habitat objectives are not being met. Incorporate terms and conditions into grazing permits to meet sage grouse habitat objectives. (California-Nevada RMP Amendment).
S-0054-18	Incorporate sage grouse habitat objectives into permit renewals. Manage toward ecological site potential and toward reference state to achieve sage grouse objectives. (NW Colorado RMP Amendment).
S-0054-21	Grazing allotments not meeting rangeland health standards and not making progress toward this goal will be closed. (Miles City RMP revision).
S-0054-22	Develop specific objectives to conserve, enhance or restore PH based on ESDs and assessments. Implement management actions (grazing decisions, AMP/Conservation Plan development, or other plans or agreements) to modify grazing management to meet seasonal sage-grouse habitat requirements. (North Dakota RMP Amendment).
S-0054-23	Where riparian and wetland areas are already meeting standards they would be maintained in that condition or better. Where a site's capability is less than PFC, BLM would manage to achieve or move toward capability. Manage wet meadows to maintain a component of perennial forbs with diverse species richness relative to site potential (e.g., reference state) to facilitate brood rearing. Where riparian areas and wet meadows meet PFC, strive to move towards GRSG habitat objectives within capabilities of the reference state vegetation relative to the ESD. (North Dakota RMP Amendment).
S-0054-24	Do not allow vegetation treatments with a potential to adversely affect sage grouse. Retain a minimum of 70% of ecological sites capable of supporting 12% cover in Wyoming big sage or 15% cover in mountain big sage. Manage a total disturbance cap of less than 30% lands not meeting these criteria. (NW Colorado RMP Amendment).
S-0054-25	Evaluate role of existing seedings composed of introduced perennial grasses in and adjacent to Priority Habitat to determine if they should be restored to sagebrush or habitat of higher quality for sage grouse. If these seedings are part of an AMP/ Conservation Plan or if they provide value in conserving or enhancing the rest of the Priority Habitat, then no restoration would be necessary. (North Dakota RMP Amendment).
S-0054-26	Do not use fire in precipitation zones < 12", except as last resort and where conditions allow and cheatgrass is a very minor component. (NW Colorado RMP Amendment).
S-0054-27	Rest grazing allotments 3 full years following fire; utilize grazing exclosures for monitoring; grazing excluded until woody and herbaceous plants achieve SG objectives. (Bighorn Basin RMP Revision).
S-0054-40	Do not use fire in precipitation zones < 12", except as last resort and where conditions allow and cheatgrass is a very minor component. (Northwest Colorado RMP Amendment).
S-0057-01	<p>A habitat of special note that should be considered in the RMP is the low elevation limber pine savanna at the mountain/grassland interface along the Rocky Mountain Front. These limber pine stands provide important habitat for grizzly bears, big game winter range, and numerous bird species of concern. Many of these limber pine stands also contain significant old growth, which developed under the influence of both fire and large ungulate grazing. I have attached a report on the fire history in limber pine communities from Pine Butte Preserve that may be useful for your analysis.</p> <p>The unique values of these limber pine communities should be considered when developing management guidelines and direction in the RMP. BLM lands that support limber pine stands include the existing ONAs on the Front, BLM lands along Birch Creek, and BLM lands north of the Sun River and west of Tunnel Lake. In my experience, the limber pine stands west of Tunnel Lake are particularly notable for their relatively open character and extensive old growth component.</p>

S-0058-04	We would urge BLM to consider wildlife corridors, wilderness inventories and other data when creating management plans for the Monument area (ie the Lewistown Field Office). Please consider using the Rapid Ecoregional Assessment for the Northwestern Plains (whenever it's released) to inform yourselves where the important linkages are and to protect these lands appropriately.
S-0060-01	Increasing demands for energy and other resources, fragmentation of habitats from new roads, the increasing threat of uncharacteristic wildfires, invasive species, and contentious political debates indicate that a backcountry focused land use planning tool is needed in the Lewistown RMP. This tool should recognize and give attention to important wildlife habitat and valued "backcountry" lands, and be applied with a strong restoration emphasis to address modern management challenges.
S-0062-05	At the same time, the District Manager stated he did not foresee closing very many roads. I don't have any specific roads to recommend closing, but I would ask that you look seriously at road gradient and potential for soil erosion when considering which roads to leave open. There are a couple of roads in the monument that I can think of that are very steep and never should have been left open (the road down to Hole-in-the-Wall and the Bullwhacker Road where it drops down to the river). Roads such as these are dangerous and are highly susceptible to erosion. OHV on some other roads contributes to the spread of noxious weeds.
S-0065-04	Give special consideration to areas that have been previously disturbed and can be restored to their full potential as recreational and multi-use sites. Public lands with high levels of disturbances are not able to be used to their full potential. Creating a plan for noxious weed and erosion management will allow these places to be put to full use, which will improve the sites for future generations.
S-0068-01	"Issues for this parcel: ORV use, erosion of former logging roads, noxious weeds, conflicts with bears and subdivision development to the south (Elk Meadows)" Comment noted on map of the planning area at a public scoping meeting; BLM parcel close or adjacent to Highway 200 approximately 6 miles south of Dearborn River.
S-0072-02	Maintaining and improving wildlife habitat and restoring degraded range conditions should be reflected in the purpose and need for the LRMP in compliance with both the Taylor Grazing Act of 1934, the Federal Lands Policy Management Act (FLPMA) of 1976, and other laws that govern livestock management on public lands.
S-0072-03	Thus, the reason for addressing livestock grazing in the LRMP is to improve the range condition of the allotments within the project area and to maintain and improve wildlife habitat. This direction, based on laws and regulations, should be explicitly stated in the "Purpose and Need for the Plan" in the DEIS. Furthermore, the selection of any alternative in the DEIS that does not provide direction for meeting those goals violates the intent of the laws and regulations that govern public land management.
S-0072-04	The purpose and need section of the DEIS should include the need to conserve all wildlife habitat and restoration of degraded range conditions as a purpose of the document.

S-0072-05	<p>In the Anticipated Planning Issues Management Concerns document provided with the scoping notice, the BLM offers the following in regard to livestock grazing:</p> <p>Preliminary Planning Considerations</p> <ul style="list-style-type: none"> ➤ Conform with existing laws, regulations, and BLM policy pertaining to livestock grazing on public lands ➤ Incorporate Montana Standards for Rangeland Health and Guidelines for Livestock Grazing Management ➤ Consider ecological site inventory information ➤ Protect important biological resource functions that provide for soil stability, water quality, and healthy riparian and upland vegetation communities ➤ Provide for the protection and restoration of native species and potential natural communities ➤ Authorize use to minimize environmental impacts under the principles of multiple use and sustained yield. <p>The LRMP must specifically address how these goals will be achieved. For example, Guideline #1 of the Montana Standards for Rangeland Health and Guidelines for Livestock Grazing Management provides that “[g]razing will be managed in a manner that will maintain the proper balance between soils, water, and vegetation over time.” While such guidelines articulate important goals, those goals will not be achieved without requiring that land managers meet quantitatively measurable terms and conditions. The LRMP must provide clear, quantitative terms and conditions to guarantee compliance with those guidelines.</p>
S-0072-06	<p>In regards to livestock grazing generally, Western Watersheds Project urges the BLM to incorporate the following in the LRMP:</p> <p>Specific measurable terms and conditions for livestock grazing in riparian areas, uplands, and wildlife and fisheries habitat, including:</p> <ul style="list-style-type: none"> (i) a minimum of 7” stubble height remaining on hydric soils riparian greenlines after livestock grazing (ii) a 10% maximum annual bank or wetland alteration from all sources for streams and wetland hydric and mesic soil areas of upland seeps, springs, wet meadows and aspen clones (iii) a maximum annual woody browse utilization by all browsing ungulates of 15% on cottonwood, aspen, woody shrub, and willows (iv) a maximum annual grazing utilization of perennial grass species on upland landscapes by all grazer of 35% (v) a minimum 9” residual perennial native grass cover for ground-nesting birds like sage-grouse and sharp-tailed grouse.
S-0072-07	<p>The LRMP must identify how suitability determinations have been made for each of the allotment whether it is currently authorized for grazing or unallocated. Any allotments that do not meet the criteria described in Guideline #3 must be reevaluated. Unfortunately, according to the Anticipated Planning Issues Management Concerns document, it appears the BLM only intends to review currently unallocated parcels.</p>
S-0072-08	<p>The BLM must scientifically and accurately determine those lands which are capable and suitable for livestock grazing. The BLM must also accurately and quantitatively determine how much forage (i.e. forage capacity) is currently available. Additionally, the BLM must properly allocate that forage to watershed and stream protection, wildlife habitat and food, then to livestock if available.</p>
S-0072-09	<p>As the BLM must certainly acknowledge, the quality of the land in the project area is severely diminished. Thus, when the LRMP seeks to improve range condition, as it must, what this really means is that the LRMP must provide for improved riparian, upland, and wildlife habitat conditions and include goals, terms and conditions, and standards to achieve those goals.</p>

S-0072-10	The correction of resource degradation caused by domestic livestock and the prevention of future degradation should be driving forces behind the LRMP and should be reflected throughout the NEPA document and in any future agency decisions regarding domestic livestock grazing in the project area. The Alternatives in the DEIS must set specific livestock grazing levels that will be used to meet standards.
S-0072-11	Simply stating that specific standards will be developed at the site specific level violates law and allows the BLM to continue the degradation caused by domestic livestock. The BLM must establish allowable use levels as required by both 43 CFR Sec 4100.0-8 and 43 CFR 1601.0-5(b) by including maximum livestock utilization standards in the LRMP.
S-0072-12	The BLM must define what constitutes a sustainable level of livestock grazing. "Sustainability" is defined in the glossary as "[t]he ability of an ecosystem to maintain ecological processes and functions, biological diversity, and productivity over time." The DEIS must explain how it meets this definition of sustainability.
S-0072-13	The LRMP should provide for long-term rest to facilitate recovery. Any discussion of impacts should address the use of peer-reviewed range science principles for management and rely on high standards of performance. The reliance on unfounded solutions such as time-controlled grazing are not adequate for recovery.
S-0072-14	The most effective way to protect and restore lands in the planning area would be the elimination of cattle from the landscape, and allow limited the amount of browsing in the area to that by wildlife. Stating that stricter standards will improve range in declining condition is not only a failure to disclose impacts, but it ignores the real problem. In numerous studies of riparian grazing impacts, investigators concluded that total removal of livestock was necessary to restore ecosystem health.
S-0072-15	Weighing the impacts of resource management practices is consistent with the BLM's mission of providing lands for multiple uses as recognized in the Multiple Use Sustained Yield Act. The "multiple use" concept as defined in law and regulations requires "a reasoned and informed decision that the benefits of grazing ... outweigh the costs" and a weighing of "the relative values of the resources." Therefore, the BLM must show that the benefits of domestic livestock grazing outweigh the costs.
S-0072-16	In spite of the evidence of widespread loss of plant productivity and ground cover, accelerated erosion and BLM's own documentation of rapid declines in species such as sage-grouse, BLM routinely chooses not to address livestock impacts in any scientific or sustainable fashion. The LRMP must acknowledge the negative impacts of livestock grazing and propose significant grazing reductions to address these impacts.
S-0072-17	Based on 43 CFR 4180, appropriate actions to address the negative impacts of domestic livestock are to be implemented that will result in significant progress toward attainment of the standards no later than the start of the next grazing season. Clearly this has not been accomplished. Given the fact that the number of cows that could be grazed on BLM land in the planning area represents a slight and declining economic influence, this degradation is unacceptable.
S-0072-18	Furthermore, Bock et al. ²⁶ reviewed the effect of grazing on Neotropical migratory landbirds in three ecosystem types, and found an increasingly negative effect on abundances of bird species in grassland, riparian woodland, and Intermountain shrubsteppe (almost equal numbers of species with positive and negative responses to grazing in grassland; six times as many with negative as positive responses in shrubsteppe), but impacts to these species are lacking in the DEIS.

S-0072-19	<p>Since sagebrush communities on private lands have been converted to agricultural or other uses or are not being managed in a manner compatible with sagebrush dependent wildlife, the importance of maintaining the integrity of sagebrush habitats on BLM lands within the planning area to provide taller, denser stands for mule deer, pronghorn, and sage-grouse is extremely important. For example, big sagebrush canopy cover values on undisturbed relicts and kipukas does not support the assertions by the BLM that big sagebrush canopy cover increases due to livestock grazing. In fact, the just cited researchers found the following:</p> <ul style="list-style-type: none"> · Big sagebrush canopy cover was higher inside grazing exclosures and was decreased outside exclosures, · Perennial grasses and sagebrush canopy cover were significantly higher in ungrazed vs. grazed plots, · After grazing had been removed big sagebrush canopy cover and grass cover increased significantly.
S-0072-20	<p>Anderson and Inouye found that contemporary state-and-transition models do not fit the sagebrush ecosystem because viable remnant populations of native grasses and forbs are able to take advantage of improved growing conditions when livestock are removed. They found further that despite depauperate and homogenous conditions of permanent plots in 1950, after 45 years vegetation had been anything but static, clearly refuting claims of long-term stability under shrub dominance. Mean richness per plot of ALL growth forms increased steadily in the absence of domestic livestock grazing. Grasses and forbs increased significantly. Given these findings, perhaps the BLM should analyze the impacts of long-term active management and its impacts on sagebrush communities and obligates compared to the impacts of removing livestock and allowing these communities to recover naturally. Additionally, since the continued “management” of sagebrush has led to many of the situations scientists now agree are threatening these ecosystems, the removal of livestock from sagebrush communities in less than satisfactory condition should be a seriously considered alternative in the LRMP.</p>
S-0072-22	<p>Grazing across many of the Great Basin states has led to the invasion of cheatgrass, a highly flammable noxious weed that accelerates the fire cycle to less than five years destroying the sagebrush upon which sage-grouse rely for food and cover. Approximately 36 percent of the Greater Sage-Grouse range is invaded by cheatgrass.⁶⁷ Because sagebrush requires at least 15 years (and up to 50) to reoccupy burned sites, restoring invaded areas is a difficult and slow process. Preventing further spread into intact sagebrush should be prioritized.</p>
S-0072-23	<p>A recent study published in the Journal of Applied Ecology concludes that livestock grazing contributes to the domination of some western landscapes by cheatgrass, an invasive grass that both destroys sage-grouse habitat and increases the frequency of wildfire. To mitigate the spread of cheatgrass, the study suggests maintaining and restoring bunchgrasses and soil crusts, two ecological features quickly degraded under the hooves of livestock. Such mitigation would require the decrease or elimination of livestock grazing in the affected areas.</p>
S-0072-34	<p>The LRMP must address the costs of environmental degradation. The value lost from negative environmental impacts to water quality and quantity, aquatic species habitat, riparian and upland wildlife habitat quality and quantity, and native vegetation should be calculated. The DEIS must also address the potential for further exotic species and weed expansions, the costs associated with weeds and flammable invasive species, and the resulting potential for species loss. The viability of wildlife and rare plant populations and the cost to protect and preserve them in the face of chronic grazing degradation demands BLM’s attention. If the BLM is to rise to its calling as land administrator for the public, the beauty and intrinsic value of the land, as described by Aldo Leopold, must also be addressed.</p>
S-0072-35	<p>In accordance with its multiple use mission, the BLM must consider land uses other than grazing in its calculation of the economic and social values of each alternative, including administrative costs and environmental impacts to water, wildlife, plants, recreation, potential species loss, intrinsic land value, and beauty. Under the Taylor Grazing Act, the BLM must prevent injury to public lands.⁸⁵ The current grazing utilization levels are unsustainable and the proposed plan must not continue grazing at unsustainable levels. Restoration of the land will require costly action by the BLM. Taking into account the overestimated costs and underestimated benefits of reducing grazing in the planning area, the BLM must provide a thorough and balanced analysis that</p>

	considers the factors addressed in this comment.
S-0072-36	As part of the DEIS's explanation of the existing management situation, the DEIS and LRMP must provide an Allotment Management Summary detailing the conditions of each allotment within the planning area. This summary should include not only the number of AUMs permitted on each allotment, but also the actual use or "average use." Without data about actual use, the environmental assessment of livestock grazing impacts may be significantly distorted, especially on those allotments where less than the permitted AUMs are actually grazing on the land. Additionally, this section of the document should include the suspended nonuse AUMs, other forage allocations, specific resource concerns, and management objectives. The attached two-page excerpt from the July 1999 Owyhee LRMP and FEIS offers a great example of an Allotment Management Summary.
S-0072-37	The National Environmental Policy Act ("NEPA") requires that the BLM consider a reasonable range of alternatives. See 42 U.S.C. § 4332(2)(C)(iii). Considering the presence of endangered, special status, and sensitive species in the planning area, a no grazing alternative and 50% reduction in permitted grazing should be included within the reasonable range of alternatives for the LRMP.
S-0072-38	<p>The Society for Range Management (SRM) in 1974 defined an Animal Unit "to be one mature (1000 lb.) cow or the equivalent based upon average daily forage consumption of 26 lbs. dry matter per day." SRM also defined an Animal Unit Month as "The amount of feed or forage required by an animal-unit for one month." NRCS defined the forage demand for a 1,000 pound cow as 26 pounds of oven-dry weight or 30 pounds air-dry weight of forage per day. It is important to ensure that forage consumption rates by livestock are based on the size of animals present on the allotment and a reasoned estimate of their daily consumption rates. The following analysis provides some background and justifies a more current forage consumption rate for cow/calf pairs. It is BLM's obligation to ensure this forage is accurately accounted for as this is its fiduciary duty to the American People. Undercounting forage consumption by livestock results in undercharging for that forage. This is potentially defrauding the American public under the False Claims Act. Forage consumption rates must be calculated based on the current weights and consumption rates of livestock in order to provide the forage needed for wildlife, plant community sustainability and watershed protection and to ensure the public trust is not violated by undercharging for the actual weights of cattle and calves grazed.</p> <p>The current RMP authorizes a certain number of AUM's. However, that is based on an AUM equivalent to 800 lbs of forage per month. The most current information, reviewed above shows that number to be 1368 lbs/month per AUM. Therefore, if sufficient forage were available to satisfy all needs, the numbers of livestock grazed should be reduced to account for the increases in weight and correct the erroneous assumption that 800 lbs/month is an accurate consumption figure. Using the ratio between the current RMP's forage amount per AUM divided by the correct figure above, gives a needed reduction in permitted numbers and/or seasons of use of 42% to account for the RMP's understated forage consumption, without accounting for wildlife, plant and watershed needs. The BLM can not just assume that an AUM is 800 lbs of forage consumption per month. The RMP/EIS must analyze the current and potentially available forage to satisfy the forage consumption by the number of livestock it currently permits or proposes to permit. It can not assume that the forage capacity determined 20-40 years ago is applicable today.</p>
S-0074-04 (DUPLICATE)	Identify sites where off-road vehicles have scarred land, have spread noxious weeds, and have created user conflicts and take immediate steps, even if only a holding action, to keep those problems from getting worse, until they can be properly addressed in the travel management plan.
S-0080-01	Please conduct a wilderness inventory on all lands over 5000 ac. for quality and wildlife habitat and include citizen inventories as well in accordance with the most recent BLM wilderness guidelines. In the process of doing this, damage or signs of off road vehicle use should be documented and the results of these disturbances be noted. Actions should be taken to prevent damage from continuing or the spread of noxious weeds from growing worse without making an effort to curb them.
S-0087-02	In general, the Tribes does not support fencing, surface disturbing activities, development of building and structures (e.g., water development projects, power lines, etc.), and agriculture on

	public lands.
S-0087-03	The Tribes does support vast open space and landscapes that support abundant populations of native fish, wildlife, and plant species.
S-0087-04	we would like the BLM to establish goals and objectives for: 1) government to government consultation with the Tribes, 2) ensuring management actions are consistent with Treaty Rights retained by the Tribes, and 3) how to maintain or increase open space and actions that promote high quality habitat for native fish, wildlife, and plant communities.

VISUAL RESOURCES (VR)

There were no comments were received relating to visual resources.

WILDERNESS CHARACTERISTICS (WC)

COMMENT NUMBER	COMMENTS RELATED TO WILDERNESS CHARACTERISTICS (WC)
S-0003-03	The areas should be preserved as wild as possible in hopes that one day they will be designated as "Wilderness"
S-0003-05	I understand that there are citizen inventories of BLM lands in the planning area that could qualify for Wilderness Designation. Please incorporate these citizen inventories in your planning process.
S-0003-08	I really like the Arrow Creek Breaks. Like the Terry Badlands in eastern Montana it is easy to get a feeling for how wild Montana once was just by hiking away from the road a short distance here. The ruggedly beautiful Arrow Creek Breaks are fragile and easily scarred. Please protect them from the abuses of motor vehicles.
S-0003-10	Lastly I would encourage the BLM to do a complete inventory of all BLM parcels 5,000 acres or more to assess their wilderness values. Especially look for areas to provide naturalness, primitive non-motorized recreation, wildlife habitat and solitude.
S-0003-11	And QUIET. In a noisy world quiet areas are getting harder to find. Please preserve what we have.
S-0004-01 (DUPLICATE)	Conduct a wilderness inventory on all BLM lands 5,000 acres or greater to assess naturalness, opportunities for solitude or primitive recreation, and supplemental values such as wildlife, historic and cultural sites, and geologic features, etc., in accordance with the most recent BLM wilderness guidelines.
S-0004-02 (DUPLICATE)	Incorporate citizen wilderness inventories in the planning process.
S-0004-04 (DUPLICATE)	Give special consideration to conserving land near existing wildlife refuges or protected areas, are in the Rocky Mountain Front Heritage Act, or provide critical wildlife habitat.
S-0004-08 (DUPLICATE)	Pay special attention to the following areas: the Musselshell Breaks near the C.M. Russell National Wildlife Refuge; the Arrow Creek Breaks; the Judith Mountains; prairie lands north of Winnett; and Blind Horse, Ear Mountain, Chute Mountain, and Deep Creek-Battle Creek on the Rocky Mountain Front.
S-0007-01	In general, I am strongly interested in and concerned about preserving the wildland characteristics of approximately 650,000 acres of public BLM wildlands in central Montana prairies as well as forestlands and especially riparian areas.
S-0007-02	Having canoed the Missouri River numerous times since 1979, I am concerned about cottonwood regeneration, invasion of noxious weeds, loss of solitude and quiet, destruction of riparian habitat by motorized travel, (air, land and water) and livestock use.
S-0008-02	Most of the BLM lands which bound the Lewis & Clark National Forest along the Rocky Mountain Front are currently designated as 'Outstanding Natural Areas' because of their high-quality wilderness characteristics, cultural & heritage resources, wildlife habitat, and scenic value. Be sure to maintain all these areas as 'Outstanding Natural Areas' and keep the travel plan as is (i.e. for 'traditional' recreational travel for hiking & horseback riding, skiing & snowshoeing, and NO

	motorized recreational vehicle use).
S-0009-02 (DUPLICATE)	In order to support the future of public lands hunting and fishing, I ask that you adopt backcountry conservation areas within the Lewistown RMP to conserve sizeable tracts of lands that are generally intact and undeveloped, and that provide highly-functioning fish and wildlife habitat and dispersed hunting and fishing opportunities. When adopted, backcountry conservation areas should conserve intact and undeveloped BLM lands, prioritize management activities that restore habitats and control noxious weeds, sustain important public access to public lands, and maintain traditional uses of the land that are important to rural communities.
S-0036-01	<p>Emphasize and conduct wilderness inventories on all BLM lands 5000 acres or greater to assess naturalness, opportunities for solitude, opportunities for primitive recreation, and supplemental values such as wildlife, historic and cultural sites, and geologic features in accordance with most recent BLM wilderness guidelines. This should include identification of areas and waterways with wildlife or wildland values that are not fulfilled to their true potential due to noxious weeds, past commercial activities, vandalism, or ground disturbances and that could be restored. Special attention should be given to lands near existing wildlife refuges or protected areas and critical wildlife habitat. Emphasis should be placed on expanding opportunities to improve public access and consolidate public lands through conservation easements, land trades, and land acquisitions.</p> <ul style="list-style-type: none"> • Wild lands, once lost, cannot be replaced. Without protection, critical wildlife corridors will be lost and native habitats will disappear. Future generations will only be able to see wildlife and wild habitat in books and videos - what a loss!!! • Our nation is dealing with growing obesity epidemic and mental health crisis. Wild places can bring relief to stressed life styles and become superb settings to exercise and build self confidence. We need to preserve these places where people can find healthy and natural recreation. • Access to undisturbed and primitive environments helps children and citizen scientists gain interest in and understanding of science, biology, geology, ecology, environment, natural history, and ancient civilizations.
S-0048-02	My Secondary Concerns: (Wilderness Characteristics and Livestock Grazing) - I note that the Bureau of Land Management lands adjoining and within the immediate vicinity of my private land have been identified by the agency as having potential wildlife characteristics. Indeed, the area has exceptional wildlife. The burgeoning numbers of elk, mule deer, sharp-tailed grouse and turkeys - just to name a few species- are ample evidence of this. However, regardless of the abundance of wildlife in this area, any Resource Management Plan must also provide for other long-standing and beneficial multiple uses in this portion of Northeast Fergus County- primarily livestock grazing, hunting and recreational access.
S-0055-01	<p>In developing your new Resource Management Plan I ask you to give strong consideration to protecting areas with wilderness characteristics. Wild areas provide the best wildlife habitat, clean water, and, in my opinion, by far the best opportunity for recreation such as hiking and hunting away from the crowds.</p> <p>Please conduct wilderness inventories on all lands which may qualify for protection and on areas which contain critical wildlife habitat, historical values, and opportunities for quiet, non-motorized recreation. This should include areas that have the potential for restoration from past damage, current noxious weed infestations, or areas with illegal or damaging off road vehicle use. Prevention of further degradation and restricting further damage now, while the planning process is ongoing, is necessary.</p> <p>Given the vast expanse of the Lewistown management area, I strongly encourage you to take advantage of wild land inventories done by non-governmental groups, such as the Montana Wilderness Association.</p>
S-0058-01	<p>We would ask BLM to do a wilderness inventory on all BLM areas 5,000 acres or greater, and to make the results of that inventory public as soon as they are finished.</p> <p>As you make your revisions to the RMP – including which lands you will manage as Lands with Wilderness Characteristics – please consider the larger context of this plan..</p>

S-0058-02	We would also respectfully ask that you incorporate citizen wilderness inventories in your planning process.
S-0058-04	We would urge BLM to consider wildlife corridors, wilderness inventories and other data when creating management plans for the Monument area (ie the Lewistown Field Office). Please consider using the Rapid Ecoregional Assessment for the Northwestern Plains (whenever it's released) to inform yourselves where the important linkages are and to protect these lands appropriately.
S-0058-06	We would like BLM to identify places where industrial activities like oil and gas wells, pipelines, wind farms, and mines will have the least impact, and to direct development there. We would also urge you to prepare a Master Leasing plan for any areas in the Field Office where oil/gas potential and wilderness characteristics or critical sage-grouse habitat overlap.
S-0059-02	In order to conduct an effective analysis, BLM needs to assess impacts and effects such as ecological, aesthetic, historic, cultural, economic, social, or health, whether direct, indirect, or cumulative. 40 C.F.R. § 1508.8. To date, we have seen only marginal analyses of the environmental impacts to Lands with Wilderness Characteristics (LWCs). A thorough analyses will help the public and the BLM to understand the short and long-term consequences of proposed actions.
S-0059-04	Land tenure in the Lewistown planning area has already proven to be a controversial topic. In light of present circumstances, the BLM should review the previous Judith Resource, Headwaters, and Judith-Valley-Phillips RMP documents, and look at future land tenure decisions to develop a trend towards retaining sensitive and ecologically important areas, revisiting previously-identified disposal lands, and providing adequate open space for the public. As population increases, it will be crucial that consideration be given to providing adequate open space and trails on public lands. Particular attention should be taken to prevent the sale or exchange of BLM lands highly valued by local communities for their open space, wildlife habitat, and recreation opportunities they provide. Also, LWCs should be a priority as land configuration is an important consideration. Land sales or exchanges that can improve continuity, recreational opportunities, or wildlife habitat within or surrounding LWCs and ACECs should be a priority through conservation easements, land trades, and land acquisitions.
S-0059-05	We expect that the BLM will adhere to the documentation and minimum standards for review outlined in BLM manual 6310. During the summer of 2014, we will be inventorying many of these lands ourselves. We hope that, where appropriate, the BLM will consider our findings "new information" and evaluate it as such. We also strongly encourage the BLM to inventory BLM lands that surround existing WSAs which include Cow Creek, North Fork of the Sun River, Musselshell Breaks, Square Butte, Bridge Coulee, Beaver Meadows, and Antelope Creek. Please re-consider Arrow Creek as a potential LWC through modified boundary delineation in regards to the existing ROWs. Also, units with existing leases should not be precluded from becoming an LWC.
S-0059-06	We ask that the BLM take a flexible approach to boundary delineation. While we would like to see the maximum amount of acreage protected for their wilderness characteristics, we also want to be realistic and recognize that not every acre within a potential boundary will possess wilderness characteristics. However, we do want to point out that an area can have wilderness characteristics even though every acre within the area may not meet all the criteria and that the location of boundaries should primarily be set to exclude the unnatural portions of the area. BLM Manual 6310.06(C)(3)(e). Also, developed rights-of-ways (ROW) should be treated like other impacts, and the boundary should be drawn to exclude those ROWs. Please give the same consideration for all potential LWCs. As with some field offices, GIS is sometimes favored over a field visit and can lead to unfortunate conclusions. Often times, this can be the case for potential units under 5,000 acres. Not all units under 5,000 acres should be considered as a LWC, except for those that demonstrate that the area is of sufficient size as to make practicable its preservation and use in an unimpaired condition.

S-0059-07	<p>The BLM should ensure that specialists that are involved with determining naturalness for an area are mindful of BLM Manual 6310.06(C)(2)(b). Apparent naturalness is meant to be perceived by the average visitor who is not familiar with the biological composition of natural ecosystems versus human-effected ecosystems. This disposition will be important because this area can be considered cattle country to some and there will undoubtedly be various types of range improvements. Also, human impacts outside of the boundary should not normally be considered unless the impact is pervasive and omnipresent.</p>
S-0059-08	<p>Outstanding Opportunities for Solitude or a Primitive and Unconfined Type of Recreation; The word or in this definition means that the area only has to have one or the other but not both in order to have wilderness characteristics. Nor does it have to possess outstanding opportunities on every acre. We advise the BLM to follow BLM Manual 6310's mandate to not compare lands in question. The Miles City Field Office wrote in their description of opportunities for solitude on Wrangler Creek MT-020-041 that "The solitude is present; however you can see imprints of man (town of Broadus within 5 miles), so it is not considered outstanding and is typical of Eastern Montana." This is an example of comparing the parcel with other areas and stereotypes surrounding wilderness characteristics.</p> <p>Please do recognize that outstanding opportunities are present regardless of the amount of use. We know that these areas are generally of high hunting values and therefore experience high volumes of traffic at different times of the year. However, this should not exclude opportunities for solitude or primitive recreation on any average day of the year.</p>
S-0059-09	<p>We realize that supplemental values are not required to be present in order for an area to be identified as lands with wilderness characteristics. However, in the lieu of the recent sage-grouse amendment, extra care should go to documenting these values where they exist whether they be ecological, geological, scientific, educational, or historical.</p>
S-0059-10	<p>It is important that the BLM follow its multiple use and sustained yield mission and FLMPAs guidance. These public lands are to be managed for the protection of quality of scientific, scenic, historical, ecological, and archaeological values; for preservation and protection of certain lands in their natural conditions; to reconcile competing demands; to provide habitat for fish and wildlife; and to provide for outdoor recreation. FLPMA also requires the BLM to prepare land use plans that may limit certain uses in some areas. 43 U.S.C. § 1712. Our interpretation of multiple use is that it does not mean all things in all places, but to prioritize the protection of competing values for an area. This is yet another argument for the importance of a thorough wilderness inventory and proper documentation of findings.</p>
S-0059-11	<p>A thorough inventory of potential LWCs will also provide the BLM with important landscape-scale data that can be used to identify and accomplish habitat restoration.</p>
S-0059-13	<p>Recreational opportunities provided by wilderness quality lands lead directly to economic benefits to surrounding local communities . . . Because of the nature of the communities residing in the Lewistown planning area, we advise the BLM to examine the report by the Sonoran Institute "Prosperity in the 21st Century West – The Role of Protected Lands." This report found that: Protected lands have the greatest influence on economic growth in rural isolated counties that lack easy access to larger markets. From 1970 to 2000, real per capita income in isolated rural counties with protected land grew more than 60 percent faster than isolated counties without any protected land. This clearly shows that wilderness quality lands and their due protection are economically vital for local economies.</p>

S-0059-14	<p>Our current understanding is that travel management will be completed within 5 years of the RMP. However, open, closed, and limited ORV zones still exist. We feel that all routes within potential lands with wilderness characteristics should be considered closed until travel management can be completed. Where this is not possible, limit vehicles to existing routes only.</p> <p>As a part of protecting these landscapes, it is important to protect them so that we can keep enjoying them and not just block them off. Therefore, we encourage the BLM to identify and prioritize access to these units and improve access to potential LWCs that are currently limited or unable to access. When there are multiple roads/routes leading to the same destination, the BLM should identify which roads/routes can be closed or limited while allowing access.</p> <p>We ask that that BLM also consider the recreational opportunity spectrum within the planning area and identify areas for semi-primitive, non-motorized recreation and prioritize their protection. Please see Appendix H of the BLM Alaska Ring of Fire Proposed RMP/Final EIS.</p> <p>Even though the plan is not addressing travel management, the BLM has the authority to close problem routes. Since it could be many year before a travel management plan is completed and implemented, we ask that where problem routes are identified through the planning process, that you exercise your authority to management vehicle use, on an interim basis, until a travel management plan adopted to prevent further damage.</p>
S-0059-17	<p>We encourage the BLM to look for ways to minimize conflict with potential lands with wilderness characteristics. This includes analyzing the suitability of units for closures, NSO, and CSU stipulations for specific units. Also, please analyze the suitability of these potential LWCs as ROW exclusion or avoidance zones.</p>
S-0059-18	<p>Master Lease Plans are a new and effective method of resolving conflict in areas of competing interests and uses. This field office has many areas that have competing and conflicting interests and an MLP could adequately address them. The current resources we see that are in conflict include: greater sage-grouse, lands with wilderness characteristics, hunting and fishing, and oil and gas development. Not all of those interests are in direct conflict with each other. However, based on fluid minerals, wildlife data, and potential lands with wilderness characteristics, we would like to nominate the following regions:</p> <ul style="list-style-type: none"> · Southeast in the planning unit. This is the area south of Highway 200 and east of Highway 87. This includes the Elk Creek PLWC, Pike Creek PLWC, Cemetary Road PLWC, Cat Creek PLWC, and Cottonwood Creek PLWC units. This area has high conflict between recreational opportunities and oil and gas development. · Northcentral in the planning unit. This is the area north of Winifred including Chimney Bend PLWC, Woodhawk Creek PLWC, Dry Armells PLWC, and Armell’s Creek PLWC. This region has high conflict between wildlife and habitat and oil and gas, and oil and gas development and recreational opportunities. · Western portion of the unit along the Rocky Mountain Front. This area includes Blind Horse Creek PLWC, Ear Mountain PLWC, Chute Mountain PLWC, Deep/Battle Creek PLWC, Beaver Meadows PLWC and the North Fork of the Sun River WSA. This has high conflict between oil and gas development and wildlife habitat, and oil and gas development and recreational opportunities.
S-0061-01	<p>The main goal I would like to see the BLM pursue is on being more conservation oriented. In light of that, I would like to see the areas that have wilderness values or characteristics maintained. Included in your analysis should be citizen inventories of wild lands. Please consider areas along the Rocky Mtn Front that are not protected now. These areas are in the Rocky Mtn Front Heritage Act, but they may not be protected if the Act does not pass.</p>
S-0062-06	<p>Please incorporate citizen inventories of lands with wilderness characteristics in one or more alternatives in the EIS.</p>
S-0065-01	<p>Consider citizen inventories when planning areas that are considered Lands with Wilderness Characteristics (LWC areas). Citizen inventories would be conducted in accordance with BLM manuals 6310 and 6320 in order to reflect the new inventory process.</p>
S-0066-04	<p>These issues might be resolved somewhat if these BLM lands were included into the Cat Creek LWC Land?</p>

S-0070-01	I have always felt at home in Central Montana's open country and would like to see more of this land protected as wilderness. As more people use roadless and wilderness areas for recreation more BLM land will be needed to provide quiet recreation. I urge the BLM to carefully inventory their roadless lands with an eye to protecting more of the magnificent wild country. This should be done before increasing energy development.
S-0070-02	Any lands adjoining existing protected areas such as the Missouri Breaks/CM Russell Nat. Wildlife Refuge. and Lands adjoining the Rocky Mountain Front should receive protection as part of a combined Rocky Mountain Front Heritage Act Strategy.
S-0073-12	Conserve Backcountry Areas: As part of the planning process, we suggest that the BLM evaluate areas of public land that are generally intact, undeveloped and that provide high quality fish and wildlife habitat. For lands that meet these criteria, we ask that the BLM allocate or consider designating these lands as "backcountry conservation areas" (BCA) in order to conserve and restore unfragmented fish and wildlife habitat and dispersed hunting and fishing opportunities. Also, we ask that you consider nominations from the public, both for areas that should be allocated as BCAs and appropriate management prescriptions.
S-0077-01	Avoid an overly strict approach when determining whether an area meets the criteria as a land with wilderness characteristics.
S-079-01 (DUPLICATE)	*Wilderness - Conduct a wilderness inventory on all BLM lands 5,000 acres or larger in size to assess naturalness, opportunities for solitude or primitive recreation, and supplemental values such as wildlife, historic and cultural sites, geologic features etc. in accordance with the most recent BLM wilderness guidelines. Also, incorporate and give serious consideration to citizen wilderness inventories in the planning process.
S-0080-01	Please conduct a wilderness inventory on all lands over 5000 ac. for quality and wildlife habitat and include citizen inventories as well in accordance with the most recent BLM wilderness guidelines. In the process of doing this, damage or signs of off road vehicle use should be documented and the results of these disturbances be noted. Actions should be taken to prevent damage from continuing or the spread of noxious weeds from growing worse without making an effort to curb them.
S-0081-01	Complete a comprehensive inventory of all natural lands of a minimum size, e.g., 3-5,000 acres.
S-0081-02	Gather the results of previous wildland inventories, consolidating the findings and recommendations.
S-0081-03	Identify lands free of, or with minor, human activity and scarring.
S-0081-04	Scope and group natural lands by proximity of favorable resource values to wildlife and human needs and values.
S-0081-05	Identify lands with exceptional educational and cultural resource value and accessibility.
S-0081-06	Identify lands with native habitat for the preservation and expansion of native creatures.
S-0082-01	The Montana Wilderness Association (of which I am a member) has identified some 200,000 acres of remote, undeveloped BLM land that still have all the characteristics of wilderness. Most of these lands are in the Musselshell Breaks near the C.M. Russell National Wildlife Refuge. But others include unroaded land in the Judith Mountains and intact prairie lands north of Winnett. These areas should be designated as wilderness.

WATER RESOURCES (WR)

COMMENT NUMBER	COMMENTS RELATED TO WATER RESOURCES (WR)
S-0004-03 (DUPLICATE)	Identify areas and waterways with wildlife or wildland values that are not fulfilling their potential because of noxious weeds, past commercial activities or ground disturbances that could be restored.
S-0007-01	In general, I am strongly interested in and concerned about preserving the wildland characteristics of approximately 650,000 acres of public BLM wildlands in central Montana prairies as well as forestlands and especially riparian areas.

S-0013-03	PROTECT THE WATER FOR THE BENEFIT OF ALL, NOT JUST FOR PROFITEERS. THE WILDIFE AND BIRDS ARE BEING DESTROYED BY BLM BRINGING IN POLLUTING INDUSTRIES AND THAT NEEDS TO TOTALLY STOP.
S-0034-38	The amount of sediment production from federal lands is relatively small compared to sediment production that ultimately reaches stream courses from non-federal lands.
S-0036-01	Emphasize and conduct wilderness inventories on all BLM lands 5000 acres or greater to assess naturalness, opportunities for solitude, opportunities for primitive recreation, and supplemental values such as wildlife, historic and cultural sites, and geologic features in accordance with most recent BLM wilderness guidelines. This should include identification of areas and waterways with wildlife or wildland values that are not fulfilled to their true potential due to noxious weeds, past commercial activities, vandalism, or ground disturbances and that could be restored.
S-0044-03	Of special note is The Nature Conservancy's Pine Butte Swamp Preserve, portions of which are underlain by federal minerals. Peat wetlands at Pine Butte support significant populations of 13 plant species of concern including <i>Braya humilis</i> , <i>Gentianopsis macounii</i> , <i>Primula incana</i> , <i>Salix serissima</i> , <i>Carex craweii</i> , <i>Eleocharis rostellata</i> , <i>Juncus acuminatus</i> , <i>Kobresia simpliciuscula</i> , <i>Trichophorum cespitosum</i> , <i>Trichophorum pumilum</i> , <i>Cinclidium stygium</i> , <i>Meesia triquetra</i> , and <i>Scorpidium scorpioides</i> . These wetlands at Pine Butte are likely the largest peatland complex in Montana. These wetlands were recently recognized by the Montana Native Plant Society as part of its Important Plant Areas Program (http://www.mtnativeplants.org/Important%20Plant%20Areas). Maintenance and protection of surface and sub-surface hydrology in and around the wetlands is crucial for maintenance of the wetland complex. These wetlands also provide critical habitat for many wildlife species, most notably the security and feeding habitat for grizzly bears. Given these significant values we believe this area should receive the highest protections possible, preferably closure to leasing or at minimum no surface occupancy.
S-0044-05	The Nature Conservancy is concerned that federal mineral leasing and development could have significant impacts to the surface and conservation values that have been protected on the Rocky Mountain Front. The lands on the Front contain numerous wildlife, vegetation, hydrologic, cultural and large scale habitat values that require special consideration. Decisions regarding federal minerals on the Front should offer the highest protections possible for these special values, including special protective stipulations, no surface occupancy, or closure to leasing, especially on lands where the surface has been protected for conservation purposes.
S-0045-01	<p>The Montana Native Plant Society's Important Plant Areas (IPA) Program identifies the most important sites for plant conservation across Montana using consistent criteria. An IPA supports an exceptional population of one or more globally rare plants or an exceptional assemblage of plants rare or threatened in Montana. The Lewistown RMP Planning area includes the Pine Butte Peatlands IPA in west-central Teton County. The Pine Butte Peatlands provide habitat for 13 species of concern considered rare in Montana, including <i>Braya humilis</i>, <i>Gentianopsis macounii</i>, <i>Primula incana</i>, <i>Salix serissima</i>, <i>Carex craweii</i>, <i>Eleocharis rostellata</i>, <i>Juncus acuminatus</i>, <i>Kobresia simpliciuscula</i>, <i>Trichophorum cespitosum</i>, <i>Trichophorum pumilum</i>, <i>Cinclidium stygium</i>, <i>Meesia triquetra</i>, and <i>Scorpidium scorpioides</i>. Many of these populations are very large. The Pine Butte Peatlands are possibly the largest peatland complex in Montana. A copy of the Pine Butte Peatlands IPA nomination is enclosed.</p> <p>The Pine Butte Peatlands are fed primarily by sub-surface water from the Teton River moving through intervening alluvial deposits. Maintenance of the functional hydrologic system from the Teton River watershed to the Teton River and surrounding substrates is crucial to the existence of the Pine Butte Peatlands. One potential threat to the Pine Butte Peatlands is oil and gas development. Oil and gas development could directly destroy habitat, disrupt hydrology, or alter and degrade water quality. While there is no BLM surface ownership within the IPA, portions of the IPA are underlain with federally owned minerals. The federal minerals in T24N R8W are subject to a congressional mineral withdrawal, but those in T24N R7W are not. Any decisions regarding federal minerals under the peatlands or in surrounding areas that may affect the peatland hydrology should offer the highest possible protections for these lands, either closure to leasing or no surface occupancy stipulations.</p>

S-0047-01	In addition, the quantity of water needed to hydraulically fracture a well must be incorporated in the EIS. It is the duty of the BLM to consider the geology, hydrogeology and hydrology of every area where oil and gas development may occur.
S-0047-02	First, we are concerned about threats to water quality from oil and gas development. According to the BLM’s factsheet on the revised hydraulic fracturing rule, “Approximately 90 percent of wells drilled on Federal and Indian lands use hydraulic fracturing, but BLM’s current regulations governing hydraulic fracturing operations on public lands are more than 30 years old and were not written to address modern hydraulic fracturing activities” (Attachment 1), Although Montana has regulations that provide for minimal chemical disclosure, most of the chemicals used in oil and gas drilling are kept secret from the public. In addition to these rules, BLM recently released draft chemical disclosure and well stimulation rules ¹ . We believe that, even though these rules also do not go far enough to protect water quality, they have some good provisions, and the final RMP must include these draft rules.
S-0047-03	One reason chemical disclosure is important is its potential role in adequate baseline water quality testing. Baseline testing is essential to prove that clean water existed before oil and gas development. The state of Wyoming, through its 2013 energy policy titled “Leading the Charge,” recommends “baseline pre-development water quality testing”. According to Wyoming’s policy statement, “this initiative seeks to establish minimum baseline water quality testing requirements and standards for oil and gas operators prior to development.” The BLM should require that oil and gas companies pay for independent, third-party baseline water quality testing in all federal leases. Since the state of Montana is currently beginning a water budget process, these baseline testing results should also be shared with the state to capture the whole water picture in Montana. Baseline data can help regulators understand when pollution has occurred, as well as the nature of the pollution.
S-0047-04	Although the current public debate focuses on contamination from hydraulic fracturing, other deficiencies such as faulty well casing, cement failure, vicinity to aquifers and surface spills are all major threats to water quality and are the most common ways that water becomes contaminated in drilling operations. In Central Montana, the targeted Heath Shale is within 1000 feet above the Madison Aquifer, and within 1000 feet below the Kootenai formation aquifer. Earthjustice has documented with an interactive map many of the known contamination cases across the US ³ . However, since the water contamination that the Fort Peck Indian Tribe is facing from old oil wells is not on the map, it is certain that other incidents are also not accounted for. Through the RMP, the BLM should make sure that stronger casing and cementing standards are in place. These standards are currently included in the draft chemical disclosure and well stimulation rules just released by the BLM.
S-0047-05	There are ways to prevent some of this contamination, and neighboring states such as North Dakota have already implemented regulations to do so. According to a recently released report by the Western Organization of Resource Councils (Gone for Good: Fracking and Water Loss in the West, 2013, Attachment 3), “after 47 reserve pits overflowed during the spring thaw of 2011, the state Department of Mineral Resources initiated new rules that essentially eliminated reserve pits at the sites of fracked wells.” This water management practice is called a closed-loop system and is very effective for preventing some water pollution. Interestingly, despite this step forward, the filter socks that have been straining frack water have been exceeding federal radioactivity limits. This is an entirely new threat to our water system and, since the Montana Bakken stems from the same formation, it is a likely threat in Montana as well as North Dakota. The RMP must take these new developments into consideration. One resource could be the draft EPA “Study of the Potential Impacts of Hydraulic Fracturing on Drinking Water Resources.” This study is scheduled to be completed in 2016 and the data collected so far should be addressed in the RMP.
S-0047-06	The disposal of new surface discharge of oil and gas produced water into streams or other flow-connected surface features on BLM administered land should be used in order to fully protect water quality near oil and gas operations. Water protection measures need to be stringent in order to preserve Montana’s precious water system. Overall, if any of our groundwater or surface water is contaminated by drilling chemicals, fracking chemicals, or radioactive waste water there is no turning back. We need to be extremely careful during this process and make sure that the RMP is a guiding document that will protect our supplies of clean water.

S-0047-07	<p>On the other side of the water issue are quantity concerns. Oil and gas development uses large amounts of fresh water. The EPA has estimated that between 70 and 140 billion gallons of water are required annually for fracking⁶. This water is completely lost to the system since it is contaminated with chemicals and much of it is disposed of into deep-injection wells. This is in contrast to agricultural water use. Agriculture is the largest water user in Montana, but the water used is sent back into the overall water cycle. The RMP's goals must be to protect water quality for municipal, industrial, agricultural, recreation, and residential purposes by adopting protective measures to meet federal, tribal, state, and local water quality requirements, however, the importance of water, the impacts to water quantity from oil and gas development must be fully mitigated.</p>
S-0047-08	<p>First, we recommend the BLM document the amount of water available in the system on federal lands. The BLM needs to track the amount of water used for federal oil and gas drilling. Some water resources are being documented on the industry-run website, FracFocus (fracfocus.org). However, from research mentioned in the Gone for Good report from Western Organization of Resource Councils, this data is incomplete. The BLM needs to take the lead on this through the RMP. Additionally, once documented, each well should have monitoring systems to ensure that the actual amount of water being used is accurate. Flow control devices should be installed on all BLM water resources.</p>
S-0047-09	<p>Finally, the BLM must take action to alleviate some of the water loss from oil and gas operations. The RMP should require recycling of drilling and frack water. Oil and gas companies have the technology to do this and, in Pennsylvania, – where there are only a few injection wells in the state and no hazardous waste water treatment facilities – water treatment companies are in high demand.</p>
S-0049-05	<p>It is important to characterize both the existing and potential groundwater drinking water resources in the planning area. We recommend the RMP/EIS include the following information:</p> <ul style="list-style-type: none"> • A description of all aquifers in the study area, noting which aquifers are Underground Sources of Drinking Water (USDW s). Federal Safe Drinking Water Act regulations define a USDW as an aquifer or portion thereof: (a)(1) which supplies any public water system ; or (2) which contains a sufficient quantity of ground water to supply a public water system; and (i) currently supplies drinking water for human consumption; or (ii) contain s fewer than 10,000 mg/1total dissolved solids; and (b) which is not an exempted aquifer (See 40 CFR Section 144.3); • Available water quality and water yield information for each aquifer; • Maps depicting the location of sensitive groundwater resources such as municipal watersheds, source water protection zones (available from the Montana Department of Environmental Quality-MDEQ, Joe Meek -see contact information below in comment #5), sensitive aquifers, and recharge areas; • Descriptions and locations of groundwater use (e.g., public water supply wells, domestic wells, springs, and agricultural and stock wells. • A map and discussion of proposed wells, existing producing wells, and nonproducing wells in the area including their status (e.g., idle, shut-in, plugged and abandoned), if available. Please refer to the Montana Board of Oil and Gas Conservation for location and abandonment information.
S-0049-06	<p>The EPA recommends that the RMP/EIS analyze potential impacts to groundwater quality and quantity related to resource extraction such as mining and oil and gas production. Potential impacts include those associated with the following: leaks and spills; production and disposal of produced water or processing waters; use of pits, underground injection control (UIC) wells, tailing ponds, infiltration basins and evaporation ponds; production wellbore integrity; closure requirements; pipeline use; and impacts associated with restimulation and abandonment of existing wells. The EPA also recommends that the RMP/EIS discuss measures the BLM will require at the project level to minimize the potential for these impacts to occur and how the operations will be monitored to determine if the mitigation measures are effective.</p>

S-0049-07	<p>Specifically, the EPA recommends that the BLM analyze and disclose potential groundwater protection, monitoring and mitigation measures, including:</p> <ul style="list-style-type: none"> • BMPs and measures such as water reuse, closed loop drilling, lining of evaporation ponds, monitoring of water quality and water levels, closure and monitoring of tailings ponds, reserve pits and evaporation ponds; • Setback stipulations, such as No Surface Occupancy (NSO), to minimize the potential for impacts to potential drinking water resources, including domestic water wells and public water supply wells. Setbacks are effective health and environmental protection tools because they provide an opportunity for released contaminants to attenuate before reaching a water supply well. They may also afford an opportunity for a release to be remediated before it can impact a well, or for an alternate water supply to be secured. For these reasons, we recommend that the BLM require a minimum 500 foot NSO setback from private wells. We note that a number of states including Colorado and North Dakota have adopted a 500 foot setback from occupied dwellings (and by default, the associated domestic well). The EPA also encourages the BLM to consider sourcewater protection zones delineated by the MDEQ when evaluating the basis and need for setbacks from public water supply wells (see comment #5 below) ;
S-0049-08	<ul style="list-style-type: none"> • A mitigation plan for remediating future unanticipated impacts to drinking water wells, such as requiring the operator to remedy those impacts through treatment, replacement, or other appropriate means;
S-0049-09	<ul style="list-style-type: none"> • Abandonment procedures for sealing wells no longer in use in order to reduce the potential for inactive wells to serve as conduits for fluid movement between production zone(s) and aquifer(s). This is particularly important where existing wells do not have surface casing set into the base of USDWs and lack sufficient production casing cement.
S-0049-10	<p>The EPA recommends the RMP/EIS describe the current water quality conditions for surface water bodies within the planning area, including intermittent, perennial, and ephemeral streams, rivers, lakes, reservoirs, and surface water drinking water sources. We recommend comparing existing conditions to existing water quality standards or other reference conditions and presenting associated water quality status and trends.</p>
S-0049-11	<p>The EPA also recommends the RMP/EIS include the following information:</p> <ul style="list-style-type: none"> • A map of water bodies within and/or downstream of the planning area that includes perennial, intermittent and ephemeral water bodies; water body segments classified by the MDEQ as water quality impaired or threatened under the Clean Water Act (CWA) Section 303(d); water bodies considered not impaired by MDEQ, and water bodies that have not yet been assessed by the MDEQ for impairment status. We also recommend that a table be provided to identify the designated uses of the water bodies and the specific pollutants of concern, where applicable; • A map of municipal watersheds and designated source water protection zones; and • Maps and descriptions of topography and soils, specifically steep slopes and fragile or erodible soils, especially near surface waters and intermittent/ephemeral channels.
S-0049-12	<p>We recommend that the RMP/EIS analyze potential impacts to surface waters related to erosion and sedimentation from land disturbance and stream crossings, as well as potential impacts associated with oil and gas well development, including drilling and production and potential spills and leaks from pits, evaporation ponds, and pipelines. We also recommend analyzing potential impacts to impaired water bodies within and/or downstream of the planning area, including water bodies listed on the most recent EPA-approved CWA § 303(d) list. Where TMDL analyses for impaired water bodies within, or downstream of, the planning area still need to be developed, we recommend that proposed activities in the drainages of CWA impaired or threatened water bodies be either carefully limited to prevent any worsening of the impairment or avoided where such impacts cannot be prevented.</p>
S-0049-13	<p>To fully disclose and, if necessary, mitigate the potential impacts of soil disturbance, we recommend that the RMP/EIS include an estimate of erosion rates and resulting impacts to water quality for each alternative. Erosion rates were calculated using the Water Erosion Prediction Project model (WEPP), a webbased interface developed by the U.S. Department of Agriculture, Agricultural Research Service, which can be accessed at http://www.ars.usda.gov/Research/docs.htm?docid=18084&pf=l. We recommend that the BLM consider using this model or another appropriate model that would be applicable to this planning area.</p>

S-0049-14	<p>Accordingly, the EPA recommends that the BLM evaluate setback distances identified through leasing stipulations such as NSO for perennial waters including lakes and reservoirs, intermittent and ephemeral streams, steep slopes, and impaired waters within the planning area. The EPA recommends the following minimum NSO setbacks:</p> <ul style="list-style-type: none"> • Minimum 100 foot NSO setback from slopes greater than 30%; • Minimum 500 foot NSO setback for flowing waters (rivers and streams) or 100-year floodplain, whichever is greater; • Minimum 500 foot NSO setback for lakes, ponds and reservoirs, wetland and riparian areas and springs; • Minimum 750 foot NSO setback for 303(d) Impaired waters; • Minimum 1,000 foot NSO setback for special or significant waters; and • Minimum 100 foot NSO setback for intermittent and ephemeral streams. <p>In addition, we recommend the BLM consider a designation of NSO within Areas of Critical Environmental Concern (ACEC) where important water resources may be impacted.</p>
S-0049-15	<p>In order to ensure that public drinking water supply sources (e.g., surface water sources, including groundwater under the direct influence of surface water (GWUDISW) sources, and groundwater sources) are protected from potential impacts associated with BLM-authorized activities in the planning area, it is important to identify where these sources are located. Therefore, the EPA recommends that the RMP/EIS include a map delineating source water protection areas for public water supply wells. We also recommend identifying reservoirs that are drinking water sources and disclosing potential impacts to these sources.</p>
S-0049-16	<p>In order to ensure public drinking water supply sources (e.g., surface water sources, including GWUDISW sources, and groundwater sources) are protected from potential impacts associated with resource extraction, the EPA recommends the following NSO language:</p> <p>Municipal Supply Watersheds - NSO within any of the following areas, as deemed appropriate by the BLM:</p> <ul style="list-style-type: none"> • The entire watershed ; or • Local Source Water Protection Planning Areas where delineated in a Source Water Protection Plan; or • Surface Water Spill Response Region or Groundwater Inventory Region defined by Source Water Assessments that have been delineated or evaluated by the State. <p>Surface Water Spill Response Regions are ½-mile-wide zones (on both sides of rivers or streams, upstream of drinking water intakes. They include the water body with the surface water intake and significant tributaries, for 10 miles upstream of the drinking water intake. For lakes and reservoirs, they include a ½-mile-wide zone around the water body.</p> <p>Groundwater Inventory Regions are based on a three-year time of travel or a fixed radius of 1,000 feet (concentric buffer) around the public water supply well or spring.</p>
S-0049-17	<p>For surface water sources, if the Municipal Supply Watersheds NSO stipulation is not deemed feasible by the BLM, then at a minimum we recommend a 1000-foot NSO or Controlled Surface Use (CSU) setback on both sides of the river or stream, for 10 miles upstream of the intake. For lakes and reservoirs, this would include a 1000-foot NSO or CSU setback around the water body.</p>
S-0049-18	<p>For groundwater and GWUDISW sources, if the Municipal Supply Watersheds NSO stipulation is not deemed feasible by the BLM, we recommend a minimum 1,000-foot CSU concentric buffer for these sources.</p>
S-0049-19	<p>The EPA also recommends the BLM include a commitment in the Final EIS and Record of Decision to provide notice to lessees regarding these important areas in the planning area.</p>
S-0049-20	<p>We recommend that the RMP/EIS present inventories and maps of existing wetlands and waters of the U.S. Within the planning area, including waters that are regulated under Section 404 of the CWA and wetlands and waters that are protected under Executive Order 11990 -Protection of Wetlands (May 24, 1977). We suggest providing information on acreages and channel lengths, habitat types, values, and functions of these waters.</p>

S-0049-21	<p>We suggest that the BLM describe potential indirect impacts to wetlands and riparian areas that could occur at the project level due to impacts on the following:</p> <ul style="list-style-type: none"> • Stream structure and channel stability; • Streambed substrate, including spawning habitats; and • Stream bank vegetation, riparian habitats, and aquatic biota.
S-0049-22	<p>We recommend that the RMP/EIS analyze methods to protect wetlands, riparian areas and floodplains, including the following:</p> <ul style="list-style-type: none"> • Application of minimum setback requirements through leasing stipulations such as NSO for wetlands and riparian areas. The EPA recommends NSO within the footprint of wetland and riparian areas, as well as a 500 foot NSO setback from wetland and riparian areas; • Leasing stipulations to protect floodplains, such as NSO within the 100-year floodplain; and • Delineation and marking of perennial seeps, springs and wetlands on maps and on the ground prior to project level development to ensure identification of these resources to facilitate their protection.
S-0049-23	<p>We also recommend including a list of potential mitigation requirements and BMPs that may be applicable at the project level for grazing, construction, oil and gas well drilling and production activities to prevent adverse impacts to these aquatic resources. These could include silt fences, detention ponds and other stormwater control measures.</p>
S-0049-24	<p>We recommend that the RMP/EIS include a general discussion of the following:</p> <ul style="list-style-type: none"> • A range of water demand per well developed in the planning area (based on predicted well depths, formation characteristics, and well designs, as well as hydraulic fracturing operations, if used); • Possible sources of water needed for oil and gas development; and • Potential impacts of the water withdrawals (e.g., drawdown of aquifer water levels, reductions in stream flow, impacts on aquatic life, wetlands, and other aquatic resources).
S-0049-25	<p>In addition, the EPA recommends the RMP/EIS include a general discussion of how flow back and produced water will be managed including:</p> <ul style="list-style-type: none"> • Estimated volume of produced water per well; • Options and potential locations for managing the produced water (i.e., UIC wells, evaporation ponds, and surface discharges); • Possible target injection formations, formation characteristics and depth of any UIC wells; and • Potential impacts of produced water management.
S-0049-26	<p>The EPA also recommends the BLM encourage operators to consider recycling produced water for use in well drilling and stimulation, thereby decreasing the need for water withdrawals and for produced water management/disposal facilities and minimizing the associated impacts.</p>
S-0049-27	<p>The EPA recommends that the RMP/EIS address how water quality monitoring in the planning area will occur prior to, during, and after anticipated development to detect impacts to both surface water and groundwater resources, including private well monitoring. A recent example of a water quality monitoring plan is the "Long-Term Plan for Monitoring of Water Resources" developed by BLM for the Gasco Energy Inc. Uinta Basin Natural Gas Development Project Final EIS.² Also, the National Ground Water Association's Water Wells in Proximity to Natural Gas or Oil Development Brief³ provides information on the importance of baseline sampling for private wells and types of analysis recommended.</p>
S-0049-28	<p>The EPA recommends that the RMP/EIS include a summary description of the types of impacts that may result from grazing to wetlands and associated springs. Such impacts may include functional conversion of wetlands (e.g., forested to shrub-scrub); changes to supporting wetland hydrology (e.g., snow melt patterns, sheet flow, and groundwater hydrology); and wetland disturbance. With respect to grazing, we also recommend that the RMP/EIS describe how the BLM intends "to minimize the destruction, loss or degradation of wetlands, and to preserve and enhance the natural and beneficial values of wetlands" as described in Executive Order (EO) 11990, Protection of Wetlands.</p>

S-0049-29	Based on the BLM' s experience with grazing in the planning area, we recommend the RMP/EIS include an assessment of each alternative's potential impacts and benefits to aquatic resources, including impacts to water quality, stream and wetland processes, and fish populations/habitat.
S-0049-30	<p>We recommend that the RMP/EIS include a list of potential mitigation measures with consideration of the following:</p> <ul style="list-style-type: none"> • Special protections, such as buffer zones, for high quality riparian and wetland resources including springs and fens. • Management to limit deposition of animal waste in and adjacent to water bodies , such as protecting or repairing any existing exclusions and providing upland water developments and development of new range improvements to discourage congregation near water bodies. • Enhanced monitoring of resource conditions adjacent to high value water resources . • Monitoring to assess effectiveness of range improvements in protecting aquatic resources.
S-0049-31	<p>We recommend the RMP/EIS identify the features of an effective adaptive management plan, including the following:</p> <ul style="list-style-type: none"> • Achievable and measurable objectives to provide accountability and guide future decisions; • Specific decision thresholds with identified indicators for each impacted resource ; • Targets that specify a desired future condition; • Commitment to implement a monitoring plan with protocols to assess whether thresholds are being met; • Commitment to use monitoring results to modify management strategies as necessary; and • Designated timeframes for completion of necessary management modifications.
S-0049-33	The NOI indicates that the RMP/EIS process will incorporate BLM's Standards for Rangeland Health and Guidelines for Livestock Grazing Management. We recommend the RMP/EIS include discussion of monitoring requirements that will be applied at the project level to ensure that these standards and guidelines are being met. An explanation would be helpful regarding how the Annual Operating Instructions will ensure compliance with project level monitoring requirements for parameters such as water quality. To help evaluate and adjust grazing management strategies, the EPA also recommends that the RMP/EIS include a monitoring section that describes how monitoring will be implemented on an allotment level and at the watershed or sub-watershed level to determine rangeland condition (including water quality) status and trends.
S-0049-35	<p>Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," applies to federal agencies that conduct activities that substantially affect human health or the environment. Consistent with this order, the EPA recommends the NEPA analysis for the Lewistown RMP include the following:</p> <ul style="list-style-type: none"> • Identification of any minority, low-income and tribal communities within the geographic scope of the impact area, including the sources of data and a description of the methodology and criteria utilized. The EPA recommends comparing census block group percentages (if available, or, at a minimum, census tract data) for below poverty and minority populations with the state average, and conducting the following steps if a block group percentage is greater than the state average. The EPA does not recommend use of higher thresholds. • A detailed assessment of environmental justice and other socioeconomic concerns for any environmental justice communities, to the extent information is available, including: <ul style="list-style-type: none"> • A discussion of the potential direct, indirect and cumulative environmental impacts of potential BLM-authorized RMP activities on the health of these communities, including air quality and water quality and quantity impacts. • An evaluation of the socio-economic impacts to the local communities, including the potential for any additional loading placed on local communities' abilities to provide necessary public services and amenities. • A determination of whether there may be disproportionately high and adverse impacts, including cumulative impacts, on the identified communities. • Mitigation measures to reduce any disproportionate adverse impacts. We recommend involving the affected communities in developing the measures. The EPA recognizes the need for early

	involvement of the local communities, and supports the meaningful participation of community representatives in the NEPA process.
S-0054-20	Analyze springs, seeps, and pipelines to see if modifications are needed. (NW Colorado RMP Amendment).
S-0069-01	Although the BLM land in our pasture can't be fenced because of the roughness of the Missouri River Breaks area, we take care of it the same as for our own pasture. We do not overgraze our pasture. Fewer cattle are pastured in a dry year. It is a fact that grazing makes healthier grass not only for cattle but also for wildlife. The fuel for wildfires is greatly reduced. We provide water sources for our cattle and wildlife also benefits. In other words, we manage this environment to be productive and the Federal government has an income from BLM land. If cattle grazing should be reduced, wildlife will certainly suffer, and probably move to other areas.
S-0072-05	<p>In the Anticipated Planning Issues Management Concerns document provided with the scoping notice, the BLM offers the following in regard to livestock grazing:</p> <p>Preliminary Planning Considerations</p> <ul style="list-style-type: none"> ➤ Conform with existing laws, regulations, and BLM policy pertaining to livestock grazing on public lands ➤ Incorporate Montana Standards for Rangeland Health and Guidelines for Livestock Grazing Management ➤ Consider ecological site inventory information ➤ Protect important biological resource functions that provide for soil stability, water quality, and healthy riparian and upland vegetation communities ➤ Provide for the protection and restoration of native species and potential natural communities ➤ Authorize use to minimize environmental impacts under the principles of multiple use and sustained yield. <p>The LRMP must specifically address how these goals will be achieved. For example, Guideline #1 of the Montana Standards for Rangeland Health and Guidelines for Livestock Grazing Management provides that "[g]razing will be managed in a manner that will maintain the proper balance between soils, water, and vegetation over time." While such guidelines articulate important goals, those goals will not be achieved without requiring that land managers meet quantitatively measurable terms and conditions. The LRMP must provide clear, quantitative terms and conditions to guarantee compliance with those guidelines.</p>
S-0072-06	<p>In regards to livestock grazing generally, Western Watersheds Project urges the BLM to incorporate the following in the LRMP:</p> <p>Specific measurable terms and conditions for livestock grazing in riparian areas, uplands, and wildlife and fisheries habitat, including:</p> <ul style="list-style-type: none"> (i) a minimum of 7" stubble height remaining on hydric soils riparian greenlines after livestock grazing (ii) a 10% maximum annual bank or wetland alteration from all sources for streams and wetland hydric and mesic soil areas of upland seeps, springs, wet meadows and aspen clones (iii) a maximum annual woody browse utilization by all browsing ungulates of 15% on cottonwood, aspen, woody shrub, and willows (iv) a maximum annual grazing utilization of perennial grass species on upland landscapes by all grazer of 35% (v) a minimum 9" residual perennial native grass cover for ground-nesting birds like sage-grouse and sharp-tailed grouse.
S-0072-08	The BLM must scientifically and accurately determine those lands which are capable and suitable for livestock grazing. The BLM must also accurately and quantitatively determine how much forage (i.e. forage capacity) is currently available. Additionally, the BLM must properly allocate that forage to watershed and stream protection, wildlife habitat and food, then to livestock if available.

S-0072-29	The NEPA documents should review the changes that are likely to occur in the project area due to global climate change over the 10-year period of the proposed permit. While uncertainties remain regarding the timing and extent of impacts from climate change, modeling indicates that on average, Montana will likely experience higher temperatures in all seasons; longer dry periods; heavy precipitation events; more frequent droughts; and increased wildfire risk. These changes will affect the landscape of planning area, especially riparian and water resources and the species that depend on them as well as the amount and availability of forage. Landscapes that are less fragmented provide greater opportunity for species to shift ranges without being blocked (Opdam and Wascher, 2004 ⁷⁷). Fragmentation of the landscape through vegetation removal or grazing infrastructure such as fencing exacerbates the challenges that species are already dealing with in trying to adapt to a changing climatic regime. Removing or reducing livestock would both alleviate a widely recognized and long-term stressor and make these public lands less susceptible to the effects of climate change (Beschta et al., 2012 ⁷⁸).
S-0072-34	The LRMP must address the costs of environmental degradation. The value lost from negative environmental impacts to water quality and quantity, aquatic species habitat, riparian and upland wildlife habitat quality and quantity, and native vegetation should be calculated. The DEIS must also address the potential for further exotic species and weed expansions, the costs associated with weeds and flammable invasive species, and the resulting potential for species loss. The viability of wildlife and rare plant populations and the cost to protect and preserve them in the face of chronic grazing degradation demands BLM's attention. If the BLM is to rise to its calling as land administrator for the public, the beauty and intrinsic value of the land, as described by Aldo Leopold, must also be addressed. ⁸⁴
S-0072-35	In accordance with its multiple use mission, the BLM must consider land uses other than grazing in its calculation of the economic and social values of each alternative, including administrative costs and environmental impacts to water, wildlife, plants, recreation, potential species loss, intrinsic land value, and beauty. Under the Taylor Grazing Act, the BLM must prevent injury to public lands. The current grazing utilization levels are unsustainable and the proposed plan must not continue grazing at unsustainable levels. Restoration of the land will require costly action by the BLM. Taking into account the overestimated costs and underestimated benefits of reducing grazing in the planning area, the BLM must provide a thorough and balanced analysis that considers the factors addressed in this comment.
S-0072-38	Forage consumption rates must be calculated based on the current weights and consumption rates of livestock in order to provide the forage needed for wildlife, plant community sustainability and watershed protection and to ensure the public trust is not violated by undercharging for the actual weights of cattle and calves grazed.
S-0072-39	Grazing privileges that are lost, relinquished, canceled, or have base property sold without transfer would have attached AUMs held for watershed protection and wildlife habitat. (Adapted from the Challis Resource Area Proposed LRMP and Final EIS, October 1998, p. 87).
S-0073-04	Collar Gulch Creek currently supports an at-risk population of genetically pure Westslope cutthroat trout that represent the eastern-most population of Westslope cutthroat trout. Given the size of this population and the limited amount of available habitat, this unique population is at risk for extirpation and any habitat degradation – or risk of degradation – is unacceptable. For this reason, MTU request that all BLM lands and subsurface minerals within the entire Collar Creek watershed be designated as an ACEC. We also request that these lands be strictly managed for non-degradation, including closing the ACEC to oil and gas leasing, mineral activity and other uses that could result in the degradation of water quality or other impacts to this irreplaceable population of native trout.
S-0073-05	The impact of oil and gas activities on Blue Ribbon and Red Ribbon (Class I and II) trout streams and the significant recreational benefits these waters provide anglers should be analyzed. Class I and II streams in the Lewistown Field Office include Big Spring Creek, Missouri River and the Smith River.

S-0073-06	MTU request that the BLM develop stipulations for oil and gas activities that protect health of Class I and II streams, as well as the quality of experience for anglers who frequent these destination fisheries. For instance, the Billings Field Office is considering the application of ½ mile NSO stipulations for both Class I and II streams. In order to protect water quality and the quality of experience that these streams provide, we request that the Lewistown Field Office adopt the same level of protection.
S-0073--07	MTU supports a ¼ mile NSO buffer for all perennial streams. Doing so would protect tributary streams that serve as spawning habitat for Class I and II streams, as well as productive trout streams that are not designated Class I or II (e.g. the Sun and Dearborn Rivers.) The effects of oil and gas development along tributaries stream can be just as harmful as the effects of the designated stream sections; after all, sediment and spills flow downstream. The only way to truly protect a fishery is to protect the entire watershed, including tributaries. Moreover, there are important warm water fisheries that might not be significant recreationally, but that have biological importance. Without a buffer for all perennial streams, these resources would lack a significant degree of protection.
S-0073-09	Stream buffers (i.e. ½ mile NSO stipulations) are linear in profile, meaning that it feasible to utilize directional drilling technologies to access all of the oil and gas that might underlie these NSO buffer areas. When evaluating the effect of stream buffers on mineral development, we suggest that BLM incorporate this principle into the environmental analysis.
S-0073-10	The environmental analysis should identify the potential impacts oil and gas development will have on fisheries, including conservation populations of Westslope cutthroat trout, impacts to streams with potential for the restoration and reintroduction of Westslope cutthroat trout, and impacts to Class I and II streams. Additionally, this analysis needs to consider that there are two potential sources of impacts from oil and gas development: 1) surface disturbances and associated erosion and sedimentation, and 2) contamination from spills and other accidental releases of chemicals and wastes associated with drilling and production and activities. Any development within a watershed introduces the risk of a spill and the resultant impacts to aquatic habitat and fisheries; these impacts can range from minimal to catastrophic depending on the severity of a given spill. The dual nature of oil and gas impacts (sediment and spills) emphasizes the need for ½ mile NSO stream buffers – the greater the spatial separation between oil and gas development and surface waters, the less chance that a spill will reach and impact a given water body.
S-0073-11	Streams and rivers throughout Montana have experienced deleterious impacts to the aquatic environment in recent drought years due to low stream flows, increased water temperatures, and/or inadequate over-wintering habitat. The environmental analysis should consider the cumulative effects of climate change and drought, including aquatic ecosystems that will be adversely impacted by climate change. By removing other stressors, vulnerable watersheds can be managed to prevent regime shifts brought on by the impacts of climate change. Reducing the effects of land use activities (e.g. applying a ½ mile NSO buffer) will help to offset the effects of climate change by increasing the resiliency of watersheds that support coldwater fisheries. Conversely, management decisions that result in a higher degree of impacts will intensify the effects of climate change.

APPENDIX H

PRELIMINARY PLANNING CRITERIA

The following preliminary criteria were developed by BLM and made available to the public during scoping:

1. The plan will be completed in compliance with the Federal Land Policy and Management Act (FLPMA) and all other applicable laws.
2. The planning process will include an environmental impact statement that will comply with the National Environmental Policy Act (NEPA) standards.
3. The plan will establish new guidance and identify existing guidance upon which the Bureau of Land Management (BLM) will rely in managing public lands within the Lewistown Field Office and the Butte Field Office (for the northern portion of Lewis and Clark County).
4. The resource management plan/environmental impact statement (RMP/EIS) will incorporate, by reference, the *Standards for Rangeland Health and Guidelines for Livestock Grazing Management for Montana, North Dakota and South Dakota*; the *Off-Highway Vehicle Environmental Impact Statement and Plan Amendment for Montana, North Dakota and Portions of South Dakota*; the *Montana/Dakotas Statewide Fire Management Plan*; *Best Management Practices for Forestry in Montana*; the *Montana Streamside Management Zone Law and Rules*, and the *Final Programmatic Environmental Impact Statement Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States*.
5. The RMP/EIS will incorporate, by reference, all prior wilderness study area (WSA) findings that affect public lands in the planning area.
6. The planning process will include early consultation meetings with the US Fish and Wildlife Service (FWS) during the development of the plan.
7. Native American Consultation and Coordination – the Blackfeet Indian Reservation is adjacent to the planning area (Pondera County). Also, other tribes located near or associated with the planning area will be contacted early during the scoping process to determine what level of participation they would like to have during the RMP process. Early consultation and close coordination will take place to see that the tribes' needs are considered, analyzed, and that the BLM fulfills its trust responsibilities.
8. Early consultation will be conducted with the State Historic Preservation Office (SHPO) on any potential effect of the plan on cultural resources under provisions of the National Historic Preservation Act of 1966, as amended (16 USC 470f) and under the National Programmatic Agreement. Relevant/interested tribal governments and the SHPO should be invited as cooperating agencies.

9. The plan will result in determinations as required by special program- and resource-specific guidance as described in BLM Manual 6280 – Management of National Scenic and Historic Trails and Trails under Study or Recommended as Suitable for Congressional Designation.
10. The plan will incorporate the requirements of BLM Handbook H-1624-1, Planning for Fluid Mineral Resources and/or updated manual/policy guidance.
11. The RMP/EIS will incorporate the requirements of the interagency reference guide entitled Reasonably Foreseeable Development Scenarios and Cumulative Effects Analysis developed by the Rocky Mountain Federal Leadership Forum on NEPA, Oil and Gas, and Air Quality.
12. The plan will recognize the State’s responsibility to manage wildlife populations, including uses such as hunting and fishing, within the planning area.
13. To the extent possible, goals and objectives in the plan for plants and wildlife (including Special Status Species) will incorporate or respond to goals and objectives from established recovery plans, conservation strategies, strategic plans, etc.
14. Decisions in the plan will strive to be compatible with the existing plans and policies of adjacent local, state, tribal, and federal agencies, as long as the decisions are in conformance with legal mandates on management of public lands.
15. The scope of analysis will be consistent with the level of analysis in approved plans and in accordance with bureauwide standards and program guidance.
16. Geospatial data will be automated within a geographic information system (GIS) to facilitate discussions of the affected environment, alternative formulation, analysis of environmental consequences, and display of the results.
17. Resource allocations must be reasonable and achievable within available technological and budgetary constraints.
18. Best management practices (BMPs) for oil and gas, road drainage, grazing, water quality BMPs for Montana forests, fire rehabilitation, fire management, wind energy, power lines, and sage-grouse conservation will be added.
19. The BLM will coordinate with the Lewis and Clark National Historic Trail (NHT), Nez Perce NHT, and the Continental Divide National Scenic Trail (NST) administrators during the land use planning process regarding the establishment of the national trail management corridors.

APPENDIX I

SCOPING REFERENCE MATERIALS

- <http://www.trails.idaho.gov/trails/>
- <https://doj.mt.gov/driving/mvd-by-the-numbers/2012-total-vehicle-registrations-statewide/>
- http://billingsgazette.com/news/state-and-regional/montana/research-grizzlies-not-so-dependent-on-pine-nuts/article_c2f5c901-65ad-5d5a-a975-f40864cbc563.html
- <http://www.fs.fed.us/recreation/programs/ohv/final.pdf>
- <http://www.usatoday.com/story/news/nation/2013/10/24/wildfires-smoke-climate-change-harmhealth/3173165/>
- <http://www.gao.gov/products/GAO-13-618>
- http://www.cta.ornl.gov/cta/Publications/Reports/ORNL_TM_1999_100.pdf
- <http://atfiles.org/files/pdf/crimminsNOHVCC.pdf>
- <http://www.americantrails.org/resources/motors/index.html>
- <http://nvtrailmaps.com/trail.php?trail=708>
- http://helenair.com/news/local/road-accessing-national-forest-land-gatedlocked/article_f9d0dbde-4655-11e2-a8d3-0019bb2963f4.html?print=true&cid=print
- http://www.youtube.com/watch?v=0kUhLMi97dg&feature=g-userlik&context=G23216abUCGXQYbcTJ33bB0U1oCKI_9bcFlhATY2tUW6mr0rdyBQc
- <http://www.marketwire.com/press-release/The-Results-Are-in-Off-Road-Vehicle-Riding-is-Good-for-Your-Body-and-Soul-1310189.htm>
- http://en.wikipedia.org/wiki/Confirmation_bias
- <http://online.wsj.com/community/groups/question-day-229/topics/should-40-million-acres-land>
- http://sciencepolicy.colorado.edu/admin/publication_files/resource-2803-2010.06.pdf
- <http://www.climate-science-watch.org>
- <http://epw.senate.gov/speechitem.cfm?party=rep&id=263759>
- <http://co2now.org/>
- <http://www.drroyspencer.com/2010/01/december-2009-uah-global-temperature-update-0-28-degree-c/>
- <http://www.telegraph.co.uk/comment/columnists/christopherbooker/5664069/Polarbear-expert-barred-by-global-warmists.html>
- http://www.fs.fed.us/recreation/programs/nvum/nvum_national_summary_fy2007.pdf
- http://helenair.com/news/article_633fdef8-6a1c-11df-8dcf-001cc4c002e0.html?print=1
- <http://www.fs.fed.us/trailsunlimited/>
- <http://www.stream.fs.fed.us>
- http://www.fs.fed.us/r1/bd/forest_plan/revision/reports_documents/social/Forest%20Social%20Assessment%20Masterfinal%20.pdf

- http://www.sltrib.com/utah/ci_4194188
- <http://www.nps.gov/yell/parkmgmt/upload/winterrec05.pdf>
- <http://www.fs.fed.us/r4/sawtooth/projects/>
- https://scholarsbank.uoregon.edu/xmlui/bitstream/handle/1794/9849/GV_191.67_T7M66_199_4.pdf?sequence=1
- <http://fwp.mt.gov/fwpDoc.html?id=24717>
- <http://www.epa.gov/wed/pages/projects/globalclimatechange/Vegetationredistribution.pdf>
- <http://www.ipcc.ch/pdf/assessment-report/ar4/wg1/ar4-wg1-chapter11.pdf>
- <http://www.mtnativeplants.org/Important%20Piant%20Areas>
- http://region8water.colostate.edu/PDF_s/Water_Wells_in_proximityNGWA_20_II.pdf
- *Dillon RMP ROD* at http://www.blm.gov/style/medialib/blm/mt/field_offices/dillon/rmp/rod.Par.10875.File.dat/ApprovedPlan.pdf “Federal Oil and Gas Leases: Opportunities Exist to Capture Vented and Flared Natural Gas, Which Would Increase Royalty Payments and Reduce Greenhouse Gases,” GAO Report, October 2012, <http://www.gao.gov/assets/320/311826.pdf>.
- “Fracking Across the United States,” *Earthjustice*, May 2011, <http://earthjustice.org/features/campaigns/fracking-across-the-united-states>
- “Gone for Good: Fracking and Water Loss in the West,” Western Organization of Resource Councils, 2013, http://worc.org/userfiles/file/Oil%20Gas%20Coalbed%20Methane/Hydraulic%20Fracturing/Gone_for_Good.pdf
- *Journal of Environmental Management* 80 (2006) 387–393, <http://www.redrockinstitute.org/uploads/PNAS.pdf> and <http://www.msnbc.msn.com/id/22998037/>
- “Montana Greenhouse Gas Emissions Rose 11% Last Decade,” *Billings Gazette*, May 14, 2013, http://billingsgazette.com/news/state-and-regional/montana/montana-greenhouse-gas-emissions-rose-last-decade/article_5fb4b015-7c73-55e5-bdd9-f05d090d94b8.html#ixzz2VHt8n32G
- “Oil and Gas Development and Greater Sage Grouse (*Centrocercus urophasianus*): A Review of Threats and Mitigation Measures,” *The Journal of Energy and Development*, 2011, http://www.wildlifescienceintl.com/WSI_Inc/Published_Works_files/35-1%20Ramey.pdf
- “Oil and Gas Leasing: Interior Could Do More to Encourage Diligent Development,” GAO Report, October 2008, <http://www.gao.gov/new.items/d0974.pdf>
- “Study of the Potential Impacts of Hydraulic Fracturing on Drinking Water Resources: Progress Report,” EPA, 2012, <http://www2.epa.gov/hfstudy/study-potential-impacts-hydraulic-fracturing-drinking-water-resources-progress-report-0>.
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- US Fish and Wildlife Service. Last updated: August 2011. "Mountain plover factsheet." Available at: <http://www.fws.gov/mountain-prairie/species/birds/mountainplover/>; Andres and Stone, 2009, p. 25; Smith and Keinath, 2004, p. 36; Carr-, in review 76 FR 27782.
- "An Archaeological Study of the Lewistown BLM District" by George N. Ruebelmann
- Appendix H of the BLM Alaska *Ring of Fire Proposed RMP/Final EIS*
- Audubon IBAs, FWS Rocky Mountain Front Conservation Area, Montana State Wildlife Action Plan all identified in Wildlife section
- Backcountry Conservation Area (BCA) definition: The Backcountry Conservation Area is an administrative designation or emphasis area for identifiable areas of public lands that are generally intact, generally undeveloped, contain priority fish and wildlife habitat, and provide dispersed outdoor recreation opportunities.
- Conducted in accordance with BLM Manuals 6310 and 6320 in order to reflect the new inventory process.
- *Bighorn Basin RMP Revision*
- *Buffalo RMP Revision*
- *California-Nevada RMP Amendment*
- "Fire Regimes on the Pine Butte Swamp Preserve, Montana" - Contract Final Report for The Nature Conservancy written by Stephen W. Barrett, Consulting Research Forester in December 1999
- Forest Service Manual (FSM2542) defines Municipal Supply Watersheds to include: "surface supply watersheds, sole source aquifers, and the protection zones around wells and springs." In Montana, protection zones are known as Inventory Regions.
- *HiLine RMP Revision*
- *Idaho and Southwestern Montana Subregional Greater Sage-Grouse RMP Amendments*
- *Lander RMP Revision*
- *Miles City RMP Revision*
- National Wildlife Federation v. BLM, No. UT-06-91-01 US Department of the Interior, Office of Hearings and Appeals, Hearings Division (Rampton, J., 1993), p. 23, the "Comb Wash Allotment" decision.
- *Nevada-Northeast California RMP Amendment*
- *NW Colorado RMP Amendment*
- Pine Butte Peatlands nomination "Prosperity in the 21st Century West – The Role of Protected Lands" - Report by the Sonoran Institute
- Rapid Ecoregional Assessment
- Rocky Mountain Front Heritage Act
- *South Dakota RMP Amendment*
- *Upper Missouri River Breaks National Monument, Charles M. Russell National Wildlife Refuge and the Flathead National Forest plans*
- US Fish and Wildlife Service's 2011 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation

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The following scoping comment web links were inaccessible:

- <http://www.nohvcc.orhttp://www.marysvale.org/>
- http://helenair.com/news/state-and-regional/locked-gates-prevent-access-to-nationalforest/article_0428b09d-0fa2-516c-a989-e5738c8aee9a.html?print=true&cid=print
- <http://www.greatfallstribune.com/article/20110824/NEWS01/108240302/National-road-trail-reme>
- <http://www.sepp.org/Archive/NewSEPP/LttrtoPaulMartin.html>
- <http://billingsgazette.net/articles/2008/12/04/features/outdoors/18-woods.txt>
- http://www.fs.fed.us/t-d/programs/wsa/pdfPubs/road_bmp.pdf
- <http://www.sharetrails.org/magazine.cfm?story=705>
- <http://www.kscourts.org/ca10/datefile/datefile.htm>
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- http://www.blm.gov/pgdata/etc/medialib/blm/ut/vemal_fo/planning/gasco_eis/gasco_folder_6.Par.I.0452.File.dat/28_Gasco%20Appendix%200.%20Long-term%20Water%20Monitoring%20Pian.pdf
- US Global Change Research Program, <https://www.epa.gov/RDEE/energy-resources/calculator.html>
- Water Erosion Prediction Project Model (WEPP), a web-based interface at <http://www.ars.usda.gov/Research/docs.htm?docid=18084&pf=l>
- <http://ftp.fao.org/docrep/fao/010/a0701e/a0701e00.pdf>