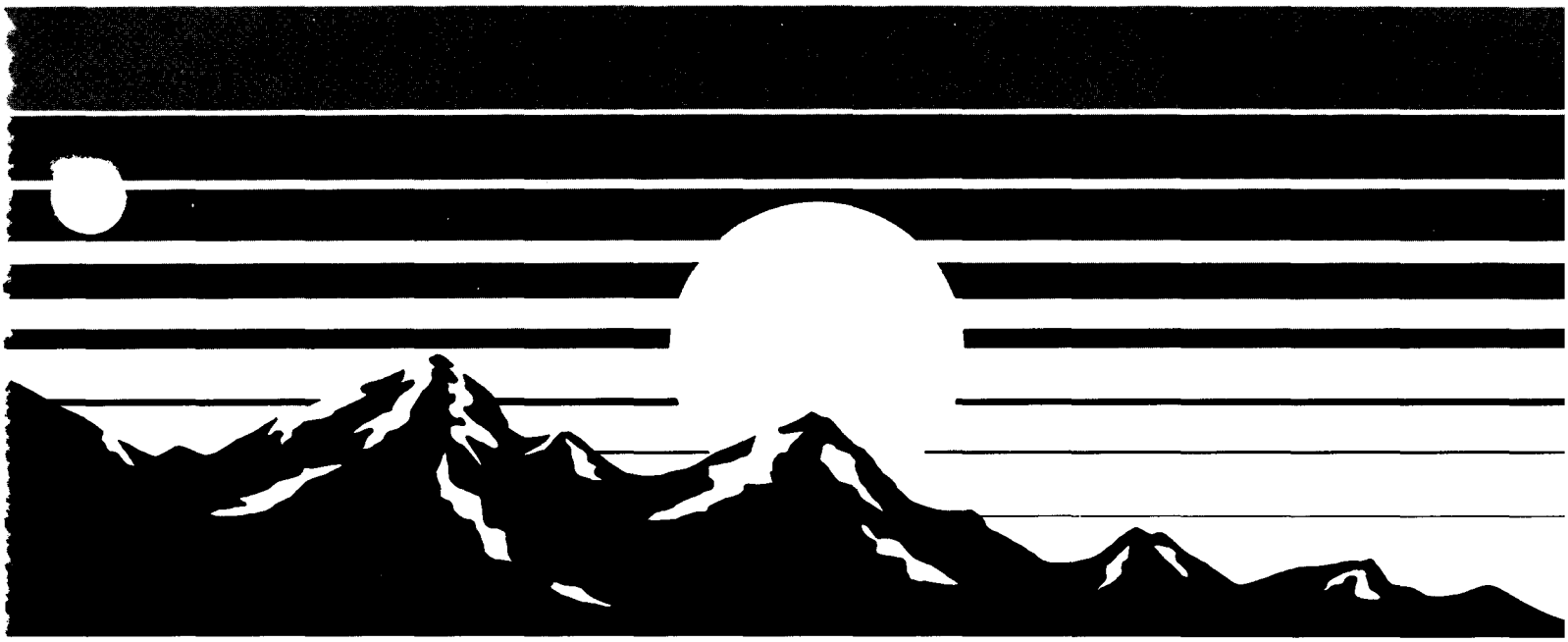

ANALYSIS AND REVIEW PROCEDURES

A total of eighty-nine individuals, private organizations, and federal, state, and local agencies submitted comments on the recommendations and/or analysis contained in the Headwaters Draft RMP/EIS. Of this total, thirty-two comments were received solely in response to the Headwaters Land Ownership Adjustment map which was mailed concurrent with, but separate from, the RMP/EIS document. Oral statements were presented by five individuals, agencies, or organizations at the RMP/EIS hearing in Helena, Montana; two of these were accompanied or followed up by written comments.

Most of those submitting comments were concerned with land ownership adjustments, grazing allotment and riparian habitat management, wilderness recommendations, oil and gas leasing and development, and forest management. Several commentors also voiced significant concerns about procedural matters, including compliance with the CEQ and BLM planning regulations. Table 7-1 shows the number of contributors by issues or resource.

All comments will be available for inspection at the Headwaters Resource Area office in Butte. In addition, all wilderness comments will accompany the BLM Montana State Director's wilderness recommendations to Washington for consideration by the BLM Director, the Secretary of the Interior, the President, and Congress.

COMMENTS AND RESPONSES

All comments were reviewed and considered. Table 7-3 shows the responses to comments that:

- relate to inadequacies or inaccuracies in the analysis or methodologies used,
- identify new significant impacts,
- recommend reasonable new alternatives,
- involve disagreements on interpretations of significance, or
- indicate significant misconceptions or misinterpretations of BLM programs and policies.

Each letter and each person who testified at the hearing was given an index number (Table 7-2). These index numbers were used in Table 7-3 to identify the comment contributors.

The comments and responses are arranged by topic in Table 7-3. Except for editing of misspelled words or obvious errors in punctuation, most comments are printed verbatim. In many cases, credit for the same comment was given to several contributors. The response to a comment either identifies that a change was made or provides rationale for why a change was not considered necessary. Editorial corrections were made either in the text or in the Errata, Appendix U, if appropriate, but were not responded to in Table 7-3.

Appendix V displays the comment letters received in response to the draft RMP/EIS. Letters received solely in response to the Headwaters Land Ownership Adjustment map were not printed because most consist of notes written on the margins or back of the map and are not reproducible in a document of this format.

TABLE 7-1
NUMBER OF CONTRIBUTORS BY ISSUE OR RESOURCE

Issue or Resource	Number of Contributors[1]
Oil and Gas Leasing Development	13
Grazing Allotment and Riparian Habitat Management	9
Wilderness Study Recommendations	14
Forest Management	9
Land Ownership Adjustments	53
Mineral Exploration and Development	5
Motorcycle Use Areas	6
Motorized Vehicle Access	6
Utility and Transportation Corridors	0
Coal Leasing	5
Special Designations	8
Soil, Water, and Air Resources	3
Wildlife and Fish Resources	8
Recreation, Visual, and Cultural Resources	6
Social and Economic Considerations	1
Weed Control	1
Fire Management	1
General	9

[1]These numbers cannot be added to total eighty-nine because many commentors addressed more than one issue or resource.

TABLE 7-2
LIST OF CONTRIBUTORS

Index Number	Contributors
	Federal Agencies
1	Advisory Council On Historic Preservation, Washington, D.C.
2	Department of Agriculture, Forest Service, Missoula, MT
3	Department of the Air Force, Air Force Regional Civil Engineer, Dallas, TX
4	Department of the Army, Omaha District Corps of Engineers, Omaha, NE
5	Department of the Interior, Bureau of Mines, Spokane, WA
6	Department of the Interior, Fish and Wildlife Service, Billings, MT (dated 7/15/83)
7	Department of the Interior, Fish and Wildlife Service, Billings, MT (dated 7/19/83)
8	Department of the Interior, National Park Service, Denver, CO
9 *	Department of the Interior, National Park Service, Omaha, NE
10	Department of Transportation, Federal Highway Administration, Denver, CO
11	Environmental Protection Agency, Denver, CO
	State Agencies
12	Montana Historical Society, Historic Preservation Office, Helena, MT
13	State of Montana, Office of the Governor, Helena, MT
	Local Agencies
14	Lewis and Clark County, Board of County Commissioners, Helena, MT (written and oral)
15	Teton County Conservation District, Choteau, MT
	Organizations
16	Atlantic Richfield Company, Denver, CO
17	Chevron, U.S.A. Inc., Denver, CO
18	Conoco Inc., Washington, D.C.
19	Continental Divide Trail Society, Bethesda, MD
20	Defenders of Wildlife, Missoula, MT
21	Great Bear Foundation, Missoula, MT
22 *	Helena Trail Riders, Helena, MT
23	Inland Forest Resource Council, Missoula, MT (oral)
24	Minerals Exploration Coalition, Denver, CO
25	Montana Audubon Council, Helena, MT
26	Montana Farmers Union, Great Falls, MT (oral)
27	Montana 4 x 4 Association, Inc., Dillon, MT
28	Montana Wilderness Association, Helena, MT
29	Montana Wildlife Federation, Helena, MT (oral)
30	National Wildlife Federation, Northern Rockies Natural Resource Center, Missoula, MT
31	National Wildlife Federation, Regional Executive, Bozeman, MT
32	Natural Resources Defense Council, Inc., Public Lands Institute, Denver, CO
33	Natural Resources Defense Council, Inc., Western Office, San Francisco, CA
34	Plum Creek Timber Company, Inc., Missoula, MT
35	Rocky Mountain Oil and Gas Association, Inc., Denver, CO
36	Shell Oil Company, Houston, TX
37	Sunny Vista Homeowners Association, Helena, MT
38	Superior Oil, Denver, CO
39	The Bob Marshall Alliance, Missoula, MT
40	Wildlands and Resources Association, Great Falls, MT

Individuals

41 ✲ Harry Albright, Townsend, MT
42 Milton L. Allen, Albany, NY
43 ✲ Charles R. Aumell, Helena, MT
44 ✲ Todd Barth, Billings, MT
45 Jerry Berner, Loma, MT
46 Bruce Bowler, Boise, ID
47 ✲ Michael and Diane Brook, Broadview, MT
48 ✲ Robert Bushnell, Helena, MT
49 Barbara Charlton, Helena, MT
50 David and Linnie Cough, Helena, MT
51 ✲ John Dilley, Missoula, MT
52 ✲ Jack B. Gehring, Helena, MT
53 ✲ Kenneth H. Gleason, Choteau, MT
54 ✲ H.B. Gloege, Helena, MT
55 Mortimer L. Hart, Butte, MT
56 Dan Heinz, Butte, MT (oral and written)
57 ✲ Kristi K. Humphrey, Billings, MT
58 ✲ Melvin and Betty Humphrey, Helena, MT
59 ✲ Terry and Mary Humphery, McCleary, WA
60 ✲ Thad and Kristin Humphrey, Billings, MT
61 ✲ Norman Johnson, Long Beach, CA
62 Mildred Leonard, Cambridge, MA
63 Tom Literski, Helena, MT
64 ✲ Walt Livingston, Fort Harrison, MT
65 ✲ Cary B. Lund, Helena, MT
66 ✲ Anna McLane, Helena, MT
67 ✲ Charles E. McLane, Helena, MT
68 ✲ W.E. McLane, Helena, MT
69 ✲ Arthur R. McLaren, Winston, MT
70 ✲ (unknown) McLaren, Winston, MT
71 ✲ Robert Marks, Clancy, MT
72 Susan L. Marsh, Bozeman, MT
73 Everett H. Newman, Choteau, MT
74 Gloria O'Connell, Helena, MT
75 ✲ W. Pat Pardis, Shelby, MT
76 William V. Peterson, Litchfield, MN
77 James Phelps, Billings, MT
78 ✲ Jim and Hal Plummer, Toston, MT
79 ✲ Mrs. Kenneth Poore, Great Falls, MT
80 Charles W. Proff, Dutton, MT
81 ✲ Madeline W. Rands, Choteau, MT
82 Reed Secord, Lighthouse Point, FL
83 John R. Swanson, Berkeley, CA
84 Ethel W. Thorniley, Detroit, MI
85 Richard Waltner, Billings, MT
86 ✲ George D. Warn, East Helena, MT
87 ✲ Sharon M. Warn, East Helena, MT
88 ✲ Russell and Sue Weingartner, Canyon Creek, MT
89 ✲ Robert Woods, Mountain Lake Terrace, WA

✲Indicates letters received solely in response to the Headwaters Land Ownership Adjustment map.

OIL AND GAS LEASING DEVELOPMENT

COMMENT	RESPONSE
1. The plan identifies significant resource issues on land lying within 2 to 3 miles of the north boundary of Yellowstone National Park. Oil and gas leasing and lease application activity is ongoing on National Forest lands immediately adjacent to those lands on and near the park boundary. However, oil and gas leasing, a significant issue to Yellowstone, has not been identified in the plan. If oil and gas leasing occurs near Yellowstone National Park, we request that the final environmental impact statement discuss and analyze impacts on air quality, groundwater, and wildlife habitat (including that of the threatened grizzly) in the Yellowstone ecosystem. [Comment Index Number: 8]	1. Oil and gas leasing and development was not identified as an issue for the Yellowstone area because of the minimal BLM-administered land in the area and because of the low potential for future oil and gas exploration activity. The nearest federal mineral estate administered by the BLM is approximately fifteen miles northwest of Gardiner, Montana. Most of the BLM land adjacent to the Gallatin National Forest has been identified as requiring special oil and gas leasing stipulations primarily to protect seasonally important big game habitat. Oil and gas leasing decisions for lands immediately north of Yellowstone National Park are based on the recommendations of the Gallatin National Forest, which currently is preparing a Forest Plan similar in scope to the Headwaters RMP.
2. To quantify the implications which the four alternatives and current management practices have for energy and minerals, we employed the RMOGA evaluation matrix to assess the development opportunities which would be foregone under each course of action (see attachment). This analysis highlights the impact of contemplated restrictions on the potential for resource development, with the Preferred Alternative yielding a figure which is 72% of the exploration opportunity in the Resource Area if only standard stipulations were applied. This compares with a percentage of 80% for the production alternative and, somewhat surprisingly, a figure of 86% for current management practices. This analysis demonstrates that the so-called resource production option is actually more restrictive than present management. This impact is felt principally because of the restrictive stipulations recommended for areas of highest oil and gas potential. [Comment Index Number: 16]	2. Many existing oil and gas leases along the Rocky Mountain Front were issued in the early 1970's prior to the passage of the Endangered Species Act of 1973. Stipulations presently needed to meet the minimum requirements of the ESA, even in the resource production alternative, account for most of the increase in restrictions over present management.
3. We are also concerned over what appears to be an implicit assumption in the Headwaters RMP; that oil and gas exploration cannot be undertaken without having severe negative impacts on an area's wildlife habitat and populations. At its Sheep Mountain facility in Colorado, Atlantic Richfield has demonstrated that it can operate a gas field in an area that has been designated as critical elk winter and calving range without having adverse impacts. In fact, studies by ARCO and the Bureau of Land Management have shown that the elk herd in this area is increasing annually. Clearly, an implicit assumption that wildlife and oil/gas exploration are incompatible, which ignores the environmental sensitivity of modern industry practices, should not influence the allocation of resources on our public lands. [Comment Index Number: 16, 17, 36, 38]	3. The restrictions on oil and gas activities proposed in the preferred alternative are considered necessary to protect a wide range of highly significant surface values, particularly along the Rocky Mountain Front. These values include scenery and open space as well as habitat that supports a diverse array of sensitive wildlife species—elk, mule deer, grizzly bear, bighorn sheep, mountain goats, and potentially, the gray wolf. The preferred alternative does recognize the compatibility of wildlife and oil and gas exploration on approximately 388,708 acres of public land in the Resource Area where special (seasonal) stipulations are considered adequate to protect important wildlife values.
4. We encourage the BLM to reconsider the proposed imposition of additional regulatory controls on the areas of high oil and gas potential. While the Preferred Alternative claims that ONA designation is intended to preserve future management options while providing full protection for surface values, the proposed access restrictions could effectively deny us the opportunity to explore and develop the oil and gas resources along the Rocky Mountain Front. [Comment Index Number: 16, 17, 35]	4. The impacts of proposed access restrictions on oil and gas activities within Outstanding Natural Areas are recognized in the RMP/EIS. However, the majority (72%) of public land along the Rocky Mountain Front will remain available for oil and gas exploration and development. The statement that ONA designation "is intended to preserve future management options" refers to the added flexibility such designations permit when compared to wilderness designations, as discussed under Impacts on Energy and Minerals on page 111 of the Draft RMP/EIS.

TABLE 7-3 (cont.)

OIL AND GAS LEASING DEVELOPMENT

COMMENT	RESPONSE
5. We note that the Rocky Mountain Front study areas are recommended for ONA designation. Because of the unarguable high petroleum potential along the front we agree with this approach inasmuch as ONA designation does not carry the penalty of absolute withdrawal that Wilderness designation does. We note, however, your statement that ONA designation will, in your words, provide "essentially the same level of protection that Wilderness designation would provide." ONA protective stipulations being a discretionary matter we hope that, in the event this alternative is taken, you will recognize that oil and gas exploration and production are proveably both brief and reparable. [Comment Index Number: 18, 36]	5. The preferred alternative recognizes that the impacts of oil and gas exploration and production are brief, reparable, and tolerable for 72% of the public lands along the Rocky Mountain Front and 93% of all public land within the Headwaters Resource Area. However, the proposed plan establishes that, once existing leases expire, Outstanding Natural Areas will be managed similar to wilderness insofar as no surface occupancy nor motorized vehicle access will be permitted in such areas.
6. Surface occupancy should not be allowed in T16N, R6W, Sec. 32, even though the power line there already represents a substantial intrusion. Section 33 is also sensitive, though not directly on the Continental Divide or the likely Trail route. (See *Guide to the Continental Divide Trail*, vol. I: Northern Montana at 135.) [Comment Index Number: 19]	6. A prohibition on surface occupancy for all of Section 32 (T16N, R6W) is not considered necessary for the protection of the Continental Divide Trail route. Standard stipulations, including the Controlled or Limited Surface Use Stipulation, provide adequate control over the location of surface use and occupancy for situations where the actual location of sensitive resources, such as the Continental Divide Trail route, have not yet been determined.
7. The amount of acreage suggested for no leasing and no surface occupancy in the preferred alternative is simply not enough to adequately protect the grizzly or wolf. As the Fish and Wildlife Service noted in its biological opinion on the Rocky Mountain Front plan several years ago, simultaneous development in adjacent drainages could jeopardize both the grizzly and the wolf. The Bureau needs to adopt a plan that takes into account such a possibility. [Comment Index Number: 20, 30]	7. The preferred alternative effectively eliminates the possibility of oil and gas activities taking place simultaneously in adjacent drainages, to the extent permitted by land ownership patterns along the Rocky Mountain Front (see page 124 of Draft RMP/EIS). Pursuant to Section 7 of the Endangered Species Act, as amended, formal consultation with the Fish and Wildlife Service (FWS) has been initiated for the Headwaters RMP to determine the likelihood of jeopardy to the grizzly bear and other threatened and endangered species if the proposed plan is implemented. The results of this consultation will be used in preparing a Record of Decision for the Headwaters RMP and in developing site-specific activity plans necessary for RMP implementation. The BLM will continue to consult with the FWS and the Montana Department of Fish, Wildlife, and Parks for individual actions that may affect habitat for threatened and endangered species (see page 28 of Draft RMP/EIS).
8. The Bureau should identify those lands that are critical to these species (grizzly bear and gray wolf) and place them in a no leasing or no surface occupancy category. It would appear that Alternative C comes much closer to fulfilling the BLM's obligation to protect and enhance the habitat of endangered species. The preferred alternative seems like a minimal effort, geared toward keeping the grizzly from becoming endangered, rather than what's mandated by the Endangered Species Act—recovery. [Comment Index Number: 20, 21, 28, 30, 40]	8. Important grizzly bear habitats are all identified for no surface occupancy or no leasing under the preferred alternative. Key big game winter ranges important to the recovery of the gray wolf are similarily protected. While Alternative C does provide more protection for grizzly bear and gray wolf habitat, Alternative A is preferred because it would allow a higher level of oil and gas exploration and development while still providing opportunities for the recovery of these species. See also response to Comment Number 7 in this section.
9. Further, the lease stipulations presented on pages 208 and 209 should be rewritten to protect key habitat even in the event of oil and gas discovery. As they now stand, protections are afforded ony so long as oil and gas are not found. In any event, grizzly bear and grey wolf habitat should receive high priority and be improved with all due haste in accordance with the provisions of the Endangered Species Act. [Comment Index Number: 30]	9. While the stipulations referenced apply only to exploration and development activities, the BLM can and does restrict the timing of production activities in sensitive areas. The stipulation form (MSO 3100-49) that is used to identify seasonal restrictions on production was omitted from the draft RMP/EIS but has been included in the final document (see Appendix B). The preferred alternative identifies portions of the Rocky Mountain Front where seasonal production stipulations would be applied. See also response to Comments Number 7 and 8 of this section.

OIL AND GAS LEASING DEVELOPMENT

COMMENT	RESPONSE
10. In any alternative selected in this plan, two critical points should be addressed: (1) In what way will the agency gather information in order to adequately evaluate the energy and mineral resource potential within the planning areas, and (2) In areas where there is moderate to high potential for deposits of energy or minerals, how is the agency going to develop land use allocations which will be compatible with possible exploration for the development of these resources. [Comment Index Number: 36]	10. Information on the evergy and mineral resource potential in the Headwaters Resource Area was obtained from willing companies and individuals active in the area and, in the case of areas being studied for wilderness, from Geology, Energy, and Mineral (GEM) reports prepared under contract for the BLM. Additional information was provided by the U.S. Geological Survey, U.S. Bureau of Mines, and the Montana Bureau of Mines and Geology. The energy potential of the Rocky Mountain Front is assumed to be uniformly high. See also responses to Comments Number 3 and 5 in this section.
11. Seasonal Exploration Restrictions: Table 2-2 indicates that an area that is both a Grizzly Bear spring and summer range and a Elk and Mule deer winter range would have seasonal restrictions during the period 12/1-9/1. This would allow unrestricted work only during the period 9/1-12/1. This would, in many cases, be a stipulation that would make work on a lease impossible. If the seasonal restrictions were such that certain types of activities were allowed during the period 12/1-9/1, then the impact of this potential problem would be lessened. [Comment Index Number: 38]	11. The seasonal wildlife restrictions identified in Table 2-2 are considered necessary for the protection of important wildlife species. The restrictions for grizzly bear spring and summer range and elk and mule deer winter range, in particular, are considered essential for avoiding a jeopardy situation for the grizzly bear and gray wolf, respectively, under the Endangered Species Act. The amounts of public land within the Headwaters Resource Area likely to be affected by such overlapping seasonal restrictions (12/1-9/1) is approximately 14,000 acres, all of which is located along the Rocky Mountain Front. In practice along the Front, ninety days have provided an adequate drilling period for the typical holes drilled to date. Actual on-the-ground conditions, including weather and wildlife movements, will govern whether or not such seasonal restrictions can be modified should problems develop during work on a lease.
12. Seasonal Production Restrictions: Producing wells generally require daily attention in almost all cases and need periodic major work to keep them producing safely and efficiently. The seasonal restrictions placed on a lease must allow for work of this type. Acceptable restrictions might be to limit visits to daytime hours only and limit the number of vehicles and/or people allowed at a producing well at any one time. If occupancy of this nature is not allowed, then leases would probably not be attractive for exploration or development. [Comment Index Number: 38]	12. The RMP does not identify specific guidelines which will be applied to producing wells and other facilities; such guidelines will be developed on a case-by-case basis at the time of lease issuance or, in some cases, at the time of application for a permit to drill or in response to a sundry notice. Careful attention to the location of production facilities will be important in minimizing seasonal conflicts. However, it may be necessary to limit visits to wellheads located in more sensitive areas.
13. Existing leases: I think the Impact Statement should make a strong statement that existing leases within the area described are not subject to the surface occupancy and lease stipulation, nor any other statements described in the Draft Statement. [Comment Index Number: 38]	13. A statement to this effect has been added to the "Management Guidance Common to all Alternatives" section. This statement also discusses some of the implications of production and unit formation on the proposed stipulations.

TABLE 7-3 (cont.)

GRAZING ALLOTMENT AND RIPARIAN HABITAT MANAGEMENT

COMMENT	RESPONSE
1. Under the preferred alternative (Alternative A), seeding and interseeding is proposed for 2,560 acres. On page 118 of the draft, we note that the BLM is proposing to utilize native and introduced plants. We are very concerned if the introduced species to be utilized is crested wheatgrass. This type of conversion results in monotypic vegetation, essentially useless to wildlife. [Comment Index Number: 6]	1. Areas for reseeding and interseeding will be carefully mapped during activity plan development. The type of seeding proposed will be designed to fit the site being treated and accomplish the management objective stated for the allotment. Some crested wheatgrass seedings may be prescribed, but this plant is not viewed as a "cure-all." If properly managed and located, crested wheatgrass seedings can be used to accomplish multiple use objectives, including increasing early spring forage values for mule deer and antelope. It should be noted that the total treatment acreage proposed in Alternative A involves less than 1% of the resource area and is not confined to one location. Standard BLM range seeding practices include the use of native species (and taxonomic equivalents) whenever possible. Finally, wildlife habitat is afforded protection and/or mitigation through the use of a standard seeding prescription process that includes interdisciplinary review and consultation with the Montana Department of Fish, Wildlife, and Parks.
2. Regarding range reseeding, on page 237 (item #11) the draft states that all areas where vegetative manipulations are to occur will be rested at least two years after treatment. It has been our experience (and we recommend) that these areas should be rested for three growing seasons, to obtain good ground cover, plant vigor and wildlife habitat. [Comment Index Number: 6]	2. Two years growing season rest is a common recommendation. If the seeding is not ready for grazing use after two years rest, further deferment will be provided.
3. We recommend that during preparation of the Final EIS, more adequate attention be given to wetland-riparian habitat protection needs, especially regarding the time over which protective measures are to be implemented. According to the draft, the proposal is to improve 58.5% (22.6 miles) of the unsatisfactory riparian habitat on priority 1 allotments over a period of 20 years; another 20 years would presumably be required to improve the 29.5% (11.3 miles) of unsatisfactory riparian habitat on priority 2 allotments. Thus, forty years would be required to reach the desired goals. The issue of moose habitat (page 126) emphasizes our concern that not enough is being done soon enough to protect riparian habitat. Under Alternative A, moose habitat would only improve from 40% unsatisfactory to 34% unsatisfactory; only four of twelve allotments containing moose habitat would improve, the remaining eight would experience little change. Therefore, we recommend that the scheduling required to implement the AMP goals for riparian habitat be shortened significantly because of its importance to both wildlife and water quality. [Comment Index Number: 6]	3. The I category allotments have been reprioritized for implementation in accordance with current BLM grazing management policy (Appendix E). It is realistic to assume that two AMPs per year for the next twenty years can be implemented. Of the forty highest ranking I allotments, twenty-two contain approximately thirty miles, or 78% of the total unsatisfactory riparian habitat in the resource area. The thirty-seven lower ranking I allotments contain approximately four miles, or 10% of the total unsatisfactory riparian habitat. The remaining four and three-quarters miles, or 12%, of unsatisfactory riparian habitat are in the maintenance and custodial category allotments. In summary, Alternative A, as revised, provides for significant improvement of riparian habitat in a resource area where 72% of all riparian habitat is already in satisfactory condition. The reason for the relatively small improvement in winter-spring moose habitat condition under Alternative A is that the majority of this habitat occurs on two allotments where limited opportunity exists for development of grazing systems that are compatible with improving moose winter-spring habitat. In the case of the Muskrat Allotment (0249), periodic exclusion of livestock grazing may be employed if wildlife/livestock conflicts cannot be resolved through the development of grazing systems.

GRAZING ALLOTMENT AND RIPARIAN HABITAT MANAGEMENT

COMMENT	RESPONSE
4. Given that more than a fourth of the riparian habitat in the Resource Area is in unsatisfactory condition (and particularly since much of this is critical grizzly habitat), Defenders of Wildlife supports the proposal to improve this situation. It's not clear from the plan that correcting this situation has been given a high enough priority in the plan. It would seem those areas with large percentages of riparian in unsatisfactory condition (particularly if they're in grizzly areas) should be the highest priority I areas. I also find it unacceptable that the unsatisfactory riparian areas in the M and C categories won't be improved. [Comment Index Number: 20]	4. Additional information has been provided in Appendix M that displays resource information considered in the determination of M, I, and C classifications for all allotments in the resource area. The classifications are the result of an interdisciplinary effort at identifying the most important priorities for future BLM management actions. These classifications are subject to revision based on new information acquired through monitoring and benefit/cost analysis. Management actions and funding of improvements can occur for M or C allotments but will be of lower priority than I allotments. For those M and C allotments within identified habitat for gizzly bear, our resource information indicates that none of the riparian habitat is in need of significant improvement. The Headwaters RMP/EIS does place high priority on riparian habitat improvement. The extensive time frames involved in such improvement are a result of anticipated staffing and budget constraints for AMP development. In prioritizing I allotments, both grizzly bear (and other threatened and endangered habitat) and riparian habitat were given high ranking and priority. All allotments containing key grizzly bear habitat, except one, are I allotments. The one exception is an allotment in which all grizzly bear and riparian habitat is in excellent condition (Allotment 6308). All allotments with extensive riparian habitat in unsatisfactory condition are I allotments. Most M and C allotments either lack riparian habitat or contain satisfactory riparian habitat. In general, M and C allotments also have limited management opportunities for improving habitat condition.
5. On the issue of grazing, we found almost no details in the draft of how grazing will be managed for the benefit of wildlife. The inference made is that bettering the range condition will increase wildlife benefits. Although we too believe that wildlife can benefit from bettering the range condition, we feel that other issues must also be considered to determine whether wildlife resources will receive any net benefits. Often times the range improvements (water, fencing, grazing systems) associated with intensive management have substantial negative impacts. For example, one ramification of intensive management is the intrusion of livestock into areas that previously were not utilized because of lack of water. After water developments are installed, livestock/wildlife competition will be spread over a broader area than was previously possible. Another impact is the often intensive utilization of forage in one or more of the pastures in a grazing system which leaves little or no residual cover for wildlife in these pastures. We feel these, as well as other pertinent issues, must be discussed in the final EIS before the assertion can be made that the proposed grazing management will benefit wildlife. As written, the draft does not discuss the negative implications of intensive management. Inasmuch as the draft indicates that grazing income to the U.S. Treasury from public lands in the Headwaters is about $58,000 and that wildlife related resources, through hunter-day use, result in $255,000 of economic stimulation, it appears that more attention should be given to addressing the impacts of grazing upon wildlife. [Comment Index Number: 6]	5. RMP-level guidance for wildlife habitat and livestock management can be found in the Draft RMP/EIS under Management Guidance Common to All Alternatives (pp. 25-29); in Appendix E, which discusses allotment-specific opportunities, conflicts, and objectives for wildlife; and in Chapter 4 (pp. 124-126), which identifies possible mitigating measures applicable for wildlife species. The RMP proposes to resolve livestock grazing/wildlife habitat conflicts in a variety of ways, including grazing system design; direct allocations to wildlife; establishment of utilization levels; decreasing livestock forage allocations; changing class or kind of livestock use or season of use; changing livestock distribution through salting, water development, or fencing; limited treatments, including seedings; and the use of deferred or rest-rotation grazing systems. Improving vegetative condition to a higher seral stage will result in a corresponding habitat change better suited to a higher climax wildlife population. As Alternative C makes clear, however, changing vegetative condition to lower seral stages can also be beneficial to wildlife. The relationship of vegetative condition to wildlife habitat condition is complex, depending on the wildlife species involved, the vegetative types being considered, and the primary season(s) of wildlife use. It should also be noted that unsatisfactory wildlife habitat conditions are not always the result of livestock grazing. Only where livestock cause or contribute to the problem can unsatisfactory conditions be corrected by changes in livestock management. In summary, considering present resource conditions in the resource area, the RMP provides the level of guidance needed to resolve the livestock management issue in a way that balances the needs of wildlife, watershed, and the livestock industry. Further details will be established during activity planning, at which time specific range improvements, treatments, grazing systems, and other appropriate actions will be analyzed by an interdisciplinary team through site-specific environmental analyses.

TABLE 7-3 (cont.)

GRAZING ALLOTMENT AND RIPARIAN HABITAT MANAGEMENT

COMMENT	RESPONSE
6. Monitoring of range conditions and trends will be very important in the Headwaters Resource Area, because 20,173 acres of grazing lands have not been inventoried and only 10 allotment Management Plans are now in existance. The BLM should conduct range surveys on the 20,173 unsurveyed acres whenever possible. [Comment Index Number: 13]	6. It is agreed that future monitoring of range conditions and trends is important. Some of the 20,173 acres not inspected in the most recent vegetative inventory are ungrazed. The monitoring plan will specify how and when the remaining grazed tracts will be inspected for range condition.
7. The BLM did not provide projected percentages of expected improvements in range conditions over the entire resource area. By not providing this information the question of the cost-benefits of their objectives arises. A time frame for implementation should be provided to give credence to their objectives. Without these answers the cost benefits of their objective can be unrealistic. [Comment Index Number: 13]	7. Projected changes in range condition were discussed in Chapter 4 of the Draft RMP/EIS (see pp. 117, 135, 142, and 151). In the process of allotment categorization, several factors were considered, including present range condition and potential for improvement. Those allotments that were tentatively identified in the I category as a result of this process reflect greater needs and opportunities for range improvement than do the M and C allotments. Accordingly, the I allotments also reflect the highest priorities for implementing the objectives of the RMP. Those improvements in range and riparian condition that are projected to meet specific objectives for I allotments are judged to be reasonable for the life of the RMP. As more detailed planning takes place with regard to specific range improvements for particular allotments, further benefit-cost comparisons will be made. Priorities have been developed for implementation of specific allotment management plans (AMPs) but time frames for the completion of the necessary range improvements required to implement these AMPs are subject to annual budget capabilities.
8. Changes in lessee management is not discussed. If management is retained with the operator, will objectives be accomplished on a wide scale? This should be addressed in the Final RMP. [Comment Index Number: 13]	8. As RMP objectives for a particular allotment are accomplished, management classifications (M, I, C) will be adjusted as appropriate in consultation with the Grazing Advisory Board and the individual range users. When a new grazing operator assumes management of a particular allotment, the same established RMP objectives will apply. Some changes in specific grazing practices can usually be accommodated for the new operator while meeting the same established resource objectives.
9. The State is concerned about possible substantive negative impacts to certain grazing permittees under the preferred alternative. The DEIS cites a 5-year horizon for phasing in livestock reductions. The State believes that where proposed actions threaten the viability of the livestock operator that every effort should be made to ameliorate this situation. The BLM might consider extending time frames, scaling down the proposed decrease in AUMs, helping locate alternate public rangelands or implementing more intensive management plans on these allotments. [Comment Index Number: 13]	9. Current BLM policy for phasing in livestock forage adjustments, including reductions, is summarized on p. 25 of the Draft. Under the circumstances existing within the resource area, it does not appear that the viability of any livestock operator is threatened; present BLM policy for phased in reductions concurrent with monitoring studies should largely mitigate these impacts to individual ranches.
10. The State has read with great interest the new Cooperative Management Agreement (CMA) program for selected livestock operations on the public lands. The sketchy details received to date indicate that only those permittees whose allotment is in the "M" (maintain) category will be eligible. Appendices D and E of the DEIS show that many allotments are in good repair in terms of vegetation and riparian areas, yet are categorized as "I" (improve) allotments solely for wildlife reasons. How does the BLM reconcile the seeming penalty of ineligibility for the CMA program for the livestock operators in these instances? [Comment Index Number: 13]	10. Current BLM policy directs that the Cooperative Management Agreement (CMA) program be initiated on M allotments. The policy also appears to permit CMAs for I and C allotments if, in the future, the operator demonstrates good stewardship practices.

GRAZING ALLOTMENT AND RIPARIAN HABITAT MANAGEMENT

COMMENT	RESPONSE
11. In grazing allotments targeted for a short term decrease in AUMs, the grazing permittee should receive consideration in the allocation of any long term increased forage production. , [Comment Index Number: 13]	11. This is currently a provision of the grazing regulations.
12. One thing we don't understand has to do with the protection alternative that we support, and that is that there seems to be a very reduced federal commitment to financial enhancement of grazing allotments in that alternative. That is to say, the preferred, the no action, and the resource production alternatives all anticipate grazing allotment financial enhancements in the neighborhood of four hundred forty-two thousand to forty-nine thousand dollars. For some unexplained, as I can see, reason, the financial enhancements for Alternative C, the protection alternative, are almost half, a little bit more than half, or two hundred forty-eight thousand dollars. We don't see the logic behind that reduction and we don't see any connection really between that reduction and the other things that that alternative is addressing. [Comment Index Number: 14]	12. The lower costs for estimated range improvements under Alternative C (Table 2-5) do not reflect a lower management commitment toward financing improvements. What these lower figures do reflect, however, is the fact that fewer range improvements of certain types are necessary to improve or enhance wildlife and watershed conditions under Alternative C. A number of water developments and acreages to be reseeded under the preferred alternative would be omitted from this alternative; under the other alternatives, they would be done primarily to enhance livestock management with mitigating measures incorporated to protect wildlife and watershed values. While Alternative C projects lower range improvement costs, it should be noted that the lower stocking levels projected would result in an adverse economic impact to individual livestock operators and the industry as a whole.
13. One thing that wasn't so clear; however, was how specific concerns would be addressed on an allotment-by-allotment basis. For instance, in Appendix E (Opportunities For I Allotments) you might state "XYZ Allotment: riparian vegetation in unsatisfactory condition, excessive soil erosion, elk and deer winter range in unsatisfactory condition." You would then state in the Resource Management Objectives column something like improve riparian habitat, decrease erosion, improve elk and deer winter range. What seems to be lacking is the specific management action that needs to be taken to achieve some of these objectives, because in comparing Appendix N (Stocking Rate Adjustments) to Appendix E, it's not always clear how the improvements will be accomplished. Further, I'd like to have a better sense of what the priorities are for making these improvements. Given the reduced federal funds in recent years, it would appear that many of the improvements that involve intensive management may not get funded; it would have been helpful if the EIS would have looked at ways to meet resource objectives given possible budget constraints, which appear to be a reality. [Comment Index Number: 20]	13. Allotment-specific planning will occur according to priorities documented in Appendix E, as modified. A variety of management actions in addition to stocking rate adjustments will be used to meet the resource management objectives for a particular allotment; these actions are identified in Appendix M. At the time of activity planning, a more detailed analysis will be made and specific management actions needed to meet resource objectives for a particular allotment will be implemented. It is assumed that range program funding levels will permit implementation of two activity plans per year during the next twenty years. Also see the response to Comment Number 5 in this section.
14. I thought that you should know that the Teton County SCS, the Forest Service, and Mr. Newman have the first and only working joint agreement. This is on the Blind Horse Creek or we call it Chicken Coulee Allotment. The trip we took into this area last year was very impressive on development of these water sources for better utilization of the range grass. The range was not over grazed. Mr. Newman was rotating the pastures. He is trying to improve the vegetation from the time he took the allotment over. I would be opposed to eliminating cattle from this allotment down the road. [Comment Index Number: 80]	14. We recognize and appreciate the joint cooperation between Mr. Newman, the Teton Conservation District, the U.S. Forest Service, and the Bureau of Land Management in efforts to improve conditions on the Chicken Coulee Allotment (#6303). While we would agree that indeed there has been good progress, there are also some areas where further improvement is desirable and we anticipate the continued cooperation of all of these parties in meeting these objectives. No adjustment in livestock numbers or season of use are proposed for the Chicken Coulee allotment.

TABLE 7-3 (cont.)

GRAZING ALLOTMENT AND RIPARIAN HABITAT MANAGEMENT

COMMENT	RESPONSE
15. Likewise, the DEIS offers inadequate justification for sagebrush control/burning projects mentioned on page 125 and again on page 127. There are high wildlife values associated with sagebrush including the elk calving habitat mentioned on page 125. [Comment Index Number: 30]	15. Sagebrush controlled-burning projects are considered for those sites with high potential for increase in grasses and forbs following reduction in woody species. Increases in grasses and forbs can improve watershed cover, increase forage production to benefit livestock, and, in some situations, benefit wildlife as well. Such proposals are planned on a site-specific basis, in consultation with the Montana Department of Fish, Wildlife, and Parks and with full interdisciplinary review by appropriate BLM specialists. Future projects of this nature are not likely to be carried out on a large scale within the resource area since only an estimated 300 acres are identified for treatment. The specific effects of sagebrush control and burning projects will be carefully considered and all appropriate mitigating measures will be applied prior to implementation.
16. The Muskrat Allotment Plan must be closely coordinated with the Elk Horns wildlife management plans now being prepared by the Helena National Forest. The proposed grazing rates for this allotment, a sensitive wildlife area, seem excessive and no mention is made of any proposed or current coordination. [Comment Index Number: 31]	16. Under Alternative A (the Proposed RMP) the target stocking level for the Muskrat Allotment #0249 is 109 AUMs below existing preference (see Appendix N). This adjustment will be made in accordance with current BLM policy that requires the use of monitoring information in conjunction with the stated target figure. Specific resource management objectives have been identified in Appendix E for this allotment that recognize wildlife needs, and the Forest Service has been consulted in their formulation. As more detailed activity planning is done for the Muskrat Allotment, the Forest Service and Montana Department of Fish, Wildlife, and Parks will be consulted further and full consideration will be given to any specific guidelines they may have for the Elkhorn Wildlife Management Area.
17. Although the EIS proposals include livestock numbers and incorporate, for the most part, existing seasons of use, they lack any specific grazing systems and contain utilization levels only for a fraction of the allotments. Existing grazing systems are not described for each allotment, and no specific grazing systems are proposed; instead, the EIS merely describes general types of grazing systems that might conceivably be implemented in unspecified allotments in the future. (EIS, p. 25 and App. G.) The EIS fails to include existing utilization levels, even though such levels presumably will continue under the "no action" alternative. Moreover, specific utilization levels are proposed only for a few Category I allotments (e.g., App. E, p. 228) and no such levels are proposed for any Category M or C allotments. The EIS does contain, at least for Category I allotments, the objectives that a specific grazing management program should meet in each allotment. See App. E. However, for the most part it fails to identify or analyze any specific actions that must be taken to achieve these objectives. The Bureau's "objectives" are stated in general terms like "improve the riparian habitat," "improve vegetative cover and livestock distribution patterns," and "limit livestock utilization" (e.g., pp. 222-23), but few specific actions that will attain these ends are identified. Such proposals are particularly important since, as the Bureau admits, "implementation of grazing systems" and other specific actions are necessary to attain these objectives, and the EIS's impact analysis depends upon the development of such unidentified actions. (E.g., pp., 117-18, 143.) With respect to Category M and C allotments, the EIS even lacks specific management objectives, much less specific proposals, See App. E.	17. The Final RMP/EIS has been modified to incorporate additional information that documents the interdisciplinary resource considerations used in making the tentative classifications (M, I, or C) for each grazing allotment in the resource area (Appendix M). This process resulted in an I classificaiton for allotments having direct forage competition between livestock and wildlife or having other significant resource problems, such as soil erosion or water quality. For allotments identified as either M or C, significant resource opportunities, problems, or conflicts either do not presently exist or it is not feasible for changes to be initiated. Specific resource management objectives have been established for those allotments where conflict situations occur (Appendix E) and other management actions recommended for specific allotments are found in Appendix N. Where no specific opportunities, problems, or conflicts were identified, wildlife habitat and nonconsumptive resource values will be managed to maintain present satisfactory or high quality conditions. At the activity level of planning (primarily Allotment Management Plans and Habitat Management Plans) site-specific range improvements, grazing systems, and wildlife habitat management actions will be considered and analysed on an interdisciplinary basis through environmental assessments. Such proposed actions will be identified and published in Rangeland Program Summary (RPS) documents, in accordance with current BLM grazing regulations. Specific management actions will be tailored to specific allotment situations and applied in the best combination to meet resource objectives. Such management actions are listed in Appendix M.

TABLE 7-3 (cont.)

GRAZING ALLOTMENT AND RIPARIAN HABITAT MANAGEMENT

COMMENT	RESPONSE
18. The court in NRDC v. Morton required EISs to "discuss in detail . . . all reasonable alternatives" to proposed livestock grazing activities. To satisfy this mandate, the alternatives must encompass significantly different levels of livestock grazing, including "no grazing," and a full range of management practices. The grazing alternatives in the Headwaters EIS fall far short of these requirements. The alternative livestock forage allocations in the EIS do not vary significantly. There is little difference even between the resource protection (27,036 AUMs) and resource production (33,954 AUMs) alternatives. The resource production alternative is not "meaningfully lower" than the proposed action, as the Bureau has previously acknowledged is necessary. "Draft Guidelines for Preparing Grazing EISs," p. 23 (April 1979). Moreover, the EIS lacks a "no grazing" alternative, which is necessary in order to provide a baseline for comparison of all other alternatives and to protect riparian and other degraded resources. See Draft Guidelines, at 23; "Final Grazing Management Policy," p. 1-18 (I.M. No. 82-292, March 5, 1982). Thus, it is clear that the Bureau has already decided to maintain stocking levels at approximately the existing numbers and that the consideration of alternatives in the EIS has been a mere formal exercise. The EIS obviously lacks a "full range of management practices," as required by the Final Grazing Management Policy, supra, at 1-18. In fact, the EIS fails to consider any alternative management practices. For example, the alternatives do not include any different grazing systems, utilization levels, or seasons of use. The Bureau has demonstrated in other grazing EISs that it can consider a range of alternative grazing systems, seasons of use and utilization levels for each allotment. See, e.g., Southern Malheur Draft Grazing EIS, Vale District, Oregon (1983); Willow Creek Final Grazing EIS, Susanville District, California (1982). The absence of such alternatives in the Headwaters EIS is a critical flaw. [Comment Index Number: 33]	18. Results of public participation activities, carried out between 1979-1983 according to requirements of 43 CFR 1610.2, helped shape a reasonable range of alternative livestock forage allocations for consideration and development in the RMP. The RMP/EIS analysis indicates that reducing livestock forage allocations is not the most frequent or appropriate action required to remedy present resource conflicts, such as unsatisfactory riparian habitat conditions. Many of the other actions shown in Table M, p. 295 of the Draft will be more appropriate in relation to specific problems. More specific management actions for each allotment, including changes in the kind of grazing system and the season of use, will be considered and evaluated at the time of activity planning (AMPs, HMPs). A No Action alternative that constitutes existing management direction and present resource use levels (43 CFR 1610. 4-5) has been considered and analyzed in detail. As discussed in Chapter 2 under Alternatives Eliminated From Detailed Study, a No Grazing alternative was considered and analyzed during the scoping phase of developing this resource management plan. Based on this analysis, the No Grazing alternative was dropped from further discussion in the Draft RMP/EIS as provided in Section 1502.14(a) of the regulations for implementing the procedural provisions of the National Environmental Policy Act, as promulgated by the President's Council on Environmental Quality (CEQ). The full analysis of the No Grazing alternative, in compliance with Section 1502.21 of the regulations cited, is available at the Butte District office for inspection by interested persons. The following impact analysis summary and conclusions for the No Grazing alternative are provided to further clarify why this alternative was not carried forward in the document. **Livestock Grazing** The exclusion of livestock from public lands in the resource area would require construction of approximately 2,090 miles of fence at an approximate total cost of $6,270,000. Annual maintenance cost for the newly constructed fence and the approximately 1,200 miles of present boundary fence (now maintained by livestock operators) would be borne by BLM at an annual cost of about $164,500. In addition, the BLM's present investments in interior allotment fencing for livestock management would be lost except for the salvage value of the fence material. The same would apply to investments already made in water and other management facilities unless they were of use to wildlife. BLM would assume maintenance cost on the water developments and other facilities not abandoned. The cost of the fences, water facilities, etc. now in place on public land has often been borne partially or entirely by the livestock operator using the allotment. If the grazing authorizations were cancelled, operators would be entitled to monetary compensation for their lost investment in range improvements on the public land. All existing public road rights-of-way would be fenced and/or additional cattleguards would be installed where public lands are crossed; all future public road rights-of-way grants similarly would be subject to fencing. Livestock trespass detection and abatement also would require significant annual BLM funding. (Response continued on next page)

GRAZING ALLOTMENT AND RIPARIAN HABITAT MANAGEMENT

COMMENT	RESPONSE
	Wildlife Previous analyses have shown that the total exclusion of livestock is not necessarily a desirable action to meet management objectives for wildlife habitat. In the Prairie Potholes EIS, for example, it was found that "The lack of livestock grazing would not necessarily improve the quantity of all wildlife forage and cover. Additional forage and cover would more than satisfy the needs of increased populations of upland game birds, waterfowl, nongame wildlife, and fisheries. Big game forage, however, could be reduced as plant communities changed from shrubs to grass." The long term result is uncertain as the area has always been grazed by large ungulates (buffalo before livestock), and the response of wildlife species in the absence of large ungulates has not been observed over such a large area. The extensive fencing required for implementation of a No Grazing alternative could also cause adverse impacts to elk, deer, and antelope by disrupting established patterns of wildlife movement. **Vegetation** The short-term effects of eliminating livestock grazing on public lands would include improving the vigor of those plant species that are preferred as forage by livestock in many grazing allotments. The amount of vegetation remaining onsite as residual cover and litter would increase markedly. No dramatic resource area-wide changes would be expected in the composition of vegetative communities in the short term because the establishment of new long-lived perennial plants, which characterize the vegetation in this region, occurs over a longer period of years. Even the sites with the greatest potential to respond vegetatively to management changes would require an estimated five years to improve from a fair to good condition rating under the most favorable management practices. (Refer to Appendix M for a discussion of how sites were classified and how vegetative condition ratings were assigned to plant communities found on these sites). The expected increase in residual vegetation would also increase the potential for wildfires. Wildfires would be expected to spread rapidly and burn more intensely. The long-term effects of elimination of livestock grazing can be estimated thru inspection of areas where grazing has been excluded for a relatively long period of years. Such areas were located and inspected during the course of the vegetative inventory. In general, these areas are strongly dominated by long-lived perennial grasses that provide the forage preferred by cattle, elk, and other large ungulates that subsist mainly on grass and grass-like plants. The exceptions to this are sites where woody vegetation dominates the site if undisturbed. The plants in these communities are often very coarse and some exhibit decadence as a result of excessive standing litter within the crown of the plant. **Recreation** Recreation access would be affected by a number of factors if cattle use of BLM land is eliminated. The principle factor is that of fencing. New fences along property boundaries and easements or rights-of-way would inhibit recreational travel both with vehicles and on foot or horseback. In addition, many vehicle ways are presently maintained by the livestock user for access to the allotments. Such maintenance enhances recreational opportunities by preserving traditional routes. As a result of (Response continued on next page)

TABLE 7-3 (cont.)

GRAZING ALLOTMENT AND RIPARIAN HABITAT MANAGEMENT

COMMENT	RESPONSE
	the elimination of grazing opportunities, ranchers and other landowners may become less inclined to allow recreational use of their private land in conjunction with the public lands. On the other hand, fencing would identify the boundaries of public land and thus would help users to stay on public land for their recreational pursuits, eliminating some of the present conflicts between private landowners and recreationists, particularly along waterways. Assuming that public access remains available, the elimination of livestock from areas that are popular for recreation generally would enhance the recreational experience. Roadless and undeveloped areas would appear more wild without the presence of cattle. The reduction of manure and flies would also enhance recreational opportunities. Riparian zones would be less trampled and often more desirable for camping, fishing, and other similar activities. Hunters would not have to contend with cattle on public lands during the hunting seasons, when cattle movement and activity can affect game. Vegetative changes would take place that could affect recreation. More vigorous vegetative growth would generally enhance the visual aspects of recreational activities. Changes in wildlife populations would in turn affect big and small game observation and hunting. Depending on the specific site conditions, more shrubs or grass would influence the amount of desirable space for picnicking, camping, or other recreational activities. Wildfires may become more frequent and severe, thus creating public hazards and impacting the physical environment that recreational activities depend on over the long term. **Livestock Production** The exclusion of livestock grazing on public lands in the entire resource area would result in a decrease in production of red meat. Of the 31,501 AUMs currently authorized, about 90% or 28,350 AUMs are harvested each year. The remainder is accounted for by nonuse applications received and approved in the average year. If each AUM of livestock forage sold produces a monthly weight gain of 60 pounds (or 2 pounds per day) the decrease in red meat production under this alternative can be estimated at 1,701,054 pounds per year. **Economics** The elimination of all grazing from public lands in the resource area would affect 327 allotments and 292 permittees/lessees. Of these permittees/lessees, 111 have 25 AUMs or less of BLM grazing. It is assumed that operators with so few AUMs would not be significantly affected by changes in BLM grazing. For operators with more than 25 AUMs of BLM grazing, the No Grazing alternative would result in a decrease in ranch income related to ranch size and the individual rancher's dependency on BLM grazing. Average changes in income vary from a 131% decrease for operators with 100 or less brood cows to a decrease of 3.8% for operators with more than 1,000 brood cows. The toal decrease in net annual income for the analyzed ranches would be $1,324,185, a decrease of 18.5%. Elimination of federal grazing would reduce permit values for 181 ranches by the full amount of their current value of $2,786,900. These decreases in permit value would have a negative effect on the ability of ranchers to borrow money and affect the sale value of these ranches. Ranches that are heavily dependent on BLM grazing could face an even greater reduction in property value, since the ranch may no longer represent an economic unit.

TABLE 7-3 (cont.)

GRAZING ALLOTMENT AND RIPARIAN HABITAT MANAGEMENT

COMMENT	RESPONSE
	A major component of an operators income comes from ranching. This is true for all but the smallest ranches that may produce more income from crops or from outside sources. Therefore, a reduction in BLM grazing would have a direct effect upon personal income. Even with large cuts in income, most ranchers would continue ranching in the short term. One of the major determining factors in how long an operation can sustain itself through depreciation, deferring maintenance, or using equity capital is the operators current debt load. If the rancher's land is paid for, it is likely that they can continue in business. **Social** The social wellbeing of 292 ranch families would decrease under this alternative. The magnitude of impacts would be related to the dependency of the ranch upon BLM grazing and the economic health of each individual operation. Some would be severely impacted while others would see little effect. Those operators with both a high dependency upon BLM grazing and a high debt load could be forced out of business or forced to find outside employment. However, prospects for outside employment in rural areas may not be good. If a rancher were forced to quit the livestock business many intangible losses could also occur. Among these are the loss of opportunity to live a preferred lifestyle, loss of ancestral ties to the land, and the possible breakup of extended families and close circles of friends. **Regional Economics** Under a No Grazing alternative, there would be an annual reduction in the value of livestock sales of approximately $2,254,000. The decrease in total annual gross business volume would be approximately $7,771,000. Total employment in the resource area would decrease by approximately 119 people and total earnings would decrease by approximately $2,357,000 anually (less than 1% of the resource area total in 1980). This would be insignificant to the economy of the total resource area. **Social Attitudes** No specific information on attitudes toward the No Grazing alternative has been collected. However, the reaction of ranchers and those who identify with them can be expected to be extremely negative. Even though many ranchers would experience little or no impact personally, they would likely sympathize with those who would experience adverse impacts. Given the current economic climate for the livestock industry, this alternative would likely be viewed as one more step in forcing small family ranchers out of business. It could be expected that widespread resentment toward BLM policies would grow and persist for the foreseeable future. This alternative would strengthen resolve that planning and management of the public lands be done at the local level. (Response continued on next page)

GRAZING ALLOTMENT AND RIPARIAN HABITAT MANAGEMENT

COMMENT	RESPONSE
19. The EIS's discussion of environmental impacts to range resources is extremely generalized and unsubstantiated, and thus fails to satisfy NEPA's requirements. The judgement in NRDC v. Morton requires EISs to analyze "the actual environmental effects of particular [grazing] permits or groups of permits in specific areas." Although the Headwaters EIS sets forth aggregate figures that summarize anticipated impacts of proposed grazing to range resources (e.g., pp. 116-18), it completely lacks the "individualized assessment of the impact of such grazing on local environments" required by NRDC v. Morton. The EIS must analyze and describe environmental consequences to particular allotments, not just aggregate impacts to the entire area. The EIS also fails to present available range monitoring data, describe the data necessary to make management decisions, or specify when and how such data will be obtained. The EIS states that livestock use adjustments will be based in part on "monitoring" (p. 25) and also acknowledges that some monitoring data are available (App. N, p. 296). However, these monitoring data are not described, and the EIS never specifies what kind and amount of monitoring data are necessary to make grazing decisions. In particular, the EIS fails to explain if and why available data are inadequate, and why such data cannot be extrapolated to make necessary grazing decisions as soon as possible in similar allotments lacking such data. Without such explanations, the public will never know which data are "acceptable" to support actual grazing decisions, and such decisions may be deferred indefinitely. Finally, the environmental impact analysis is also unsatisfactory because it is based on hypothetical proposals that have yet to be identified. For example, predicted improvements are "dependent upon implementation of grazing systems, installation of range improvements, and performance of land treatments" (p. 117), even though no such specific proposals are identified or analyzed in the EIS. Similarly, "improvement in riparian condition" is premised upon unidentified "livestock grazing systems. . .[and] season-of-use changes." (p. 120). The BLM cannot simply expect the public to trust that appropriate actions will be identified in the future and that as a result resource problems will be resolved. [Comment Index Number: 33]	19. The level of impact analysis presented in the document is commensurate with the level of planning guidance needed to resolve the range management issue in this RMP. BLM policy and statute (P.L. 95-514, Sec. 5(d)) require that more localized environmental assessments for specific range improvements and other changes in management be done at the activity planning stage. On pages 24 and 236 of the Draft RMP/EIS, the need for future environmental analysis has been documented. The aggregate figures presented in the Headwaters Draft RMP/EIS to summarize anticipated impacts are in many cases based on more localized assessments of anticipated impacts and needed improvements. Such assessments were not necessarily focused on individual allotments. For example, projected changes in range condition for I allotments were based on the expected response of specific ecological sites to changes in management. Soils, site potential, mean annual precipitation, present vegetative community and composition, and other factors were considered in forecasting the amount of change that could be expected on a site. Appendix I identifies the types of studies and methodologies to be used in monitoring the effects of grazing management. A detailed monitoring plan will be prepared in 1984. The I category allotments will receive the majority of attention to assure that objectives set forth to resolve conflicts are being met. The M and C allotments will be monitored at an intensity to detect problems or conflicts that may arise. As allotment-specific decisions are made as a result of monitoring, the public will be provided notice through the use of Rangeland Program Summaries published periodically during implementation. Also see response to Comment Number 13 in this section.
20. The EIS contains estimates of current grazing capacity in most allotments, but lacks other important range condition and resource information needed for the reader to assess the impacts of the proposed actions. The statistical data on range condition (App. D) is useful, but it must be supplemented by descriptive information in order to ascertain and analyze specific resource problems. Such descriptions are clearly presented for Category I allotments (App. E), and we commend the agency for providing such specific information. However, no such descriptions are offered for Category M or C allotments, suggesting that the agency has impermissibly written these areas off. The Bureau's failure to analyze resource problems in many allotments reflects a broader deficiency of the EIS's land categorization proposals. The EIS announces categorization decisions but lacks any discussion of how particular decisions were made. Without descriptive information on resource problems and opportunities in all allotments it is impossible for the reader to assess the proposed categorization decisions. The EIS should provide such descriptions for all allotments and should analyze how the categorization criteria were applied to reach these proposed decisions. The public would then have a mean- (Comment continued on next page)	20. The Final RMP/EIS has been modified to incorporate additional information that was used in categorizing allotments. (See Appendix M).

TABLE 7-3 (cont.)

GRAZING ALLOTMENT AND RIPARIAN HABITAT MANAGEMENT

COMMENT	RESPONSE
ingful opportunity to comment on the categorization decisions, as contemplated by the "Final Grazing Management Policy," pp. 1-11 to 1-15. As written, the Headwaters EIS effectively bars the public (other than ranchers) from taking part in these important decisions. [Comment Index Number: 33]	
21. The EIS also announces two possible priorization schemes for category I allotments, as well as "final" management priorities. (App. E). It is unacceptable for "final" decisions to be made prior to public comment and selection of the preferred alternative. To establish "final" decisions at this stage of the process makes a mockery of NEPA's requirement of full disclosure and public participation prior to agency decisions. [Comment Index Number: 33]	21. The word "final" was a poor choice of words. The column that was marked final was meant to represent the interdisciplinary priority that was assigned after balancing the wildlife and livestock priorities. It was only "final" in the sense that it represented an interdisciplinary priority as opposed to a single program's priority. In the Final RMP/EIS, a new ranking system has been used and is displayed and explained in Appendix E.
22. Finally, the proposed action will produce a relatively small number of additional AUMs at a very high cost. The EIS fails to justify this large expenditure, which in large part consists of a subsidy to the livestock industry. Given recent budget reductions, it is very questionable whether many of the "range improvements" that inure primarily to the ranchers should be implemented. The EIS acknowledges that the "initial proposed action" is "no action." (p. 15) Such an approach is unacceptable given the resource problems that admittedly exist in the area. Moreover, additional monitoring is not needed to make adjustments in existing grazing use where, as here, available range information clearly demonstrates the need for such changes. Nor is livestock monitoring required before making planning decisions that are needed to protect important resource values, like endangered grizzly bears (pp. 91-93), that should take precedence over livestock grazing. In such cases, livestock reductions or modifications should be implemented as soon as possible. To delay needed modifications in existing management under the circumstances contravenes the Bureau's obligation under FLPMA to "take any action necessary to prevent unnecessary or undue degradation" of the public lands. [Comment Index Number: 33]	22. The preferred alternative for this RMP differs from the no action alternative and provides for changes in present grazing management to resolve resource conflicts. Additional monitoring studies are needed to further analyze, confirm or adjust target stocking levels and to be consistent with current BLM policy. A preliminary benefit/cost estimate has been developed for each I allotment based on current information and professional judgment (see Appendix E). Further benefit/cost analysis will be done on an allotment-specific basis to fully evaluate the effectiveness of improvements needed to accomplish management changes.
23. Appendix E: Priority has assigned numbers 1 and 2, but no explanation of meaning of 1 and 2 given in text. [Comment Index Number: 74]	23. Appendix E has been modified in the Final RMP/EIS to more accurately reflect management and implementation priorities for I allotments. Those allotments with an A designation have the highest priority followed in descending order by B, C, and D categories. Highest ranked allotments will receive highest priority for investments in range improvements and land treatments, for monitoring efforts, and for development of activity plans. In the Draft RMP/EIS, (1) indicated high priority, while (2) indicated low priority.
24. Do not know what is really meant by "alternative". What are the alternatives being considered for specific allotments? [Comment Index Number: 74]	24. Alternatives were developed for I allotments by analyzing different short-term changes in livestock stocking rates (Appendix N) and by adjusting implementation priorities (Appendix E). Alternatives were not analyzed for M and C allotments since, by definition, these allotments either are in satisfactory resource condition or, where conditions are unsatisfactory, viable opportunities to correct problems are lacking.

GRAZING ALLOTMENT AND RIPARIAN HABITAT MANAGEMENT

COMMENT	RESPONSE
25. No mention is made of present Range User—B.L.M. cooperation in current managememt; i.e., deferred grazing (as defined in appendix G). Appendix E seems to suggest that deferred grazing is the wrong alternative plan. [Comment Index Number: 74]	25. Regardless of which kind of grazing system may be used to meet specified allotment objectives, the participation and cooperation of the individual rancher is recognized as being a key ingredient to success. Appendix E lists specific resource management objectives for specific I allotments and is not intended to suggest that the practice of deferred grazing may be wrong. For each allotment, a combination of different management practices may be required to address resource conflicts/opportunities.

WILDERNESS STUDY RECOMMENDATIONS

1. Because of the importance of the three are as known as Deep Creek/Battle Creek, Blind Horse Creek, and Chute Mountain to wildlife, including endangered species, we suggest that you very seriously consider recommending these areas to Congress as suitable for wilderness. Some of the impacts to wildlife are eliminated or dampened when the provisions for wilderness management are in place, and due to the potential for resource extraction in these areas, wilderness designation may well be the best option available to insure long-term protection of these areas and their associated wildlife, particularly the grizzly. If you decide that you are unable to recommend these areas for wilderness, then we request that they be managed as roadless areas. [Comment Index Number: 6, 11, 21]	1. Designation and management of Deep Creek/Battle Creek, Blind Horse Creek, and Chute Mountain as wilderness is one of several options considered for the protection of wildlife habitat, including grizzly bear habitat. All the alternatives address the BLM's legal obligations to protect the grizzly bear and its habitat as well as provide for other resource uses. Alternative A, the proposed action, provides three significant types of protection for wildlife habitat in these areas by: designating the areas as Outstanding Natural Areas, establishing no surface occupancy restrictions for portions of the areas, and designating areas where leasing will not be allowed.
2. On the other hand, the Black Sage and Yellowstone River Island areas don't have nearly the wilderness potential as the Front areas. Nevertheless, as important roadless areas their wild nature should be preserved. Clearly, the roadless attributes of the Black Sage area aren't very highly valued in the DEIS. [Comment Index Number: 20]	2. The roadless attributes of the Black Sage area were one of several factors that were considered in making the nonsuitable recommendation (see Appendix R of the Draft RMP/EIS for a complete discussion of the BLM's wilderness study policy.) The many impacts on naturalness did detract from the overall wilderness quality of the area, but the numerous range improvements, irregular configuration, and poorly identified boundaries were also important factors in the nonsuitable recommendation. Although neither the Yellowstone River Island nor the Black Sage area are being recommended for wilderness designation, it is unlikely that either area will be significantly altered by new roads or other developments during the life of this plan.
3. Although there are many positive aspects to the Preferred Alternative "A" the MWA supports the more protective Alternative "C" as a better means of balancing resource production demands with the outstanding wildland/wildlife values within the Headwaters Resource Area. In particular, we support statutory wilderness designation of the three Rocky Mountain Front WSA's: Blind Horse Creek, Chute Mountain, and Deep Creek/Battle Creek. The Bob Marshall Alliance, of which the MWA is a member, has endorsed Teton and Deep Creek national forest additions to the Bob Marshall Wilderness along the eastern front national forest boundary so as not to leave a strip of unprotected national forest land between the Bob Marshall and the BLM WSA's. Congress will soon consider the Bob Marshall additions. We are hopeful that the Bob Marshall Wilderness boundary will soon be expanded to protect as much of this great ecosystem as possible. [Comment Index Number: 28, 39]	3. BLM policy requires that all areas under wilderness study must be evaluated independently from contiguous nondesignated agency lands. A major point of consideration at this time is whether or not these tack-on study areas could be managed for wilderness if Congress did not designate the adjacent F.S. lands. By designating Blind Horse Creek, Chute Mountain, and Deep Creek/Battle Creek as Outstanding Natural Areas the BLM is ensuring the same comparable short-term protection as wilderness. Consequently, the option will be available in the future to reevaluate these areas for wilderness should Congress designate the contiguous Bob Marshall additions and if wilderness remains a public issue.

TABLE 7-3 (cont.)

WILDERNESS STUDY RECOMMENDATIONS

COMMENT	RESPONSE
4. Yellowstone River Island (MT-075-133) would be an ecologically unique addition to the National Wilderness Preservation System and should be so designated. [Comment Index Number: 28]	4. Although the Yellowstone River Island would increase the ecological diversity of the National Wilderness Preservation System, this is only one factor that must be considered in determining whether an area should be recommended as suitable for wilderness designation. Appendix R in the Draft RMP/EIS describes the two criteria and six quality standards that are used in the study process. In the case of the Yellowstone River Island, its small size, offsite impacts, and manageability problems outweighed its contribution to ecosystem diversity.
5. The rationale presented on page 115 and in Appendix L for designation of the Blind Horse, Deep Creek/Battle Creek, Black Sage, Chute Mountain, and Yellowstone River Island as Outstanding Natural Areas rather than Wilderness Areas is invalid. Short-term protection of these areas is simply not equivalent to the long-term protection which wilderness designation would provide. It is inconsistent to protect an area with high wilderness values only until a commercially viable product is discovered thereon. The justification that some of these areas may have high oil and gas potential fails to recognize that in some cases higher values exist than those associated with production of oil and gas. [Comment Index Number: 30, 32, 45, 50]	5. It is assumed that the study areas this comment is referring to are Blind Horse Creek, Chute Mountain, and Deep Creek/Battle Creek, since the remaining two areas are not being recommended for special designation. These three areas were studied for wilderness under authority of Section 202 of FLPMA. The BLM wilderness study evaluation was based on the two planning criteria and six quality standards as sited on page 310 of the Draft RMP. These guidelines come from the Federal Register release on February 3, 1982 entitled: Wilderness Study Policy; Policies, Criteria and Guidelines for Conducting Wilderness Studies on Public Lands. Energy and mineral values were only one of the eight primary factors considered. For the three areas along the Rocky Mountain Front, the primary factors influencing the nonsuitable recommendations were small size, inability to significantly contribute to the National Wilderness Preservation System, poor manageability (irregular and poorly identifiable legal boundaries, private inholdings, grandfathered oil and gas leases, etc.), and energy values. While considerations of these factors resulted in the decision to recommend the areas as nonsuitable for wilderness designation, it was determined that some form of protective management was justified. Therefore the areas were recommended for designation as Outstanding Natural Areas (ONA). The intent of ONA designation is not just to protect important surface values until a commercially viable product is discovered. The intent is to protect the unique resource values of these areas while allowing certain types of compatible activities that might not be allowed under wilderness management. For example, oil and gas leasing can be allowed in ONAs, although in this case such leases would be accompanied by no surface occupancy stipulations to protect surface values.
6. In the Blind Horse, Deep Creek/Battle Creek and Black Sage areas public comment favored either wilderness designation or further study. Public comments relating to the Chute Mountain and Yellowstone River Island areas were inconclusive. See Appendix L. In view of these results BLM seems to be ignoring public opinion in favor of oil and gas and mineral exploration. [Comment Index Number: 30]	6. The public comments analyzed in the Draft RMP/EIS were received during the 1978-1980 wilderness inventory process. At that time, several public comment periods were established so that interested people could comment on whether or not these inventoried units should be studied further for wilderness as WSAs. During the wilderness study process, public comments are only one of eight factors used to determine whether an area should be recommended as suitable for wilderness designation. Appendix R in the Draft RMP/EIS contains a complete description of the two planning criteria and six quality standards that are used in the study process.

WILDERNESS STUDY RECOMMENDATIONS

COMMENT	RESPONSE
7. In light of the preceding discussion, the decision on wilderness designation for these areas should be left to Congress, not made internally by the agency. As the DEIS makes clear, if Congress were to include these lands in the wilderness system, BLM would still manage them as natural areas. Thus, Congress not the agency should make the choice of short-term versus long-term protection. [Comment Index Number: 30]	7. Since only Congress can designate an area as wilderness, Congress does have the ultimate decision making authority for all BLM wilderness recommendations. Nonwilderness recommendations for areas studied under authority of Section 202 of FLPMA will be finalized by the State Director and will not be reported to Congress; however, Congress can at any time overturn that decision and designate an area as wilderness on their own initiative.
8. The first point concerning manageability of these areas is unsupported throughout the RMP/EIS and is, in fact, contradicted by several statements in the descriptions of each individual area. Although the Blind Horse Creek is the only WSA with a small private inholding, the RMP states that "the area stands as an independent study area due to strong public support and its ability to be managed in an unimpaired condition" (p. 75). (Emphasis is added). Meanwhile, there is no mention or explanation in the RMP/EIS of why the Chute Mountain and Deep Creek/Battle Creek WSAs could be considered difficult to manage. On the contrary, since both areas have no non-BLM inholdings and would be tack-ons to the Deep Creek Further Study Area, management should present no insurmountable difficulties for the managing agency. [Comment Index Number: 32]	8. The contradiction you note on page 75 of the Draft RMP/EIS refers to findings made during the intensive inventory phase of the wilderness review process. The intensive inventory was not intended to assess the manageability of roadless areas in any detail. Rather, the intensive inventory was intended to identify those roadless areas that possess the minimum necessary characteristics of wilderness including size, thereby qualifying for wilderness study. The study phase of the wilderness review process, as documented in the RMP/EIS, is the phase during which manageability is assessed in detail. In the case of the Blind Horse Creek area, the intensive inventory findings indicated that while the area was less than 5,000 acres in size, it was of sufficient size to make practicable its preservation and use in an unimpaired condition. The findings of the RMP/EIS however, indicate that other manageability considerations, irregular and poorly identifiable legal boundaries, a private inholding, and pre-FLPMA oil and gas leases coupled with the small size, make the Blind Horse Creek area unsuitable for wilderness designation. The statement referenced on page 75 of the Draft RMP/EIS has been changed to clarify its meaning (see Errata; see also response to Comment Number 5 in this section). The RMP/EIS notes that all three units along the RMF are entirely leased for oil and gas and have high potential for natural gas. The possibility of future impacts associated with exploration and development is considered significant. Impacts could be significant for both the short and long term since all existing leases are exempt from nonimpairment restraints and some possess valid existing rights. Furthermore, the areas have legal rather than topographic boundaries that are not readily apparent on the ground. As a consequence, the possibility of inadvertent trespass disturbances are more likely.
9. Wilderness Study Recommendations—In this alternative, all five of the areas currently under wilderness study would be recommended to Congress for wilderness designation. In the long term, 17,197 acres in the resource area would be maintained under wilderness values. *None of the five areas would be recommended to Congress for wilderness designation; three areas would be recommended as Outstanding Natural Areas and managed as wilderness. *Alt. A. It's my view, among the most important BLM Wilderness Study Areas in the Headwaters Resource Area are the units scattered along the magnificent Rocky Mountain Front especially those adjacent to the Bob Marshall Wilderness. Why save wilderness? It provides recreational opportunities, wildlife habitat. Wilderness protects watersheds and prevents floods. It helps maintain air quality and water quality. Lastly, future generations will have a stake in these lands if left in their natural settings—a wonderful heritage. [Comment Index Number: 62, 28, 61, 82, 83]	9. It is true that the three areas studied for wilderness along the RMF are highly natural in character and possess outstanding wildlife, recreational, scenic, air and watershed qualities. Since these lands were found not to be suitable for wilderness due to size, manageability, and oil and gas concerns (see response to Comment Number 3 in this section for rationale), the preferred alternative is to preserve these areas through designation as ONAs. Management under this designation will provide almost the same level of protection as wilderness during the short term (see also Management Guidelines by Alternative A vs. C, Management Unit 03, page 169 of the Draft RMP/EIS). Although long-term protection is not as certain due to the potential for management changes in future planning efforts, major modifications are not anticipated and will continue to be subject to public involvement.

TABLE 7-3 (cont.)

FOREST MANAGEMENT

COMMENT	RESPONSE
1. Management Unit 23. The portion of this management unit in the Golconda Creek area adjacent to our Elkhorn Wildlife Management Unit currently provides excellent elk spring-summer habitat. Although our monitoring activities are not complete, early indications are that this area is key to elk in the Elkhorns. Because of the importance of this area to elk, and to be compatible with our management of the Elkhorns, any timber harvest should be restricted to that which maintains or improves elk summer habitat. This would most likely change the high priority for forest management that the area currently has to something else. Specific road management guidelines for this area would be helpful. We support the efforts to improve range conditions in the Muskrat Allotment. [Comment Index Number: 2,13,10]	1. Management guidance for the Golconda Creek, Muskrat Creek and Nursery Creek portions of Management Unit 23 has been changed to be more consistent with Forest Service management on adjoining lands. The timber in this area has been removed from the regulated allowable cut base. Timber harvest will be permitted, however, where it would result in improved wildlife habitat (refer to Chapter 2 and Appendix A, Management Unit 36). Also see our response to Comment Number 1 under Motorized Vehicle Access.
2. We endorse the utilization of the guidelines from the Montana Cooperative Elk Logging Study in the formulation of forest activity. Page 24, Paragraph I of the RMP, Silvicultural Guidelines and Harvesting Techniques—emphasis should be placed on minimizing public access into areas that have significant security values for elk and other wildlife species. [Comment Index Number: 13]	2. The Draft RMP/EIS (page 29) emphasizes this and other guidelines from the Montana Cooperative Elk Logging Study.
3. We support the seasonal wildlife restrictions as indicated in Table 2-2. But, we do object to the exclusion of timber harvest, regarding consultation opportunities provided the Department of Fish, Wildlife and Parks. Timber harvest activities have the same potential for adverse impacts to wildlife as other cultural practices involving vegetative manipulation. [Comment Index Number: 13]	3. The exclusion of timber harvest activities from consultation has been modified (see page 29). The Montana Department of Fish, Wildlife, and Parks will be consulted for all timber sales over 250 mbf in size and for smaller sales in sensitive areas.
4. The DEIS doesn't really present enough informatin to analyze whether or not the proposed timber harvest level is reasonable. I couldn't find any economic data on the relative value and accessibility of timber on BLM lands, nor was there much of a discussion of how BLM forest management might impact wildlife. While the document made the generalization that timber harvest could improve wildlife habitat, it should be noted that on many BLM lands in the Headwaters area security and thermal cover are more of a limiting factor than forage. The number of miles of roads proposed to facilitate timber harvest is another concern that I didn't feel was adequately addressed; I didn't get a feeling of the BLM road management policy. [Comment Index Number: 20]	4. The allowable timber harvest level proposed in the Draft RMP/EIS has been adjusted slightly downward in response to public comments (see response to Comment Number 1 in this section). However, the proposed harvest level remains very close to the level projected under the no action alternative and reflects the absence of any new information indicating a need for significant adjustment of current management direction for the Headwaters Resource Area. It should be noted that the substantial increases in funding and personnel needed to offer the full harvest level for sale are not anticipated during the foreseeable future. The social and economic importance of timber within the resource area was discussed in Chapter 3 of the Draft RMP/EIS (p. 105). The implications of forest management activities for fish and wildlife habitat are discussed for each alternative in Chapter 4, Environmental Consequences. The importance of security and thermal cover is acknowledged and is reflected in the plan's adoption of guidelines from the Montana Cooperative Elk Logging Study and in management guidance identified for the wildlife and fisheries program (see p. 29 of Draft RMP/EIS). Guidance for the road and trail construction and maintenance program is provided on page 30 of the Draft; additional guidelines specific to roads needed for forest management are identified on page 24. Best Management Practices for road construction and maintenance are also identified in Appendix C. This information is considered adequate for resolution of the forest management issue.

FOREST MANAGEMENT

COMMENT	RESPONSE
5. Some of the forested areas south of Rogers Pass (Head of the South Fork of the Deerborn) is occupied by Grizzly Bear habitat. The increased timber harvest potential expressed in the Plan contemplates a much increased potential harvest over the historical harvest. Does this harvest goal take into account possible impact on Grizzly Bear habitat? Would increased harvest endanger the Grizzly which is protected under the Rare and Endangered Species Act? [Comment Index Number: 40, 20, 45]	5. Management Unit 5 in the Rogers Pass area is within occupied grizzly bear habitat. The Draft RMP/EIS acknowledges that impacts will occur in this area as a result of forest management activites; however, the analysis concludes that such impacts can be kept within acceptable limits. The guidance provided for management of threatened and endangered species habitat also requires that the Montana Department of Fish, Wildlife, and Parks and the U.S. Fish and Wildlife Service be consulted prior to implementing projects that may effect habitat for threatened and endangered species.
6. The plan does not describe the natural harvest levels anticipated under the plan, and there's really no way for us, with this information, to assess the probable impact on the timber industry. The only reference that I found in the plan to the possible cut level was a statement that the forest resources will be managed essentially as they are at the present time. [Comment Index Number: 23]	6. Future timber harvest levels in the Headwaters Resource Area will be largely dependent on BLM funding and staffing levels. The RMP establishes that annual harvest levels may increase to approximately 2.4 million board feet per year. However, in the short term, it is assumed that harvest levels will remain at or near current levels.
7. The document states that the plan is issue driven and it further states that one of the criteria used to evaluate the alternatives are social and economic impacts, and it appears from reviewing the plan that this appraisal of economic impacts may not have been entirely adequate. The recommendations that I have, the BLM should assess its role in meeting the raw material needs of the timber industry in the affected area, particularly relative to changes and potential changes from other landowners and other agencies. We're anticipating a decline in timber harvest levels from national forests as a result of their forest planning process. The twenty-six million board foot allowable cut in the BLM plan could totally support the needs of a medium-size sawmill and could go a long way toward alleviating some of the timber supply concerns in an area. [Comment Index Number: 23]	7. The economic analysis in the Draft RMP/EIS is, in effect, a "worst case" analysis in terms of impacts to the industry. This analysis assumes that funding levels for the forestry program are likely to remain below that needed to harvest the full allowable cut for the resource area. Based on this assumption, little change is expected in harvest levels, thus limiting the BLM's ability to affect regional timber supply. The twenty-six million board feet allowable cut figure in the Draft RMP/EIS is to be cut over a ten year period not in one year and, as such, would not be sufficient to support a medium-sized mill.
8. We feel that the plan should state, if possible, the timber sale targets by decades and display it in the plan. This data is needed to evaluate the social and economic impacts and it would give us a better ground to make a rational comment on the plan, and it would also improve and strengthen the plan. [Comment Index Number: 23]	8. Because of the limited timber base and previous lack of timber data in the Headwaters Resource Area, "timber sale targets" have not been established in the past. The RMP indicates that up to approximately 2.4 million board feet per year could be harvested in the Resource Area and, following plan approval, funding will be sought to make this full amount available for harvest. However, until a funding level can be established, "sale targets" would serve little purpose.
9. The DEIS offers no economic justification for the timber harvest leases proposed. Past experience on Eastern Montana National Forest lands has shown even moderate silvicultural management to be economically inefficient. NEPA requires costs and benefits to be displayed, yet nowhere in the DEIS are the economics of timber analyzed. Especially in the Rodgers Pass area which contains summer and fall grizzly bear habitat the scale tips in favor of wildlife and against timber harvesting. [Comment Index Number: 30,32]	9. The timber harvest levels proposed in this plan are based on two primary considerations: the production capability of the land and the impacts on other important resources and values that timber production would cause. It is BLM policy to make timber available for harvest on a multiple use, sustained-yield basis to the extent consistent with other resource management objectives. While intensive management of central Montana forest land may be "economically inefficient" compared to other regions, the demand for timber from public land in the Headwaters Resource Area apparently is equal to or greater than the supply. This is evidenced by the fact that all sales offered are purchased at or above minimum acceptable appraised stumpage values. Furthermore, total public benefits from proper management and use of federal timber exceed stumpage receipts. Such benefits include improved access, habitat improvement, and firewood availability.

TABLE 7-3 (cont.)

FOREST MANAGEMENT

COMMENT	RESPONSE
10. The RMP/EIS has recognized the general effects of the timber industry on widlife habitat (especially aquatic habitat) and on recreational resources (pp. 114, 118-120), yet the acres to be harvested are the same for the preferred, no action, and protection alternatives. Why not consider different levels and locations of timbering, and analyze the impacts on specific habitat and recreational resources? This would allow for trade-offs between these resouces to be analyzed, and the incremental "costs" of timbering in terms of wildlife and recreation to be identified. [Comment Index Number: 32]	10. The acreage available for harvest under the preferred alternative has been reduced primarily to achieve greater consistency with Forest Service management objectives for the Elkhorn Mountains. The range of forest management alternatives considered in the RMP/EIS includes different levels and locations of timber harvest, as well as an analysis of trade-offs, and is considered adequate for resolution of this issue.
11. All the alternatives propose a dramatic increase in timbering activities—from 1 million board feet per decade to over 26 million board feet—without explaining why such heavy emphasis is being placed on timbering. Why was this increase selected? [Comment Index Number: 32, 40]	11. The preferred alternative, which has been adjusted slightly downward, essentially reaffirms existing management direction and resource allocations. The disparity between current actual harvest levels and the resource area's allowable harvest is a function of low funding and staffing levels. Thus, the proposed RMP, if fully funded and implemented, would result in timber harvest levels slightly lower than the harvest levels that could have occurred under existing management direction. The analysis indicates that such an increase in the actual harvest can occur without unacceptable impacts to other resources.

LAND OWNERSHIP ADJUSTMENTS

1. The following comments are relative to areas adjacent to or in close proximity of the Gallatin NF: T. 5 N., R. 9 E., Section14: BLM lands occupies most of the W 1/2 of this section, and the National Forest owns the entire E 1/2. This area is in the Three Peaks grazing allotment and both Agencies have the same permittee . . . Our proposed management prescription for this area is for wildlife and livestock. BLM has identified this tract as Category II for disposal through sale, exchange or transfer. We believe that this tract should be eventually included in a transfer program to the National Forest and included within our management area17. Canyon Mountain Further Study Area—T. 3·S., R. 8 and 9 E.: Realizing that this area will require further study by BLM, our comment at this time is that these lands should be included in a transfer program since they are important in providing future access and would also be valuable as trading stock in consolidating public ownership in this area. Study Area Adjacent to National Forest in East Side of Yellowstone Valley: The majority of these lands is adjacent to National Forest ownership and have high wildlife and recreational values. We strongly support that these BLM lands be retained in public ownership and eventually be included in a transfer program. The remaining BLM lands in the immediate vicinity of National Forest System lands in both the disposal and further study categories are generally scattered parcels not adjacent to Forest boundaries. Our comment is that in many cases these tracts could be utilized as key trading stock to block up within the Forests. [Comment Index Number: 2]	1. As outlined in the Draft RMP/EIS, site-specific decisions regarding land ownership adjustments will be made based on consideration of several criteria, including the suitability of the land for management by another agency and the consistency of the decision with cooperative agreements and plans or policies of other agencies. The Forest Service will be consulted prior to making land ownership adjustment decisions for tracts adjacent to national forest lands. BLM-administered lands needed for the achievement of management goals on adjoining national forest lands will be retained in public ownership.

LAND OWNERSHIP ADJUSTMENT

COMMENT	RESPONSE
2. A search of our Mineral Industry Location System (MILS) indicates about 10% of the total number of mineral properties in the state of Montana lie within government land tentatively categorized for disposal in the Headwaters Resource Area. The entire resource area contains nearly 50% of the total number of mineral properties in the state that are entered in the MILS System. We are enclosing a MILS printout for your information. We have been informed by your staff that lands categorized for possible disposal which are mineral-in-character will be reclassified to the retention category. We hope this will aid you in your analysis. [Comment Index Number: 5]	2. Energy and mineral potential is one criterion to be used in making site-specific decisions regarding land ownership adjustments. The MILS information will be used when applying this criterion. All mineral-in-character lands will not necessarily be retained in public ownership. Other factors to be considered include the presence or absence of mining claims; the significance of mineralization; and, in the case of exchanges, the mineral character of the nonpublic lands being offered.
3. We recommend that all tracts of public land along the water routes of the Lewis and Clark National Historic Trail be retained for present or future public recreational use (access, rest stop sites, camping, etc.) by persons traveling these waterways. [Comment Index Number: 9]	3. Almost all tracts of public land in the vicinity of the Lewis and Clark National Historic Trail are in the retention category. Any tracts that are in the disposal category will still be evaluated on a site-specific basis before any disposal action takes place. Two of the criteria that will be used in making a site-specific disposal decision are whether the tract has any sites eligible for inclusion on the National Register of Historic Places and whether the tract has any sites with any statutorily authorized designation.
4. It is unclear how the boundary between Management Units 9 and 10 was drawn, particularly in the Horseshoe Hills and the Smith and Musselshell River drainages. Several large blocks of public lands with high wildlife values occur within Management Unit 10 in these areas but have been placed in the disposal category. Several of these areas are contiguous with Management Area 9, a retention area. These tracts should be carefully evaluated before disposal is considered. These lands should have a high priority for exchange, as opposed to sale, because they could be valuable for increasing public access in Management Unit 9 and along the Smith and Missouri Rivers. [Comment Index Number: 13, 29]	4. The Horseshoe Hills are in a disposal zone so they can be considered for future exchanges. The lack of public access and the problems in acquiring access limit the public value of the Horseshoe Hills. The wildlife values of the Horseshoe Hills are known, but the importance of the scattered public land there to wildlife on an overall habitat unit basis must still be determined. If the Horseshoe Hills could be traded for equal or better wildlife habitat that has public access, such an opportunity should and would be available for analysis under the preferred alternative. There will however be a site-specific analysis before any disposal actions occur in the Horseshoe Hills. As for the Musselshell River area, tracts with high wildlife values were placed in retention or further study categories unless public ownership was so negligible or scattered as to preclude effective management. Again, the primary use of these tracts is for exchange, not sale. There are no large blocks of public land in Management Units along the Smith River.
5. The "sodbusting" in Montana could jeopardize BLM's asset management program. We support the exchange of lands for isolated tracts where there is potential irrigable lands and in areas that make good land management sense. These lands are principally rangeland and should not be broken up unless they are classified as tillable land by the Soil Conservation Service. We suggest that a "statement of intent" and a soil conservation plan accompany any person's or company's offer to buy or exchange BLM land. [Comment Index Number: 13]	5. It is not the intent of the land adjustment program to promote speculative plowing of rangeland. The Montana State Director is currently developing policy that will define the BLM's position on the sodbusting issue.
6. In our view, public land managed by B.M, along the Rocky Mountain Front, should not be sold. It should be retained by the American people. It could, however, be used in trades with USFS to consolidate USFS holdings, for better wilderness management along the east mountain front. [Comment Index Number: 21, 53, 81]	6. All but 120 acres of public land along the Rocky Mountain Front has been placed in the retention category. Before any of the 120 acres is actually disposed of, a site-specific analysis will be conducted to determine whether any significant resource values exist that would prevent disposal.

TABLE 7-3 (cont.)

LAND OWNERSHIP ADJUSTMENT

COMMENT	RESPONSE
7. The plan, generally, in identifying zones for disposal of public lands, has overlooked significant habitat and aesthetic values frequently associated with lands in those zones. Many of these lands are characterized by native grasslands. Such habitat, particularly in the valleys of western and central Montana, is becoming scarce due to land development for farming and housing. Many species of plants and animals are becoming rarer as a result. Public land tracts in such areas are an important resource in maintaining those species. Because of the changes brought on by development, the aesthetic value of these tracts becomes significant. We feel that the plan should be revised to recognize the habitat and aesthetic values of valley and prairie tracts of public land. [Comment Index Number: 25]	7. As explained in the response to Comment Number 6, a site-specific analysis will take place before any specific disposal actions occur. This analysis will consider habitat and aesthetic values.
8. But secondly, they said that they did not want to see large amounts of federal lands sold, but they wanted to see it remain federal and that basically the only sales we would support would be very small and very isolated tracts or federal buildings, abandoned military sites, these types of things. But land that's basically used for grazing or for crops purposes, agricultural land, our organization would like to see it remain as public land. [Comment Index Number: 26, 79, 83, 85]	8. Lands with public values justifying retention in federal ownership will not be considered for sale. The occasional use of sale as a disposal method has a definite place in the BLM's land adjustment program since exchange is not always feasible. In some cases, sale is actually the preferred method of disposal. The primary example is in the case of inadvertant trepass. When it is discovered that a person's house or field is located on a piece of public land that is determined to be suitable for disposal, it would often place an unnecessary hardship on the private party if they had to wait for the BLM to exchange that particular parcel. They would not be able to clear their title, their mortgage could be jeopardized; etc. A second example would be when two or more adjacent landowners wish to acquire a tract but cannot agree on how to divide up the tract. In such a case, competitive bidding might be the only means of reaching a solution. Competitive bidding is not allowed under the exchange regulations but is part of the sale regulations. Specific procedures for determining the type of sale is contained in Appendix T of this document.
9. And there are several reasons for this and they may be well-founded, they may not. The first and foremost reason is the fear of the unknown of who the potential future owner would be. Would they be bidding, for instance, on a highest bid basis against real estate developers, second home site seekers, et cetera, who would not be bound, of course, to pay a price measured by the productivity of the land as the agriculturalist would? That's number one. That's the number one reason for opposing large scale sales. [Comment Index Number: 26, 78]	9. Bureauwide policy has been developed for determining the proper sale method. (See Appendix T.) One of the primary objectives of this guidance is to avoid significant disruptions to present users. To meet this objective, modified competitive bidding or direct sale procedures can be used. The statement that the preferred method of sale will be open competitive bidding has been removed from the final plan.
10. Finally, and in regard to the proposed sales and exchanges of some tracts of BLM land discussed on page 112, we believe that BLM has the authority and the obligation to transfer jurisdiction of some of its lands to other appropriate state and federal agencies rather than to put these lands up for sale. We believe that a need does exist to exchange land under BLM's stewardship which have low public values for lands which have higher public values. However, we do not believe that isolation, small size or difficult management in and of themselves render a parcel of low public value. In fact, these may be the very factors which make the property important for wildlife. In almost every case, exchange is preferable to sale of public lands. [Comment Index Number: 30, 20, 25, 28, 29, 31, 40, 45, 51, 55, 56, 61, 72, 77]	10. It is specifically required by the disposal criteria in FLPMA that a parcel must not be suitable for management by another federal agency if it is to be sold; therefore, this is one of the first considerations when evaluating a specific tract for disposal. This criteria was listed on page 21 of the Draft. Also, many tracts adjacent to national forest land were placed in the further study category for just this reason. State and local governments may acquire public land for recreational or other public purposes under authority of the Recreation and Public Purposes Act. These governments are notified in advance of proposed disposal actions. (Response continued on next page)

LAND OWNERSHIP ADJUSTMENT

COMMENT	RESPONSE
	Exchange will generally be the preferred method of disposal as it provides the most benefits and accomplishes the greatest gain toward an optimum final land ownership pattern. Sale will be used when there is a special need to sell the tracts as provided for in the State Director's Guidance or when the BLM has tried but been unable to dispose of the tracts by exchange and it has been determined that the tracts have no values that justify retention in public ownership. Again, before any parcel is disposed of, a tract-specific environmental analysis must be completed. Tracts with significant values will not be sold. They may be exchanged if the exchange would improve public values overall. Tracts with critical resource values will not be disposed of by any method.
11. We also reiterate our position that BLM allegations that some smaller and more isolated tracts should be disposed of because of their "management difficulties" are, in most instances, insufficient reason for loss of public lands, part of the legacy of every American citizen. Difficulty of management is, at best, a subjective consideration and poses the question of how well BLM is managing its own fiscal and manpower resources in carrying out its mandated functions. Many of these smaller and more isolated tracts are "islands" of excellent wildlife habitat and contain other valuable public features. [Comment Index Number: 31, 29, 72]	11. Difficulty of management is only one of several criteria for determining which public lands should be disposed of. Other disposal criteria are listed on page 20 of the Draft RMP/EIS. These criteria are also contained in the State Director's Guidance, which was developed with full public participation. A disposal decision would be based on a full review of all the criteria and not just on management difficulties.
12. The Federation also strongly protests two statements made prefaced by the phrase "Sale will be the preferred method of disposal when:" "It is required by national policy"—the current administration's policy obviously is predicated on an exploitation ethic and the public's ownership of the land and its rights to retain this land for its use be damned. Despite the Secretary's disavowal of the Assets Management Program at Kalispell in June, this has been the theme of the Assets Management Program and there is no indication that that theme has been changed. "Where disposal through exchange will cause unacceptable delays"—exchange of BLM lands historically has been a slow process, but deliberation before action better insures protection of the public legacy. We urge BLM to seek innovative approaches to land exchange such as land pooling, a method which should greatly speed up the entire procedure. [Comment Index Number: 31]	12. The first statement has been deleted from the Final RMP. The second statement was not meant to apply to the basic land adjustment program. It is referring to tract-specific cases, such as an inadvertent, unauthorized occupancy trespass where an expeditious transfer of title is desirable. The Montana BLM is currently using the exchange pooling concept in an attempt to improve the efficiency of the exchange process. Nevertheless, some cases will still need to be handled on an individual basis, outside of the complexities of a large scale exchange program. In such cases, sale is the preferred method.
13. The inventory of lands within the disposal category and the analysis of impacts of proposed land disposal are clearly inadequate to fulfill the requirements of FLPMA and NEPA. The RMP/EIS does not identify or describe the specific resource values of the land within the disposal category, nor does the document explain how selling any of these tracts meets the criteria for land disposal contained in FLPMA Sec. 203 (a)(1)(2)(3). Although land exchanges are likely to enhance both public and private resource values and land uses in many cases, while the potential benefits of land sales are much more limited, the RMP/EIS combines both forms of land tenure adjustment into one general category of "land disposal". Furthermore, the conditions under which sale will be the preferred method of disposal are so general and ambiguous that it appears nearly all the 25,637 acres in the disposal category could be sold, rather than exchanged. [Comment Index Number: 32, 13, 14, 25, 29]	13. As stated in the Draft RMP/EIS, public land in the Headwaters Resource Area was placed into three general land ownership adjustment categories; retention, disposal or further study. Before any land ownership adjustment actions actually take place, a site-specific analysis will be done that will describe the resource values of the tract involved. The analysis will be documented through land reports and decision records. Public notification will be provided and public hearings will be held if county commissioners or the Commissioner, State Department of Lands, determine a hearing to be necessary or if public input calls for hearings. Any interested parties will have opportunity for comment or protest on future actions. In addition, as stated in the Draft RMP/EIS, exchange will be the preferred method of disposal and public land will only be sold if it meets the criteria listed in Sec. 203 (a)(1)(2)(3) of FLPMA. In summary, this RMP/EIS sets forth the general procedures and policies for land ownership adjustments. Future site-specific decisions will be accomplished through the BLM's environmental assessment process with opportunities for full public involvement as described above.

TABLE 7-3 (cont.)

LAND OWNERSHIP ADJUSTMENT

COMMENT	RESPONSE
14. If, as Mr. Penfold's statement suggests, BLM is returning to the "routine program that the public has supported" in the past, the quantity of land designated for land disposal should be greatly reduced in the final RMP/EIS. [Comment Index Number: 32]	14. Under the preferred alternative, 25,637 acres were placed in the disposal zone. This represents less than 10% of the public land in the Headwaters Resource Area. The net loss of public land however, will be significantly less than 25,637 acres. There are several reasons for this: First, it is unlikely that purchasers or exchange proponents will be found for all tracts in the disposal zone (on page 112 of the Draft it states that it is unlikley that more than 50% of the tracts could actually be sold or exchanged for this reason); second, site-specific analyses are likely to show significant public values that would preclude disposal; and third, exchange will be the preferred method of disposal. All these factors will reduce the net loss of public land.
15. In reference to the above document, we support the BLM's alternative to use land exchange as the primary method of land adjustment. We are, however, disappointed that the Plan did not identify the lands Burlington Northern has offered to dispose of in the Headwaters area. (The list was presented to you in October of 1982.) By identifying these parcels, the public has an opportunity to comment on the proposal. [Comment Index Number: 34]	15. The Headwaters RMP was designed to deal with the land ownership adjustment issue on the broad level of categorizing the land into three general categories. It was felt that individual tracts should be dealt with on a site-specific basis after the RMP was completed. For this reason, the RMP did not identify the tracts that Burlington Northern has offered for disposal. These tracts will be evaluated in the future and there will be opportunities for public involvement at that time.
16. We also request that the Plan emphasize the benefits of consolidating land ownership by showing how public and private costs can be reduced if lands are blocked up. [Comment Index Number: 34]	16. This discussion has been added to the Impacts on Social and Economic Conditions section of the discussion of Alternative A in the Environmental Consequences chapter of this document.
17. It has come to my attention that the following described lands located on Duck Creek in the Townsend MT district have been included in the isolated tract designation by the present administration and are therefore possibly slated for sale: Township 8 North, Range 3 East Section 5: Lots 14, 15 and 16 Section 6: Lots 11, 12 and 13 Township 9 North, Range 3 East Section 32: Lots 1 and 2 These lands were, by your agency, classified for public recreational purposes as recent as May 1973. This generated considerable construction and improvements on cabins by persons owning or being able to purchase cabin sites on property adjacent to the above mentioned BLM lands, thereby greatly increasing the tax base of the area. It is therefore requested that the BLM land in question be retained for public recreational purposes as it is currently designated. [Comment Index Number: 41, 43, 44, 47, 48, 57, 58, 59, 60, 66, 67, 68, 69, 70, 86, 87]	17. The area is in a retention zone. Due to valuable riparian habitat, the tracts are likely to be retained.
18. As present and impending litigation demonstrates, United States policy requires that public lands be held in perpetuity and managed exclusively under the stewardship of classified Civil Service employees. All public lands must be retained; no such lands may therefore be considered for sale or subject to any other method of disposal. As I have previously commented in rejecting proposed "disposal categories" my rationale is based on federal law expressing Congressional intent. [Comment Index Number: 42]	18. Sections 203 and 206 of the Federal Land Policy and Management Act of 1976 provide statutory authority for the BLM to dispose of tracts of public land through either sale or exchange. The criteria for the sale of public land are listed on page 21 of the Draft RMP and were taken directly out of FLPMA.

LAND OWNERSHIP ADJUSTMENT

COMMENT	RESPONSE
19. Public land in the Scratchgravel Hills should be made available for disposal via direct sale to adjoining landowners. This is surplus land as the BLM is not using this land for any purpose including no mining, so the land should be considered obsolete to BLM. [Comment Index Number: 52]	19. Sale or exchange of specific tracts is allowed in retention zones. Our general management goal however, is to retain public lands in the Scratchgravel Hills. Many of these parcels have high value for wildlife habitat, open-space recreation,and scenic value. Most large tracts have legal access. Those small tracts without significant public values can be considered for sale or exchange, but the priority for sales and exchanges will be in the disposal zones. In addition, the Scratchgravel Hills have strong public support for retention in public ownershp including support by the Scratchgravel Hills Comprehensive Management Plan prepared by the volunteer Scratchgravel Planning Committee. For these reasons, the BLM feels the Scratchgravel Hills should remain in the retention category.
20. I fail to see enough BLM land recommended for disposal or trade to take the time to bother with. If all the land of this category were disposed of at fair market value, the cost of the study and sale would not be realized. [Comment Index Number: 54]	20. The primary purpose of the land adjustment program is to provide a more manageable land ownership pattern, not to bring in revenues. Over the long term however, a more manageable land base is expected to reduce administrative costs.
21. Tracts in T3S, R9E & R10E change from "disposal" and "further study" to "retention". These tracts have significant wildlife and scenic values. [Comment Index Number: 65]	21. The retention zone has been enlarged to include the tracts along the Yellowstone River. Other Wineglass Mountain tracts will remain in further study because more information is needed before these tracts can be accurately reclassified.
22. Land ownership adjustment categories should be changed in T8N R3W and T8N R4W from retention to disposal. Also T9N R3W should be classified for disposal. These BLM lands could be exchanged or sold and consolidated. These small, sometimes landlocked parcels could be blocked up to improve management by both BLM and private ownership. [Comment Index Number: 71]	22. Sale or exchange of specific tracts is allowed in retention zones. Our general management goal, however, is to retain public lands in the three townships listed above. Many of these parcels have high value for wildlife habitat, open-space recreation, and scenic values. Most large tracts have legal access. Those smaller tracts without significant public values could be considered for sale or exchange, but tracts in disposal zones will generally receive priority for disposal. These townships should remain in the retention category.
23. T8N R9 & 10E "retain" change to retention. Reason: access to the Musselshell. T3S R9 & 10E change to "retention." [Reason:] endangered species—peregrine falcon formerly used this site and have been recorded lately. [Comment Index Number: 77, 75]	23. Tracts with value for river access will be retained, even though they lie within a disposal zone. There are only a few scattered tracts in the area of the Musselshell River and, therefore, do not justify being identified in a retention zone. Endangered species' habitat will be retained no matter what category it is in. However, the retention zone has been changed to include known peregrine sites along Yellowstone River. Also, see the response to Comment Number 2.
24. Public Land in T13N R3E should be changed from disposal to retention because of high public values and importance to livestock operations. [Comment Index Number: 88]	24. This area has very few tracts of public land and legal public access to these tracts is limited. For these reasons, the area has been identified for disposal. However, the RMP provides for individual tracts within disposal zones to be retained if site-specific analysis reveals significant public values.
25. My only comments deal with a very deep concern for the hundreds of small miners, prospectors, widows of prospectors, or beneficiaries of miners/prospectors, & leasers of mineral claims. These people can be badly hurt mentally & Spirtually if their Forest Service and B.L.M would sell them out. [Comment Index Number: 89]	25. Current policy does not allow sale of surface rights where mining claims are located. If the policy changes, previously existing claims would be considered valid existing rights. Only future mineral entry would be precluded.

TABLE 7-3 (cont.)

MINERAL EXPLORATION AND DEVELOPMENT

COMMENT	RESPONSE
1. The MEC generally endorses Alternative A, the preferred alternative, because it provides a generally balanced approach to the identified issues. However, on the issue of withdrawals, Alternative D is preferable. Land withdrawal is a very rigid form of land use management, and in the case of withdrawal to prevent anticipated damage caused by exploration activities, the withdrawal is not necessary. Exploration by modern techniques can be carried out with minimal impact and most of that can be reduced by reclamation. Withdrawal should be used as a management tool as infrequently as possible. [Comment Index Number: 24]	1. Current policy is to rely on existing federal and state regulations for the regulation of mining activity rather than rely on withdrawals. Neither Alternative A nor Alternative D propose any new withdrawals. Under either alternative, the acreage withdrawn from mineral entry is expected to decrease because of the Withdrawal Review program. In short, Alternatives A and D are identical with respect to mineral withdrawals.
2. The BLM asserts that the Preferred Alternative would result in no change from current management direction with respect to mineral exploration and development, as all public land would remain available for entry, unless previously withdrawn. In addition, some existing withdrawals may be revoked in the future as the current withdrawal review continues. However, site-specific stipulations applied to activities within specially designated areas may make exploration impractical if not impossible. [Comment Index Number: 35]	2. The BLM does not attach site-specific stipulations on locatable mineral activities within specially designated areas such as outstanding natural areas. Locatable mineral exploration and development are regulated through the 43 CFR 3809 Surface Management Regulations, and activities are regulated only to prevent unnecessary and undue degradation.
3. Due to the large amount of fractured rock and the large number of faults running through the Scratchgravel Hills area, the chance of groundwater contamination is very high if an accident or mishandling of the cyanide was to occur. Therefore, I would recommend that Alternatives "A", "B" and "D" be amended to withdraw the Scratchgravel Hills from mining or at least create a buffer zone between the residential areas and the mining. Also, that no onsite processing of the ores be allowed anywhere in the Scratchgravel Hills. [Comment Index Number: 49, 37, 63]	3. Current policy is to rely on existing federal and state regulations for the regulation of mining activity rather than rely on withdrawals. As mentioned in the plan, a withdrawal would not solve the potential problem of mining claims with valid existing rights and mining on patented mining claims. The Bureau of Land Management has no means of specifying either the location or the methodology of mineral recovery and processing. In addition, since the only current cyanide leaching operation is located in a different groundwater recharge zone from nearby rural subdivisions, the potential for the contamination of groundwater used for domestic purposes is significantly reduced.

MOTORCYCLE USE AREAS

1. Care should be taken to avoid conflict between [Continental Divide] Trail users and motorcycle users in the Marysville area. [Comment Index Number: 19]	1. The possible impacts on Continental Divide trail users will be one factor in evaluating any application for a motorcycle race event in the Marysville area. In addition, as shown on page 22 of the Draft RMP/EIS, Marysville has been identified as a high priority for possible restrictions on motorized vehicles.
2. Why should public land be used for motorcycle racing? I feel that they should do as we (M4X4A) do. Rent some PRIVATE land for such types of activity. It gives the people who want to see it a chance to do so, and those who don't an don't care a chance not to. [Comment Index Number: 27]	2. Public Law 94-579, the Federal Land Policy and Management Act of 1976 (FLPMA) states that "... the public lands be managed in a manner ... that will provide for outdoor recreation ... (Sec. 102 (a)(8)) and that "The Secretary shall manage the public lands under principles of multiple use ... (Sec. 302 (a)). Multiple use, by definition, means "... the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people ..." (Sec. 103 (c)). Motorcycle racing as well as four-wheel drive events are forms of multiple use and outdoor recreation, and therefore, can legally be accommodated on public lands provided that precautions are taken to prevent unnecessary and undue degradation.

MOTORCYCLE USE AREAS

COMMENT	RESPONSE
3. Allowing motorcycle events in the Black Sage area is inconsistent with the wilderness values present there. See p. 115. Prohibition should be considered to mitigate the noise, erosion and concentration of people which these events cause. [Comment Index Number: 30]	3. It is not felt that the wilderness values in the Black Sage area are sufficient to justify closing it to motorcycle race events. The possible impacts of such events were considered in the decision to recommend the Black Sage area as nonsuitable for wilderness. However, the current demand for motorcycle use areas is relatively low, and it is unlikely that there will be a high demand for the Black Sage area as a motorcycle use area.
4. No organized motorcycle events should be allowed in the Scratchgravel Hills area. The land, vegetation and wildlife in the area are too fragile for a motorcycle event and the increased year round use of the area by motorcylists that would result. Motorcycle races are also incompatable with many of the other recreational uses of the area such as horseback riding and are incompatable with the general rural residential atmosphere of the surrounding areas. Alternatives "B" and "D" should be amended to exclude organized events. [Comment Index Number: 49, 14, 63]	4. Under the preferred alternative, Alternative A, the Scratchgravel Hills would be closed to motorcycle race events.

MOTORIZED VEHICLE ACCESS

1. Management Unit 9. The deer-elk winter range values are very high in the portions of this unit that are adjacent to our Elkhorn Wildlife Management Unit and [we] endorse the preferred alternative that allows for restrictions on motorized access. These BLM lands are important to the total wildlife habitat in the Elkhorn area and hope that more specific road management guidelines can be developed. We will supply all resource information we have and work with BLM land managers in developing these guidelines. We support the effort to improve conditions in the Devils Fence Allotment. [Comment Index Number: 2]	1. Management Unit 9 has been identified as a priority area for motorized vehicle access restrictions. Specific management guidelines affecting motorized vehicle access will be developed during travel planning and will be incorporated into other BLM activity plans. The BLM intends to work closely with the Forest Service to develop a joint travel plan for public lands that adjoin national forest lands.
2. .As a member of an organized 4-Wheel Drive Club I feel no land should be closed to MOTORIZED VEHICLE ACCESS. I also do see reasoning behind Closing it to seasonal demands for the area. I am not familiar with the Scratchgravel Hills, Hilger Hills or Limestone Hills, but surely they can be controled as many areas are by seasonal closures. Isn't that what travel plans are for? [Comment Index Number: 27]	2. Under FLPMA, Executive Order 11644, and Executive Order 11989, controls on motorized use of public lands are authorized. Generally, these controls minimize damage to soil, watershed, vegetation, or other resources of the public land and conflicts with other uses. Seasonal controls will meet these requirements in many cases. However, in other situations, specific needs can only be met with more restrictive motor vehicle closures. As detailed for the preferred alternative on page 39 of the Draft, none of the three referenced areas are proposed for closure. Scratchgravel Hills and Limestone Hills would be identified for motor vehicle restrictions. Hilger Hills would remain open to motorized vehicles and would also remain available for further consideration for organized motorcycle events.
3. The proposed plan calls for 219,000 acres (where erosion and land use conflicts presumably exist) to be "prioritized for restrictions" (p. 40). However, no specific restrictions are proposed, no clear explanation of why these areas have been chosen or where they are located is given, and there is inadequate analysis of the environmental impacts on the different acreages proposed for restrictions under each alternative (see Environmental Impacts section). [Comment Index Number: 32]	3. Pages 22 and 39 of the Draft RMP identify specific areas that will receive priority for motorized vehicle restrictions. These areas include the Scratchgravel Hills, the Limestone Hills, Blind Horse Creek, Ear Mountain, Chute Mountain, Deep Creek/Battle Creek, Sleeping Giant, Marysville, and the Jefferson, Missouri and Smith River corridors. As explained on page 22 of the Draft RMP, more detailed travel planning will take place after the RMP is completed. This planning effort will identify site-specific restrictions and environmental impacts. Most of the areas listed above were identified in previous plans as areas that needed restrictions. Some areas were identified on the basis of public comment during the scoping process.

TABLE 7-3 (cont.)

MOTORIZED VEHICLE ACCESS

COMMENT	RESPONSE
4. Motorized vehicle use in the Scratchgravel Hills area should be restricted to designated existing roads in the area. The environment in the area is too fragile for off-road vehicle use. There are numerous examples in the hills where off-road vehicles have traversed an area only once and several years later the tracks are still evident. These tracts tend to channel rainwater which results in even greater erosion and destruction of the natural vegetation. [Comment Index Number: 49, 63, 40]	4. Under the Preferred Alternative, the Scratchgravel Hills are identified as a high priority area for motorized vehicle restrictions. Upon completion of the RMP, more detailed travel planning will take place to determine what specific restrictions should be placed on motorized vehicle use not only in the Scratchgravel Hills but elsewhere in the Resource Area as well.

UTILITY AND TRANSPORTATION CORRIDORS

No comments were received on this issue.	

COAL LEASING

1. Review of the RMP/EIS indicates several Minuteman launch control and launch facilities within the Headwaters Resource Area. The hardened intersite communications cable system also passes through areas identified as private surface ownership and public land declared acceptable for further consideration for coal development. The Malmstrom AFB Cable Affairs Officer has discussed the hardened intersite communications cable routing with your Great Falls field office. It is the Air Force understanding that the Great Falls Field Office plans to annotate the location of the cable on their working drawings and coordinate with the Cable Affairs Officer whenever an oil/gas lease application is received which could impact on the hardened intersite communications system or a launch control/launch facility. [Comment Index Number: 3]	1. Language has been added to the analysis of Criterion No. 2 in Appendix H that provides for future identification of areas unsuitable for surface occupancy and/or unsuitable for leasing in order to provide necessary protection for the hardened intersite communications cable system. Oil and gas lease stipulations required for the mitigation or avoidance of impacts on special land uses, including the hardened intersite communications cable system, are developed through completion of the realty portion of Supplemental Sheet 2, Butte District Oil and Gas Checklist, found in Appendix B.
2. We have reviewed the application of the unsuitability criteria on the federal mineral estate within the Great Falls Coal Field. We believe that the rationale used in the draft document for application of several or the unsuitability criteria are not consistent with regulations pertaining to the management of federally-owned coal (43 CFR 3400) and may result in unnecessary conflict or delays if leasing of these coal reserves is initiated in the future. Analysis for Criterion No. 11 in Appendix H documents the limited data available on golden and bald eagle nest sites in the planning area. A lease stipulation requiring additional raptor survey is recommended. In our opinion, issuing a lease with a stipulation requiring additional inventory does not meet the cited regulations. Adequate inventory and application of Unsuitability Criteria No. 11 prior to issuance of the lease is required. Rationale expressed in the draft planning document for Unsuitability Criteria No. 13 and No. 14 suggesting inventories of cliff sites at the time of leasing for criteria No. 13 and leases with stipulations requiring inventorities of high priority habitat for migratory birds of high Federal interest for Criteria No. 14 also do not appear to be consistent with the coal planning regulations. These inventories and subsequent application of unsuitability criteria are necessary and are required prior to issuance of Federal coal leases. [Comment Index Number: 6]	2. Additional information and inventory data has not been collected for the following reasons: The coal area is not in a coal production region and no tracts have been delineated. High and moderate value coal has not been identified; the land is classified as prospectively valuable for coal. Strong interest in developing the coal has not been indicated. Funding and staffing constraints limit the amount of inventory work the BLM is able to do. For these reasons, although some delay will result, the logical time to gather additional inventory data would be at the lease application time or when someone is interested in making an application. Even if the inventories are delayed until this time, they will be completed, along with the final application of the unsuitability criteria, before a lease is actually issued. This approach complies with regulations (see 43 CFR 3461.3-1(6)(1)) that allow for the final application of unsuitability criteria after an RMP is done as long as the application of criteria takes place prior to lease issuance. Appendix H has been modified to clarify the fact that all unsuitability criteria will be applied prior to lease issuance.

COAL LEASING

COMMENT	RESPONSE
3. It seems illogical to lease the Great Falls coal field at a time when the demand is so low. It seems wise to take more time to study the impacts of leasing this coal before moving forward. Leasing this coal, along with possible development, has the potential to seriously affect the Smith River. [Comment Index Number: 20]	3. The preferred alternative does not propose leasing of the Great Falls coal field at this time. Rather our preferred alternative proposes that all federal coal would be available for further consideration for coal leasing. There is little interest in the Great Falls coal field and the BLM does not anticipate any actual leasing in the near future.
4. The potential for viable production and the effects of coal production in the Great Falls Coal Field are spread throughout the DEIS. These factors should be consolidated and coal leasing reconsidered in that light. The factors are: 1. Removal of the coal may prove to be costly and difficult—page 60. 2. Due to high sulpher and ash content the quality of the coal is poor—page 90. 3. The production potential of the area is questionable—page 60. 4. Production will adversely affect air quality and brings with it the potential of acid rain the Great Falls areas—Page 109. 5. Production may cause cyanide leaks in Helena Valley resources which are used by some homeowners for domestic water—page 110. Consideration of these factors makes justification of coal leasing in the Great Falls Field difficult. [Comment Index Number: 30]	4. As stated on page 109 of the Draft RMP/EIS it is not coal production that brings with it a potential for acid rain, but rather the possible construction of a coal fired power plant (such as Montana Power Company's Salem Project). Possible cyanide contamination is not related to the Great Falls coal field. It could, however, result from gold mining and leach pad operations in the Helena Valley and Scratchgravel Hills. This has been clarified in the RMP (See also response to Comment Number 3.)
5. Further, it is impossible to determine from the DEIS whether the no surface occupancy stipulations proposed for the Great Falls Coal Field and mentioned in Criteria No. 15 of Appendix H create unusable islands of land. To provide viable habitat for the sharp-tailed grouse, elk, antelope, and mule deer proper buffers and corridors must also be provided for. [Comment Index Number: 30]	5. The Great Falls Coal Field map located in the back of the Draft RMP/EIS should help your evaluation of the coal field impacts to wildlife habitat. In the opinion of the BLM specialists, the 1,260 acres of No Surface Occupancy, designated because of wildlife criteria (Unsuitability Criterion 15), would not create unusable islands of wildlife habitat. Exclusions for sharp-tailed grouse dancing grounds (twenty acres each) may be an exception. This grouse species may experience severe short-term impacts if the coal resource is mined. The important thing to remember, however, is that the Draft RMP/EIS only determined that the area under consideration is acceptable for potential coal development, pending further study (Appendix H). The BLM has very little wildlife inventory data for the coal field area because of limited public surface ownership in the area. Future development of the coal field would necessitate wildlife inventories; these inventories could add considerable acreage to the No Surface Occupancy area already delineated. Application of unsuitability criteria 9, 10, 11, 12, 13, 14, and additional application of criterion 15 would occur prior to lease issuance. In addition because of the scattered nature of the public surface and subsurface ownership, it might not be possible to provide proper buffer zones for wildlife if the adjacent private coal were mined.

TABLE 7-3 (cont.)

COAL LEASING

COMMENT	RESPONSES
6. Similarly, although underground coal mining could seriously disrupt ground-water (p. 110), all federal coal within the Great Falls Coal Field is available for further consideration for coal leasing in the preferred plan, which relies on future, unspecified lease stipulations and mine plan review to prevent groundwater resource problems (p. 53). Regulations themselves are not a mitigating measure, and no analysis supports the conclusion that BLM need do nothing but rely on existing regulations. [Comment Index Number: 32]	6. Since there are no mining proposals or tracts identified, effects on groundwater would be hard to analyze. Prior to leasing, an EA or EIS would be required. At the time that a mining proposal has been identified, the groundwater question could be analyzed in greater detail. When a mining plan is reviewed the opportunity for additional mitigating measures are available, and if necessary, stipulations to prevent damage to groundwater would be written. State or federal review of the mining plan is required, and the State of Montana prepares an EIS. Public hearings are held prior to approval of a mining plan.
7. In addition it would appear the RMP/EIS does not adequately present nor answer the coal leasing issue presented on p. 12; that is, what portion of the Great Falls Coal Field should be made available for further leasing? No alternatives of leasing any portion of the coal field were analyzed—only to lease all the field or none. [Comment Index Number: 32]	7. It is BLM policy to make coal available for leasing unless analysis reveals compelling reasons not to lease coal. Current information suggests that the coal in the Great Falls coal field is highly irregular in occurrence. There is little industry interest in the Great Falls coal field and the BLM does not anticipate any actual leasing in the near future. It is important to realize that the treatment of the Great Falls coal field serves only as a preliminary screening. The preferred alternative proposes that all federal coal be available for further consideration for leasing. It does not propose any actual leasing. See also the response to Comment Number 3.
8. The analysis of No. 3 states subsidence and tension cracks in roads can be repaired so that road conditions are equal to or better than those existing. We know of no evidence supporting this in the underground coal fields of Colorado and Utah; in fact, experience indicates the opposite is true. [Comment Index Number: 32]	8. The actual potential for subsidence caused by underground mining cannot be determined in the absence of a specific mining plan or proposal. However, the depth of the overburden (200 to 300 feet) suggests that subsidence generally can be avoided through proper design of the mining operations.
9. Criterion No. 16 states 100-year flood plains "shall be considered unsuitable unless" it is determined substantial damage is not threatened by mining; however, the analysis improperly reverses the criterion, leaving three floodplains as suitable for mining until proven unsuitable. [Comment Index Number: 32]	9. You are correct in that the BLM analysis reversed the requirement in the regulation. It should be stated to the effect that these areas are unsuitable unless it can be established that surface mining or facilities do not pose a threat to life or property. Given the underground mining exemption (43 CFR 3461.2), this will not prevent leasing of these areas for underground mining. It would prevent placement of surface facilities in the floodplain. The analysis in Appendix H has been revised to reflect this fact and the appropriate changes have been incorporated into the text.

SPECIAL DESIGNATIONS

1. The Headwaters Resource Area contains one designated and 12 potential National Landmarks. . . . Further planning for the Headwaters Resource Area should consider these official and potential designations and avoid impacts that could adversely affect the ecological and geological features of these areas. [Comment Index Number: 8]	1. Of the designated and potential National Natural Landmarks, there is no BLM-administered surface or subsurface on six: Crown Butte; Granite Peak Glaciers; Crazy Peak-Big Timber Creek; Red Mountain; Green Timber Basin-Beaver Creek; and the Gates of the Mountains. The BLM does have administrative responsibilities for surface and/or subsurface resources on at least portions of the following sites: Freezeout Lake, Pine Butte Swamp, Sun River Game Range, Sluice Boxes State Monument, Middle Fork Canyon, Lewis and Clark Caverns, and Dry Hollow. The eligibility of these sites will be considered when making activity decisions regarding the specific areas.

SPECIAL DESIGNATIONS

COMMENT	RESPONSE
2. I found the discussion of the ONA concept one of the most disappointing aspects of the Headwaters plan; the concept was discussed as if it were readily understood by all, an administrative management tool commonly used. To the best of my knowledge it's not, and as a person who commonly follows these issues, I must confess to not fully understanding what can and can't be done in an ONA, nor how quickly one can be changed or undone. Certainly all of these questions should have been answered in full in the DEIS; if they were, I couldn't find them. [Comment Index Number: 20, 40]	2. The BLM has authority to make several types of special designations. These special designations are administrative designations that must be approved or rescinded by the Director of the BLM. They are defined in 43 CFR 2070. An Outstanding Natural Area is one of these designations. The purposes of Outstanding Natural Areas are defined in 43 CFR 2070. This regulation states that ONAs are "areas of outstanding scenic splendor, natural wonder, or scientific importance that merit special attention and care in management to insure their preservation in their natural condition. These usually are relatively undisturbed, representative of rare botanical, geological, or zoological characteristics of principal interest for scientific and research purposes." The general management policy for ONAs is contained in 43 CFR 8352 which says, in part, that "no person shall use, occupy, construct, or maintain authorized facilities in a manner that unnecessarily detracts from the outstanding natural features of the area." As can be seen, the regulatory direction, although not detailed, is clear in its intent to preserve the natural features of an area. The Headwaters RMP/EIS has provided additional management direction that is intended to preserve the natural character of these areas (see Chapter 2 and Management Units 3 and 4 in Appendix A).
3. An ONA classification based on speculative energy values seems like flimsy protection for areas with such proven wilderness and wildlife values. [Comment Index Number: 20]	3. Nonwilderness recommendations were made for these three areas based on the BLM's Wilderness Study Policy. Energy concerns were only one of many factors. ONA designations were recommended as a follow-up in order to protect the high natural and wildlife characteristics of the three areas. Over the short term the protection provided by ONA designation will be similar to that provided by wilderness designation.
4. The designation of these areas as outstanding natural areas and management essentially as wilderness will affect timber harvest opportunities to a small degree, but—I mean on a small acreage, the forest land. However, the impact on the potential yield appears to be minimal. [Comment Index Number: 23]	4. Since there is no commercial forest land in the three areas recommended for ONA designation, there will be no impact on timber harvesting.
5. Although the ACEC recommendation for Sleeping Giant is definitely a step in the right direction the MWA strongly recommends wilderness management for this unique wild area. I personally use the area extensively for day hikes and have never failed to see wildlife there ranging from antelope to mountain goats. A Sleeping Giant Wilderness would complement beautifully the adjoining Gates of the Mountains Wilderness as well as the BLM's commitment to resource protection along the Missouri River from its headwaters to the Wild & Scenic Missouri all the way [to] Fort Peck. The Montana conservation community has based much of its support for the recent 3-way Sleeping Giant land exchange on the hope that the area would eventually receive wilderness classificaiton. With this thought in mind, we urge you to recommend wilderness for Sleeping Giant even though the area has technically been dropped from section 603 FLPMA wilderness consideration. Of course, we feel strongly that the dropping of this potential WSA was based on a legally-flawed interpretation of FLPMA and other applicable laws. [Comment Index Number: 28]	5. Instruction Memorandums WO-83-188 and MT-83-160 mandated the deletion of all split-estate lands from further wilderness study whether under Section 603 or 202 of FLPMA. When the BLM acquired lands in the recent Sleeping Giant exchange, the agency did not obtain subsurface rights to 2,207 acres. Subtracting these areas created 1,553 acres of noncontiguous land. As a result the WSA lost 3,760 acres and was reduced to only 2,371 acres. This is far less than the 5,000 acres needed for wilderness consideration and the area was dropped from further study. Over the short term ACEC designation will provide similar protection as wilderness designation.

TABLE 7-3 (cont.)

SPECIAL DESIGNATIONS

COMMENT	RESPONSES
6. While none of the five areas under consideration would be recommended for wilderness designation, we are concerned that four areas along the Rocky Mountain Front—Blind Horse Creek, Ear Mountain, Chute Mountain, Deep Creek/Battle Creek—are recommended for Outstanding Natural Area designation. Statements in the plan such as the following illustrate the reason for this concern: "Special designation will permit essentially the same level of protection for scenic, recreational, and other values that wilderness designation would provide." Such stringent protection would obviously constrain energy development. The areas recommended for ONA status are believed to have very high oil and gas potential, and should not be effectively closed to development. [Comment Index Number: 35]	6. While it is true that ONA designations would place severe restrictions on oil and gas development, approximately 72% of the BLM-administered land on the Rocky Mountain Front is still available for oil and gas development. Of the 28% that is considered unavailable, only 8% or 9,960 acres, is unavailable as a direct result of ONA designations. The RMP interdisciplinary team believes that this represents a reasonable balance between the many outstanding and competing resource values of the Rocky Mountain Front.
7. Nowhere does the RMP/EIS adequately explain why the WSAs were only considered for ONA designation, and not for ACEC status. [Comment Index Number: 32]	7. A discussion of why ACEC designation for the areas on the Rocky Mountain Front was not presented in detail can be found on page 18 of the Draft RMP/EIS. In brief, the reason is that ACEC designation and ONA designation would result in very similar management of the areas. It was felt that an ONA designation would be more appropriate since the resources of particular interest are of national significance and an ONA designation requires approval of the Director of the BLM.
8. We are pleased that the BLM recognizes the special values of these three areas, as signified by the proposed Outstanding Natural Area designation. But at the same time we recognize this is only administrative protection, and it lacks the permanence and force of law a Congressional designation would have. We're particularly concerned about the potential impacts of oil and gas exploration and development, and the ONA designation gives us little security from that threat. [Comment Index Number: 39, 28]	8. Although the ONA designation for the three areas does not provide the same long-term protection guarantee as wilderness would, it does provide comparable short-term preservation (ten years). If wilderness is an issue in the next plan and the adjacent national forest land is designated or recommended for wilderness, then the option would be available to reevaluate these areas for wilderness. Because of the valid existing rights in the form of pre-FLPMA oil and gas leases, neither wilderness designation nor ONA designation can guarantee absolute preservation. No Leasing or No Surface Occupancy stipulations will be put on new leases, however, to protect natural values.

SOIL, WATER, AND AIR RESOURCES

1. Although we agree with the EIS that air quality impacts from your proposed alternative would generally be minimal, we would point out that production of "sour" gas found in this area might well require a sweetening plant. Such facilities would have to be carefully scrutinized, especally in light of the designation of the Bob Marshall Wilderness Area as a Class I airshed. We believe this should be mentioned in the final EIS. [Comment Index Number: 11]	1. A statement to this effect has been added to the Final RMP/EIS.
2. Appendix C states that the Best Management Practices were selected to avoid rather than mitigate impacts to water quality and soils. The prevention of adverse impacts is clearly desirable, but, mitigative measures should also be developed in case adverse impacts do occur. [Comment Index Number: 13]	2. The mitigating measures are usually developed on a case-by-case basis, as called for by potential adverse impacts of an action. Such mitigating measures will therefore be developed for individual actions through the BLM's normal environmental assessment process.

SPECIAL DESIGNATIONS

COMMENT	RESPONSE
3. On pages 48-50, Table 2-16, the impacts to soil and water resources range from minor deterioration to moderate-high improvement. However, riparian, waterfowl and fisheries habitat range from a major decrease to minor increase. How can soil and water resources experience improvements and habitats deteriorate? [Comment Index Number: 13]	3. Table 2-16 may not have been as clear as it should have been. The existing condition of fish and wildlife habitat presented in Table 2-16 (pages 49-50) consists of acres and miles in unsatisfactory condition. So, when watershed condition improves, there may be a decrease in unsatisfactory riparian habitat; that is, the habitat will improve. The table was set up in this way to point out how much habitat was in unsatisfactory condition and what the RMP would do about it.
4. Grazing management, oil and gas development and coal mining are concerns for water quality impacts. Streambank protection should be considered when evaluating grazing allotments. Oil and gas development should consider stipulations for wastewater and sludge disposal in areas where surface and ground water will not be polluted (reference Montana Surface Water Quality Standards—16.20.601 and Montana Groundwater Standards—16.20.1003). [Comment Index Number: 13]	4. Streambank and riparian condition were considered in the alternatives in the resolution of issue #2. Riparian condition was one of the criteria used in classifying grazing allotments into M, I, or C categories. In response to the issue, specific allotment resource management objectives have been derived to improve conditions in specified areas. Disposal of wastewater and cuttings is controlled by Oil and Gas Operating Orders #1 and #2 (formally Notice to Lease 6 and 2B). These orders specify to the lessee what procedures must be followed to ensure compliance with applicable state and federal laws and regulations. All operators must have a satisfactory program for the disposal of wastewater and cuttings prior to approval of an application for a Permit to Drill.
5. The EIS states that under the preferred plan, "BLM would try to prevent, rather than mitigate the degradation of water quality . . . by reviewing activities before thay happen, and following applicable laws and regulations . . ." (p. 110). However, a closer analysis reveals that the preferred plan in fact contains no such concrete preventive measures for identified and potential sources of water degradation. [Comment Index Number: 32]	5. Prevention of deterioration of our soil and water resources is preferred over mitigation. The Best Management Practices in Appendix C of the Draft RMP have been adopted by the Montana Statewide 208 Planning organization and other soil and water professionals in state and federal agencies in Montana to prevent or minimize impacts to soil and water resources. These best management practices are used in conjunction with existing state and federal regulations. However, individual actions must still be evaluated on a site-specific basis (through the BLM's environmental assessment program) to determine if any additional preventative or mitigative measures should be applied.
6. The RMP/EIS contains no support or explanation for the conclusion that "(t)here will be approximately a 2,000 acre decrease in unsatisfactory watershed conditions . . . based on changes in grazing allotment management" (p. 111), and no attempt is made at reaching a similar estimate of the total cumulative effect of all other activities under each alternative. [Comment Index Number: 32]	6. The 2,000-acre figure is the best estimate of the impacts on watershed conditions as a result of changes in grazing allotment management. It is based on the resource conditions of the allotments, the potential for the resources in the allotments to respond, and the opportunities and objectives for the allotments. However, since specific allotment management plans that specify grazing systems, stocking levels, and improvements will not be developed until later; it is not possible to give an exact figure for the impacts on watershed. The 2,000-acre figure may increase or decrease slightly once the AMPs are implemented.

TABLE 7-3 (cont.)

WILDLIFE AND FISH RESOURCES

COMMENT	RESPONSE
1. Our concern is that a major fault of the planning process and the document arose because endangered species were not identified as an issue during the "issue driven" planning process, and hence, no goals for these species or their habitats over the planning period are presented in the plan. Lacking these goals, the plan is unable to describe these habitats in any detail. Therefore, resources cannot be allocated directly for management and improvement of those seasonal or year-long habitats of importance to endangered and threatened species in the planning area over the life of the plan. [Comment Index Number: 6, 13]	1. The main reason that issue identification did not indicate threatened and endangered species as an issue is because their habitat is an integral part of several other issues. In particular, the oil and gas, grazing, timber, and wilderness issues address wildlife habitat and focus on any threatened and endangered species impacted by development or use of these resources. Having threatened and endangered species as a separate issue would have been a repetition of information already in the plan. Threatened and endangered species need not be identified as a separate issue in order to receive careful consideration and management. Several actions are identified in the plan that will directly benefit their habitat. The unleased grazing reservations (Table 2-1 of the Draft RMP/EIS) will maintain riparian habitat for the direct benefit of threatened and endangered species. Likewise, the ONA designations in the preferred alternative and the RMF oil and gas stipulations also provide protection. Goals for threatened and endangered species' habitat shaped the substance of the preferred alternative as did other resources not identified as issues. The habitat of threatened and endangered species will be addressed in greater detail during activity planning.
2. The final step needed is the identification and use of various criteria which will be followed in resource use prescriptions to evaluate both case-by-case and area-wide development actions in the future. By establishing these procedures and criteria now, we can then assess whether the action proposed in the RMP/DEIS is or is not likely to affect endangered or threatened species over the long-term. Moreover, funding and manpower resources can be identified in advance of development so that EAR's and other site review processes can be adequately accomplished. [Comment Index Number: 6]	2. The resource management guidance and decision criteria needed to assess impacts on threatened and endangered species are described in Chapter 2 and include provisions for consultation with the Montana Department of Fish, Wildlife, and Parks and the U.S. Fish and Wildlife Service prior to implementing projects that may affect habitat of threatened and endangered species. Of primary importance to grizzly bear and gray wolf habitat is the guidance provided for resolution of the oil and gas, grazing, and motorized vehicle access issues along the Rocky Mountain Front.
3. We hope that the biological assessment serves as a mechanism for evaluating and documenting the endangered and threatened species goals, objectives, and management direction for this resource area. We recommend that BLM incorporate this information into the RMP/FEIS. Upon completion of your assessment, if you determine that the project will affect any of the . . . listed species, formal consultation with the FWS through my office should be initiated. Section 7(d) of the Act requires that during the consultation process, the Federal agency and the permit or license applicant shall not make any irreversible or irretrievable commitment of resources which would preclude the formulation of reasonable and prudent alternatives. [Comment Index Number: 6, 7]	3. The Biological Assessment will be forwarded to the U.S. Fish and Wildlife Service. The document will be available for public review in the Headwaters Resource Area office in Butte.
4. We note that there is a discrepancy between figures presented in the body of the RMP/DEIS and reference to data contained in Figure 3-3. [Comment Index Number: 6]	4. You are correct, there is a discrepancy between the text and Figure 3-3. The correct figures for grizzly bear are as follows: total satisfactory habitat is 12,882 acres, total unsatisfactory habitat is 8,588 acres, and total occupied habitat is 21,470 acres. Total riparian unsatisfactory habitat is 3,778 acres or 44% of unsatisfactory grizzly bear habitat This change has been made in the Final RMP/EIS.

WILDLIFE AND FISH RESOURCES

COMMENT	RESPONSE
5. The BLM should . . . consider purchasing or trading for tracts of land known to be critical to threatened and endangered species. The Endangered Species Act directs federal agencies to take all actions necessary to recover species, and acquiring land seems like a logical action to take. [Comment Index Number: 20]	5. Acquisition of wildlife habitat, including that of threatened and endangered species, is one of the important goals of an exchange program.
6. It's simply not enough to say that once the range is in good or excellent condition, everything will be fine for wildlife, because it isn't true. This plan fails to quantify in any way the quality and relative abundance of various kinds of wildlife habitat in the Headwaters Area. [Comment Index Number: 20]	6. Table 3-9 on page 97 of the Draft RMP shows the total acres of BLM habitat, the percent of that habitat in satisfactory condition, and the percent in unsatisfactory condition for mule deer, elk, bighorn sheep, moose, grizzly bear, antelope, mountain goat, waterfowl, and sage grouse. For each of these species, where appropriate, the habitat is further divided into winter/spring, summer/fall, and yearlong habitat. Tables 4-4, 4-10, 4-12, and 4-16 in the environmental consequences chapter show the projected acres of satisfactory and unsatisfactory habitat by alternative for each of the species and types of habitats listed above. Table 2-16 summarizes this information for all alternatives.
7. The document in presenting the alternatives and in stating the management practices intended to be common to all the alternatives, while recognizing the importance of populations of endangered and threatened species, appears to generally relegate their maintenance to that of being but another use of the public lands. Legally, their maintenance should clearly take precedence over other uses. Other uses would in areas of concern be allowable if determined after careful study to be compatible. The plan, we feel, should be revised so as to clearly state the precedence of management of endangered and threatened species. Such revision should also be reflected in the alternatives. Currently, the summary of the consequences of the alternatives indicates that there would be negative impacts on the identified populations of endangered and threatened species. The legal precedence of management of these populations is such that none of the alternatives should result in negative impacts to the populations. [Comment Index Number: 25]	7. The main purpose of the Endangered Species Act (1973, as amended) is to protect and conserve listed species. With regard to federal agencies and this RMP/EIS, the act specifies three legal requirements. One is that agency actions do not cause any destruction or adverse modification of threatened and endangered species or their habitats. Second, the agency must not only maintain listed species and their habitats but aid in the recovery of these species to nonthreatened or endangered status. Third, section 7 of the ESA requires federal agencies to consult with the U.S. Fish and Wildlife Service for any action that may adversely impact a listed species or its habitat. This requirement includes consultation on land use plans and on specific actions resulting from these plans if either stands to impact threatened and endangered species. In Alternatives A and C, especially in the Rocky Mountain Front recommendations, the plan provides more than minimal protection for threatened and endangered species and their habitats. The BLM is currently consulting with FWS on the RMP.
8. We would like to note the excellent knowledge on fish and wildlife shown in the document; however, to make the information presented in the document more meaningful to the reader (and presumably, to the rest of the BLM planning team) the RMP/EIS should include information on crucial winter habitat, wildlife populations, and the relationship of public lands (administered by BLM) to the surrounding areas (administered by state, other federal agencies or private owners) with respect to wildlife habitat and populations. [Comment Index Number: 32]	8. Information on wildlife populations was not presented in the RMP for several reasons. Accurate data on wildlife populations are not available for many portions of the resource area. Many factors other than management actions, such as weather, hunting success, etc., can influence population levels. The BLM is charged with managing habitat. For these reasons the plan addresses habitat condition rather than direct impacts to wildlife populations. Our analysis of wildlife habitat did involve the identification of crucial habitat although it was not specifically identified in the document. The categorization of grazing allotments, the establishment of no surface occupancy stipulations for oil and gas, the designation of areas where no oil and gas leasing would be allowed, and establishment of areas where timber harvesting would be restricted all involved the consideration of crucial wildlife habitat. The BLM recognizes the importance of the relationship between different land ownerships with respect to wildlife habitats and populations. In general, public lands within the resource area contain winter and spring habitat for big game species. This is particularly true of crucial habitats.

WILDLIFE AND FISH RESOURCES

COMMENT	RESPONSE
9. The EIS also lacks any specific forage allocations for wildlife or non-consumptive uses. It states that "sufficient" forage will be provided for wildlife (p. 29) but never identifies how many AUMs will be reserved for wildlife, either in the entire area or in particular allotments. Given the specific forage allocation proposals for livestock, it appears that the Bureau will first allocate forage to livestock and the remainder, if any, will be available for wildlife and non-consumptive uses. This approach is unacceptable. The EIS should make specific forage allocation proposals for uses other than livestock grazing in order to ensure that "sufficient" forage is available for such uses. [Comment Index Number: 33]	9. The Draft RMP/EIS does not identify specific forage allocations, expressed in AUMs, for wildlife or other nonconsumptive uses. However, the RMP does include several provisions to ensure these needs are met: (1) Key tracts of public land will remain unleased for grazing use (see Table 2-1). Many of these tracts are being reserved primarily for the benefit of important wildlife species. (2) The methodology used to determine stocking rates for livestock allows for a significant proportion of total vegetative production to remain available for other uses. Projected stocking rates for livestock are based on guides developed by the Soil Conservation Service through input from soil scientists, range conservationists, and wildlife biologists. Wildlife were considered on an individual range-site basis during the development of these guides to ensure that habitat needs, as well as watershed needs, are met. (3) Wildlife habitat condition ratings and objectives found in Appendix E reflect needed livestock adjustments including adjustments in stocking rates. The target level stocking rates for these allotments provide for maintenance or improvement of wildlife habitats. (4) The wildlife objectives established in the RMP will be implemented in activity plans that incorporate the needs for forage and cover specific to areas of primary wildlife use. (5) Grazing allotments will be monitored to determine if stocking levels meet RMP and activity plan objectives. Monitoring will include analysis of such factors as actual livestock use and range condition. In summary, the RMP addresses the overall habitat requirements of wildlife, which include an adequate supply of forage as well as cover, space, and other requirements. The adequacy of present management practices has been evaluated from an overall wildlife habitat viewpoint. Habitat areas have been assigned a summary condition rating based on consideration of a variety of factors, including forage availability. Areas with insufficient wildlife forage have been rated as unsatisfactory, and objectives have been established that highlight the need for corrective action. The effectiveness of future management in meeting RMP objectives will be monitored, and adjustments in livestock grazing will be made where direct competition for forage between livestock and wildlife is preventing attainment of objectives. Considering present resource conditions, the identified levels for livestock allocations provide for maintenance or improvement of wildlife habitat, provide satisfactory watershed conditions, and provide satisfactory or better resource conditions for nonconsumptive uses.
10. Finally, the EIS lacks specific information about all wildlife other than grizzly bears. For the most part, it fails to describe specific conflicts between wildlife and livestock in particular areas, and instead presents aggregate estimated numbers of wildlife and acres of wildlife habitat. Nor does it describe specific critical habitat areas. Without such detailed information, the reader cannot assess whether the proposed action or the alternatives would adequately resolve existing resource problems. [Comment Index Number: 33]	10. The Draft RMP/EIS contains specific wildlife information for species other than the grizzly bear (see Tables 2-16, 3-9, 4-4, 4-10, 4-12, and 4,16 in the Draft RMP). Also see the response to Comment Number 5. The plan's treatment of wildlife habitat and conflicts with livestock grazing includes both general and specific guidance. The categorization of allotments and the prioritization of f allotments is based upon site-specific wildlife information. Appendix E gives allotment-specific wildlife information including problems and objectives. The RMP's analysis of wildlife habitat is organized in terms of acres and condition of species-specific seasonal habitats. This allowed a better comparative assessment of wildlife impacts and benefits between alternatives. Critical habitat was not dealt with because there is none designated for any species (see Glossary). With regard to threatened and endangered species, the plan considers essential habitat and many of the Alternative A recommendations are designed to protect such habitat. If the reference to critical habitat meant crucial habitat (see Glossary) for nonendangered species, crucial habitat was considered in the development of all alternatives (see also the response to Comment Number 7).

WILDLIFE AND FISH RESOURCES

COMMENT	RESPONSES
11. The people in the county cannot afford to protect people from grizzly bears. Also no state nor federal agency has the manpower to do this. So why promote the increase in the grizzly bear population. [Comment Index Number: 80]	11. As a federal land management agency, the BLM has a legal mandate, via the Endangered Species Act (1973, as amended), to conserve and to aid in the recovery of all listed species. The grizzly bear is listed as threatened.

RECREATION, VISUAL, AND CULTURAL RESOURCES

1. We note that historic properties do exist in Butte District, but the environmental statement does not demonstrate that the Bureau is aware of its responsibilities for the protection of such properties pursuant to Section 110 of the National Historic Preservation Act of 1966, as amended in 1980, nor does it identify a commitment to comply with Section 106 of that Act for those historic properties that would be affected by the actions taken to implement the management program. In-point-of-fact, the descriptions of Bureau historic properties management on pages 23 and 67 imply an independent management program which does not conform to the congressionally mandated program detailed in the National Historic Preservation Act and the Council's regulations. For these reasons we consider the treatment of historic properties in the environmental statement to be inadequate, and we suggest substantial revision of the final environmental statement to ensure that the management program established for the Headwaters Resource Area is in conformance with applicable Federal laws and regulations. In particular, we would like to point out that management decisions regarding historic properties should only be made after consultation with the Montana State Historic Preservation Officer and the Council (as appropriate) in accordance with the steps detailed in 36 CFR 800. [Comment Index Number: 1]	1. All laws and policies affecting historic and cultural resource manaegment, including the National Historic Preservation Act of 1966 and 36 CFR 800, are currently being complied with and will continue to be complied with in the Headwaters Resource Area. The land and resource allocations and management direction provided by the Headwaters RMP should be viewed as supplemental to existing laws, regulations, and policies. The use evaluation system discussed in the Draft RMP/EIS alternative is contained within the BLM Cultural Resources Manual (Draft) and is proposed for inclusion within the Final Uniform Regulations called for in the Archeological Resources Protection Act of 1979. We feel that it is in full conformance with the program mandated by Congress. In addition, individual actions that take place as a result of the RMP will still be analyzed on a site-specific basis through the BLM's environmental assessment process. Cultural resources will be further evaluated at this time and any necessary consultation with the Montana State Historic Preservation Officer and the Council, in accordance with existing federal laws and regulations.
2. The Headwaters Resource Area also contains a portion of the Flathead Wild and Scenic River, a component of the National Wild and Scenic River System. Impacts which would adversely affect this resource should also be avoided. [Comment Index Number: 8]	2. The Flathead Wild and Scenic River is not within the Headwaters Resource Area and, therefore, is not covered in the Headwaters RMP.
3. "I recommend that the final document specify your personnel needs under each of the alternatives and present your proposed programs for the survey of those portions of the study area which have not yet been surveyed for historic properties as well as your program for the timely evaluation and nomination to the National Register of Historic Places of identified historic properties. [Comment Index Number: 12]	3. Impacts on cultural resources between the various alternatives have suggested no significant long-term change in the program workload. The present table of organization includes two archeologists based at the Butte office who conduct cultural resource inventories for BLM-initiated actions, with work on special projects or non-BLM actions being accomplished by contracting archeologists. This procedure has led to an annual cultural resource inventory of more than 14,000 acres per year on the average. An existing Class 2 inventory of the Dillon and portions of the Headwaters Resource Area have indicated significant historical sites. Once completed a Class 2 inventory of prehistoric cultural resources will lead to a greater knowledge of such resources leading to a greater program efficiency in the identification, evaluation, and nomination of properties eligible to be placed on the National Register of Historic Places.

TABLE 7-3 (cont.)

RECREATIONAL, VISUAL, AND CULTURAL RESOURCES

COMMENT	RESPONSE
4. Recreation Resources: Again, the RMP/EIS contains an accurate general discussion of potential general impacts, but there is no attempt to apply the general knowledge to the "on-the-ground" situation in the Headwaters Resource Area in order to estimate the impact of each alternative on recreation "in detail." [Comment Index Number: 32]	4. Most of the Resource Area receives a very low level of dispersed recreational use and is not impacted to any great degree by any of the alternatives. The developed sites and most of the more popular dispersed sites also will not be significantly affected because they lie outside of the "issue areas" [Rocky Mountain Front, Great Falls Coal Field, etc.]. Examples of these are the Holter Lake Recreation Site, the major river corridors, and most of the riparian dispersed recreation use areas. Recreation impacts for significantly affected areas, such as the Scratchgravel Hills and Sleeping Giant, are discussed in the Draft RMP/EIS. Most recreation impacts are and will continue to be handled on a case-by-case basis when greater detail is available on site-specific impacts so that mitigation can be directly applied.
5. Visual Resources: The RMP/EIS contains no detailed analysis of visual resource impacts. The document merely states that if Class A is managed to retain visual quality "there should be minimal adverse impact" and that "some significant adverse impacts could occur" if suitable visual quality objectives are not applied on scenic quality Class B and C land (p. 115). Nowhere in the RMP/EIS are these objectives described. Adequate analysis of visual impacts, of course, is inhibited by the fact that none of the alternatives actually contains a visual resource management program; each merely proposed to continue evaluating visual resources "as part of activity and project planning" (p. 23). Although the levels and types of development that would occur under each alternative would presumably vary, the EIS unexplicably concludes that visual impacts would be the same under each alternative (pp. 115, 133, 141 and 149). [Comment Index Number: 32]	5. Visual resource management (VRM) was not identified as an issue to be addressed in this RMP. BLM staff and the public appear to be satisfied with current VRM practices in the Headwaters Resource Area that rely on case-by-case analysis and development of mitigating measures to protect scenic values. Current BLM policy requires that VRM inventories be conducted only when needed for issue resolution in RMP efforts or in those sensitive areas where a potentially high-impact project is proposed and no inventory exists. However, the Draft Headwaters RMP could have provided a more detailed explanation of current management direction for the VRM programs. This has been done in Chapter 2 of the final document. A correspondingly more detailed analysis of visual resource impacts has been provided in Chapter 4. It should be noted that, in general, there are no significant differences in impacts under the different alternatives except for those areas being considered for wilderness or other specific designations where VRM management classes are dependent on such designations.
6. The visual resource classification presented on page 67 of the DEIS is arbitrary and represents an unjustified value judgment. Plains areas cannot be said to be inherently lacking in scenic value. Where management decisions are based on arbitrary classifications such as this serious errors are likely to be made. [Comment Index Number: 30]	6. The visual resource management program is designed to assess the visual resources of an area in relationship to the rest of the general area. This does not mean that areas that do not receive a Class A rating are lacking in scenic value. It merely establishes a ranking of the relative values of one area as compared to others. It is not unusual to have specific scenic resources in areas that are not Class A. That is part of the reason that other factors in addition to scenic quality are incorporated into the VRM program. Visual sensitivity and distance zones also are important in developing management classes. In addition, areas that may be sensitive, such as those near travel corridors, normally receive special consideration in spite of a low scenery quality or management class.
7. Finally, visual resource management in Unit 5 and 26 should be sensitive to the location of the Continental Divide Trail and the recreational use thereof. [Comment Index Number: 19]	7. The Continental Divide Trail, as it exists on public lands in the Headwaters Resource Area, occurs primarily in areas that are already impacted by improved roads and other development. In addition, the trail does not receive heavy recreational use at this time. However, stipulations will be attached to any future development proposals for public lands along the route of the trail to assure compatibility of projects with management objectives for the Continental Divide Trail.

SOCIAL AND ECONOMIC CONSIDERATIONS

COMMENT	RESPONSE
1. All four alternatives include the economic costs-benefits associated with range use and oil and gas development as well as the approximate number of jobs created with the timber industry. We believe detailed cost-benefit analyses are required for other non-market resource uses as well as the ones named above. Detailed or quantitative economic analyses of recreational use (motorized as well as non-motorized, hunting/fishing use), wildlife forage allocation (as this relates to hunting activity, for instance) and wilderness preservation would provide a more complete, detailed basis for comparative analysis. Such analysis would provide a better range of alternatives and could change parts of the preferred alternative BLM selects. For example, the inclusion of such data and analysis did lead to a significant change in the Bureau's final proposed plan for the Glenwood Springs Resource Area in Colorado. There, it was discovered through the economic analysis of the wildlife and livestock forage allocation for the Economic Development and Resource Protection alternatives that increasing wildlife forage allocations would result in greater economic benefits, primarily through the impact increased hunting opportunities would have on the area's economy. This was unexpected to the BLM staff who prepared the draft RMP/EIS, and the final plan was adjusted to increase wildlife forage. [Comment Index Number: 32]	1. Available information lacks sufficient detail to do meaningful benefit-cost analysis for each resource. In the plan the oil and gas analysis was based upon a series of assumptions in order to give the reader some idea of the magnitude of impact if a moderately sized field were discovered. The only detailed economic analysis was done on grazing. This was possible because the level of detail needed to meet the provisions of the court settlement of the grazing suit was also sufficient to do a meaningful economic analysis. In accordance with the BLM's range improvement policy, a preliminary benefit-cost analysis was done for each I grazing allotment (see Appendix E). This involved an analysis of estimated project costs and benefits to range, wildlife, and recreation. In addition, as part of the criteria used to categorize allotments, economic values for wildlife and recreation were considered. As specific AMPs or other range improvement proposals are formulated, a more detailed benefit-cost analysis will be completed. Additional economic information is available for wildlife, recreation, and other resources in the Headwaters Management Situation Analysis.

WEED CONTROL

1. The BLM should commit to cooperative efforts with county weed boards, private landowners and state and federal agencies. [Comment Index Number: 13]	1. The Bureau of Land Management considers the control of noxious weeds on the public lands to be an important management function. Budget and personnel constraints are the major factors limiting the BLM from pursuing a more aggressive weed control program. The BLM will continue to work cooperatively with any interested party toward control of noxious weeds. Many infestations involve intermingled ownerships. Most projects that BLM is involved in are planned and accomplished on a multiuser basis. This approach has proven to be effective in controlling the infestations and popular with other cooperators.
2. Weeds and their control cost Montana producers $25-27 million annually. The loss to producers from weed competition, water and nutrient loss and shading is estimated at $2 million. This is after Montana producers have spent $23-25 million on control. Due to these facts, more attention should be given to the identification, mapping and control of noxious weeds in the BLM management plan. [Comment Index Number: 13]	2. Known infestations of both poisonous and noxious plants have been mapped and are included in present inventory data. Only a small percentage of the public lands in the resource area are infested by these plants. The BLM will continually update its information with reports from adjacent landowners and from its own specialists. BLM cooperative efforts for plant pest control would be the same under all alternatives considered in the RMP. As coordinated control plans are developed by county weed boards or other entities, the BLM is committed to participation to the extent of infestation of public lands and current availability of funds.

TABLE 7-3 (cont.)

FIRE MANAGEMENT

COMMENT	RESPONSE
1. The fire program is defined under "management guidance common to all alternatives," but little detail is provided concerning implementation. Given the scattered nature of BLM lands, the policy regarding cooperation with the Department of State Lands, and the USDA Forest Service should be explained. Also, the existence of the County Cooperative Fire Program should be acknowledged, and coordination with the participating counties explained. [Comment Index Number: 13]	1. The BLM is a signatory to and participates in three interagency cooperative agreements, including the Fire Control Cooperative Agreement between the BLM and the State of Montana and the Fire Management Agreement between the BLM and the Northern Region of the Forest Service. These agreements have been developed to better define working relationships and responsibilities among the cooperating agencies. They have not been included in the RMP because they do not affect the allocation of lands or resources within the Headwaters Resource Area. The BLM has no signed agreements with the counties in the Headwaters Resource Area; however, the BLM works through the Department of State Lands in coordinating fire programs with county governments. All cooperative agreements are available for review in the Butte District office.
2. No mention is made of the impacts associated with the prescribed burning of logging debris and sagebrush. The preferred alternative indicates that prescribed burning is planned on both forest and range lands, but no measures are given for mitigating smoke impacts. Reference should be made to the Montana Cooperative Smoke Management Agreement and Plan. [Comment Index Number: 13]	2. The Bureau of Land Management is a signatory and participates in the Montana Smoke Management Cooperative Agreement. Under this agreement the BLM works with the State Airshed Group to minimize air quality impacts from our prescribed burns. This is done by coordinating with other agencies and burning only when there is good smoke ventilation. A copy of the agreement and the air quality burning permit are available for review in the Butte District office.

GENERAL

1. Although the Headwaters Plan is well organized and easy to read, it is very general. Future allotment or project management plans should be specifically described. The effects of each proposed action and the monitoring methods to be used should be identified in the plan. [Comment Index Number: 13]	1. The Headwaters RMP is intended to establish general allocations and guidance for future management of public lands and resources. Allotment management plans and other detailed activity plans will be prepared subsequent to this RMP. Environmental analyses, land reports, records of decision, and other well-established BLM procedures will specifically describe these activities and their specific effects will be identified and analyzed. Monitoring methods to be used will be documented in a detailed monitoring plan to be completed in 1984.
2. Management issues numbered 6, 7, and 8 as they relate to the Scratchgravel Hills are addressed in the county's recently completed Scratchgravel Hills Comprehensive Management Plan. (A copy of this draft document has been sent to Mr. Lyle Fox in your office). [Comment Index Number: 14]	2. The proposed RMP responds to the issues in a manner consistent with, and complementary to, the draft Scratchgravel Hills Comprehensive Management Plan. Future management actions undertaken by the BLM will be subject to the various provisions of this RMP in the Scratchgravel Hills area.
3. While cattle grazing is an important use of the public lands, there are other uses equally important. Defenders of Wildlife feels that specific targets for these values should be established; the plan should try and provide habitat for x number of grizzly bears, for example, and x number of bighorn sheep. [Comment Index Number: 20]	3. The proposed RMP strives to balance competing demands for public lands and resources by treating essentially all uses as "equally important." Specific utilization targets have been established for livestock because the BLM can effectively regulate livestock numbers and seasons of use within defined grazing allotments. Similar targets, such as utilization or population levels, have not been established for wildlife because BLM actions within the resource area generally play a minor role in affecting wildlife population dynamics. However, the RMP does establish habitat objectives which, once accomplished, will provide for an overall improvement in wildlife habitat conditions. See also response to Comment No. 9 in Wildlife and Fish Resources section.

GENERAL

COMMENT	RESPONSE
4. The document contains little in the way of analysis of management practices or criteria. As a consequence, it would seem that a large percentage of the area's public lands would see no significant changes in management practices under any of the proposed alternatives. In our view, the document should be revised so that the proposed alternatives would address in more detail differences in general management practices under the various alternatives. [Comment Index Number: 25, 28]	4. The alternatives respond to the identified issues primarily through the allocation of lands and resources. The general management practices and criteria to be applied (within the framework of the land/resource allocations) would not vary between alternatives, and thus they are discussed under "Management Guidance Common to All Alternatives." The general management practices and criteria presented in the RMP are based on laws, regulations, State Director Guidance, and established BLM policies and procedures; they have already been subject to considerable public review and discussion, and have been applied successfully in the field. They are analyzed in this RMP within the context of the proposed land and resource allocations.
5. The document does not appear to explicitly address the processes and considerations for the designation and protection of unique or exemplary habitats or populations of plants or animals. This should be an important aspect of any planning process. Audubon members due to their interests in these matters are often aware of such habitats and populations and as a consequence are concerned with their recognition and protection. We feel that the plan should clearly identify processes and considerations, inclusive of public involvement, by which such recognition and protection may be achieved. [Comment Index Number: 25]	5. The Headwaters RMP addresses "special designations" as one of the eleven planning issues. The RMP provides for the recognition and protection of unique or exemplary habitats in three areas: The Rocky Mountain Front, where four Outstanding Natural Areas are proposed; the Sleeping Giant, which is proposed for designation as an Area of Critical Environmental Concern; and the Elkhorns, where special management guidance (including removal of commercial forest acreage from the allowable cut base) is proposed for the protection of important elk habitat. Other important wildlife habitats would be protected or, in many cases, improved through the implementation of allotment management plans or through the application of management guidance provided for specific programs such as oil and gas leasing stipulations. No other specific habitats or populations have been identified that appear to warrant further consideration for special designation.
6. If a resource involved in the planning rates special consideration and handling in a resource management plan, then it follows that extra effort must be made by BLM to assure that adequate and continuous direction is given this special resource. The proposed direction under Water on Page 19 of the DEIS is an illustration of this. The direction proposed is good until you reach the point where the phrase "to the extent possible" appears. This phrase effectively deletes the entire purpose and direction previously stated and allows the line manager to determine riparian utility location to proceed at his own whim, rather than under prescribed direction. This is a weakness that needs further attention in the FEIS. [Comment Index Number: 31, 56]	6. Qualifiers such as "to the extent possible" have been deleted from the proposed plan in several instances; however, many such qualifiers remain as originally drafted, including the phrase you refer to on page 19 of the Draft RMP/EIS. A general plan of this nature is not intended to provide absolute and specific guidance that anticipates every localized situation or contingency; instead, "rules of thumb" are established that provide general guidance yet allow for exceptions from the rule.
7. As we mentioned in our comments on the Billings Resource Area plan, the Federation is uneasy with the use of Soil Conservation Service Utilization Standards. SCS grazing rates and standards are aimed at maximum livestock production and usually are not compatible with a coordinated livestock-wildlife multple use management program. We urge that these standards not be used. [Comment Index Number: 31]	7. For most of the public lands grazed, current vegetative condition determinations were made through use of the Soil Conservation Services *Montana Grazing Guides*, a methodology well accepted by the scientific community for the purpose of determining vegetative condition based upon ecological site potential. Any livestock adjustments made will consider utilization data, actual use records, and other monitoring data in conjunction with production estimates based upon these range condition determinations.

TABLE 7-3 (cont.)

GENERAL

COMMENT	RESPONSE
8. In formulating the different alternatives analyzed and compared in the RMP/EIS, different goals and objectives were not developed for each resource in each alternative. (See Table 2-15, p. 47.) In many areas, there is little or no difference in the proposed management actions for each alternative, making the comparative evaluation of impacts in the document extremely limited. [Comment Index Number: 32]	8. Alternatives were developed based on the need to resolve identified issues; resources and programs not "at issue" will be managed in the future essentially as they are at present. Such nonissue resources and programs are discussed in the RMP/EIS under Management Guidance Common to All Alternatives, and impacts to them are analyzed in the Environmental Consequences chapter. Differences between alternatives are based largely on the nature of the issues and on the availability of reasonable options for resolving issues. The alternatives analyzed in the Headwaters RMP explore a reasonable range of issue resolution options, are commensurate with the nature of the issues, and are consistent with the alternative formulation criteria identified earlier in the planning process.
9. More inventory and data—especially on many "nonmarket" resources—is necessary in the RMP/EIS to allow comparison and integration of information concerning all the various land uses BLM is required to consider under FLPMA (see Sec. 103(c)). Eroded and erosion hazard areas, areas of heavy ORV use, localized sources of water pollution, unsatisfactory riparian habitat and different types of recreational use which are briefly mentioned in the Chapters on Affected Environment and Environmental Consequences should be identified on map overlays and quantified to the greatest extent possible. [Comment Index Number: 32]	9. The level of inventory—and data used in developing the Headwaters RMP/EIS including nonmarket resource information —is considered adequate for the purpose of establishing general resource area-wide guidance and resolving the indentified issues. The RMP/EIS displays and quantifies both market and nonmarket information to the extent needed to identify trade-offs allowing for an informed decision regarding selection of the preferred alternative. Additional information will be acquired through monitoring and, in some cases, thorugh additional inventories, and will be used in developing and analyzing site-specific management actions subsequent to RMP approval.
10. Where important information is unavailable because of present budget and time constraints it would also be helpful to the public and future BLM management to specifically identify these data gaps in the document. Indeed, BLM planning regulations require that RMPs generally state where there is a "need for an area to be covered by more detailed and specific plans." (43 CFR 1601.0-5(k)(8)) [Comment Index Number: 32]	10. The Headwaters RMP identifies the need for additional analyses and/or activity plans in order to fully implement such programs as range, forestry, oil and gas leasing, lands, travel planning, fire management, and road and trail construction. Virtually every resource and program discussed in the RMP may require additional data and analysis in the future in order to respond to BLM-initiated activity-level planning. Other actions proposed by non-BLM applicants, such as applications for road or utility rights-of-way, also are likely to require additional data and analyses.
11. As BLM's master land-use plan for the Headwaters area, the RMP/EIS should also contain thorough analysis and management actions for all resources—including water potentially impacted by hardrock mining in the Scratch Gravel Hills and coal mining in the Great Falls Coal Field — even though other state and federal agencies may share the responsibility for protecting these resources. The fact that other agencies share responsibility for protecting these resources does not lessen BLM's statutory and regulatory obligations to protect these resources and to propose concrete ways of doing so. [Comment Index Number: 32]	11. The analysis and management guidance contained in the RMP/EIS are considered adequate for resolution of the mineral exploration and development and coal leasing issues. However, as stated in the plan, additional analyses will be conducted and site-specific coal lease stipulations will be developed, prior to issuance of coal leases. In the case of the Scratchgravel Hills, the decision to allow public lands to remain open to mineral entry and development was based on the finding that a withdrawal of public lands in the area would not be effective in eliminating impacts. The BLM will continue to work within the limits of its statutory and regulatory authority to protect important resource values, including water quality, while permitting mining activity to continue in this area.

GENERAL

COMMENT	RESPONSE
12. The discussion of alternatives in the EIS is inadequate for other reasons. First, the "no action" alternative contains proposed range improvements and long term forage allocation adjustments (Table 2-5, p. 32; Table 4-9, p. 134), and thus does not really constitute a no action alternative, as required by NEPA. See 40 C.F.R. Sec. 1502.14(d) (1982). Second, the "protection" alternative is self-contradictory because it seeks to advance conflicting goals. If, as the EIS acknowleges, a single alternative cannot realistically "achieve wildlife, watershed, and vegetative" objectives simultaneously (p. 143), then the EIS should include alternatives or sub-alternatives that would advance these individual resource goals. Without such an analysis, the Bureau will never analyze what management actions are necessary to provide full protection for these resources, thereby precluding such actions before they have been considered. [Comment Index Number: 33]	12. The no action alternative in the Headwaters RMP/EIS portrays a continuation of present management direction, including present levels or systems of resource use. The proposed range improvements associated with this alternative are improvements that would be implemented if present management direction was continued. No short-term adjustments in livestock forage allocations are proposed under the no action alternative. However, as discussed in Chapter 4 (Environmental Consequences), the long-term forage allocation adjustments projected for the no action alternative reflect changes in forage availability that are expected if current management direction is continued. These adjustments are not an integral part of the no action alternative; they are, however, among the long-term environmental consequences that could be anticipated if the no action alternative were to be implemented. The protection alternative places primary emphasis on maintaining or improving important environmental values, including wildlife habitat and watershed conditions. The analysis contained in the draft RMP/EIS does not show these goals to be conflicting or self-contradictory. The analyses for this alternative does show, however, that when ecological site condition is used as a measurement standard, the projected long-term percentage of rangeland in poor condition would increase slightly, reflecting the fact that on some sites, vegetative condition at a seral stage less than climax optimizes wildlife habitat condition. At the same time, adequate soil and watershed protection would be provided. Thus, any apparent contradiction of data is due only to the measurement standard used.
13. The EIS also fails to substantiate the environmental impacts predicted, as required by NEPA. It lacks any analysis of the predicted impacts of implementing particular proposals, such as grazing reductions or modifications, in particular allotments. It also lacks any general discussion of why certain kinds of actions might have certain types of effects under various resource conditions. Thus, the EIS totally fails to comply with NEPA's requirement that EISs must demonstrate that the agency has conducted the environmental analyses necessary to substantiate predicted conclusions. See, e.g., 40 C.F.R. Sec. 1502.1, 1502.24 (1982); Department of the Interior, Departmental Manual on NEPA, Sec. 4.14 (45 Fed. Reg. 27546 (April 23, 1980). [Comment Index Number: 33]	13. The environmental analysis contained in Headwaters RMP/EIS is considered adequate to support the general land and resource allocations and management guidance provided in the plan alternatives. The RMP/EIS is not intended to be "the final word" in terms of site-specific proposals and analyses. It is, however, intended to establish a framework within which future site-specific management actions and analyses will be conducted. See also responses to Comments No. 1 and 9 in this section.
14. The EIS lacks any cumulative analysis of the consequences on range, wildlife, and other resources of implementing the diverse aspects of the proposed plan, such as oil and gas leasing, land disposal, and livestock grazing. The EIS only analyzes the impacts of particular types of activities on various resources, without considering cumulative and synergistic affects. Nor does it analyze the extent to which certain activities, such as leasing and land disposal, may preclude the agency from implementing other activities, such as wildlife or livestock use. In short, the environmental analysis is too fragmented to be very useful in formulating a coherent, comprehensive land use plan. [Comment Index Number: 33]	14. Cumulative impacts are discussed for each resource by alternative in Chapter 4, Environmental Consequences, and are summarized in Table 2-16. The significant impacts expected from leasing and land disposal also are identified by resource in Chapter 4; where no significant impacts are identified, none are anticipated.

GENERAL

COMMENT	RESPONSE
15. Although the EIS recognizes that the main impact from many types of development is the construction and use of roads (p. 109), no attempt is made to quantify or estimate the total amount of roads needed under each alternative. An estimate for timbering roads needed is given under the section on forestry, but this is the same under all alternatives and is presumably not the result of comprehensive transportation planning and analysis. The total miles of roads necessary for access, the ecological and visual impacts of these roads and the cost of building the transportation system can often be greatly reduced by long-term, comprehensive transportation planning. Major factors in transportation planning should include projected use, the visual and ecological sensitivity of various alternative transportation corridors, and the various land-use restrictions which can be used by land managers. [Comment Index Number: 32]	15. The forest management program is the only BLM program expected to require a significant amount of road construction during the life of the Headwaters RMP. Such roads will be subject to a more comprehensive transportation planning and analysis process at the time specific timber sale areas are delineated. This process includes an analysis of resource management needs, user safety, impacts to environmental values, and construction and maintenance costs. Such analyses are conducted within the context of compartment management plans and/or environmental analyses and these also include consideration of alternatives and mitigating measures.