



# **U.S. Department of the Interior**

Bureau of Land Management

Dillon Field Office

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Dillon, Montana 59725

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## **Scoping Summary Report**

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for the Dillon Resource Management Plan

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## **BACKGROUND**

The Bureau of Land Management's Dillon Field Office (DFO) is located in Dillon, Montana and administers 902,528 acres of public land and 1,306,504 acres of subsurface mineral estate in Beaverhead and Madison Counties in the southwestern corner of the state. These lands are presently covered by a Management Framework Plan (MFP) approved in September of 1979. The new Resource Management Plan (RMP) will establish public land uses and constraints within the DFO in order to attain desired resource condition goals and objectives, as well as provide a framework to guide subsequent management decisions. The plan will be comprehensive in nature and will address issues and management concerns identified through internal, interagency and public scoping processes.

Scoping is one of the first steps in the planning process, as well as a requirement of the National Environmental Policy Act (NEPA). It is the process of gathering initial planning information from a wide variety of sources and collecting thoughts and concerns about the project at hand. Scoping helps define the values people have for resources, issues and concerns, potential management approaches, and effects people want to see addressed. The scoping process is not designed to be a voting process. It is a way to make sure all the issues have been analyzed, helps to identify potential alternatives and helps to understand the rationale behind comments and concerns.

This Scoping Summary Report includes comments received through February 19, 2002. Additional comments received in relation to the RMP will be logged in the official record but this report will not be modified to include that information.

While this report does not attempt to assess the value of the comments, specialists on the planning team have been assigned to consider the comments in the categories pertinent to their expertise as they work on the RMP. Many comments have already been used to refine issues and modify and clarify planning criteria. Other comments will be used to assist with alternative development and impact analysis. Some comments request changes in processes or other planning considerations that may or may not be possible given planning requirements, time frames and budgets. Other comments suggest information that might be useful as the plan is developed. Still other comments relate to broad planning theories or ideological themes that are not items resolved by a Resource Management Plan.

This report does identify the changes that have been made to the Planning Issues and Planning Criteria as a result of public input. The modified Planning Issues and Planning Criteria are included below.

## SCOPING AND COMMENT REVIEW PROCESS

Formal scoping started with publication of the Notice of Intent in the Federal Register on August 9, 2001. Press releases and mailed brochures announced the beginning of the scoping process and the location of information open houses. Comments were requested by October 19, 2001. Five open houses attended by approximately 50 people were held in Lima, Dillon, Butte, Ennis, and Sheridan. Comment forms were available at the open houses and were also mailed to approximately 1000 people.

Seven issue categories were identified prior to scoping and were presented in the formal scoping information. These included:

- ✓vegetation management (riparian areas, fire reduction/management, noxious weeds),
- ✓watershed management,
- ✓special management area designations (Areas of Critical Environmental Concern (ACECs), Wild and Scenic Rivers (WSR), Wilderness Considerations),
- ✓Special Status Species (threatened, endangered and sensitive species),
- ✓travel management and access,
- ✓commercial uses (livestock grazing, mineral leasing, exploration and development, timber harvest, etc), and
- ✓land ownership adjustments.

Over two-hundred written responses were received on comment forms, letters and e-mails from individuals, organizations, businesses, government, etc. Over one hundred of the written responses provided comments in addition to indicating a desire to remain on the mailing list. Of the letters that included comments, over half were from individuals and nearly 20% were from organizations such as American Wildlands, The Public Lands Advocacy, Montana Farm Bureau Federation, National Wildlife Federation. The remaining letters were from a variety of sources such as businesses, federal, state, Tribal and local governments, and elected representatives.

All scoping comments were logged, read by BLM employees, coded by broad subject area and entered into a WordPerfect table document. The comments were then sorted by subject area and disseminated to the planning team for consideration. Copies of the actual letters were also made available to specialists for more detailed information.

It should be noted that some comments consist of only a few words while others are several pages long, with comments embedded into a lengthy narrative. Due to the length of the EPA letter (letter 155) and the regulatory nature of the comments, these comments are not included in the summary except for brief identification. Since the purpose of this summary is to reflect the types and breadth of comments received rather than to count comments, unique comments are listed only once even if the comment was received many times.

## CHANGES TO THE PLANNING ISSUES

A **planning issue** is defined as a matter of controversy, dispute or general concern over resource management activities, the environment, or land uses. While planning issues become “drivers” of the plan, many other basic environmental and management issues are also addressed to provide comprehensive management guidance for all resources and to satisfy legal requirements.

Scoping comments, combined with additional information from the planning team, resulted in adjustment and restatement of the seven issue categories listed above. The following adjustments were made:

- ✓ The preliminary issue category of Vegetation Management was split into three separate focused questions relating to upland and riparian vegetation, forests and woodlands, and noxious weeds.
- ✓ The preliminary issue category of Watershed Management was merged into the questions relating to upland and riparian vegetation. Water quality concerns will be addressed in the plan but are interrelated with healthy riparian, rangeland and forest habitats, and are not stated separately.
- ✓ The preliminary category of Management/Designation of “Special” Areas was split into statements about Areas of Critical Environmental Concern (ACECs) and Wild and Scenic Rivers, respectively.
- ✓ The preliminary issue category of Land Tenure Adjustment, or changes in ownership of public lands, was dropped as a major planning issue since alternatives and decisions about the adjustment of public lands, either through disposal or acquisition, will be driven by other program concerns.

These adjustments have resulted in the identification of eight (8) planning issues, as stated below:

### ISSUE #1

How will riparian and upland vegetation be managed to achieve healthy rangelands and provide for livestock grazing and fish and wildlife habitat?

### ISSUE #2

How will forest and woodland resources be managed for forest health and to reduce dangerous fuel loads, as well as to provide wildlife habitat and commercial wood products?

### ISSUE #3

How will noxious weeds and other invasive species be controlled in the planning area and what conditions will apply to permitted activities?

#### **ISSUE #4**

How will conservation and recovery strategies and guidelines for threatened and endangered and other species be applied in the planning area and how will that impact recreational and commercial uses?

#### **ISSUE #5**

What level of commercial or other authorized use should be allowed in the planning area, and what conditions will be applied to permitted activities?

#### **ISSUE #6**

Should any areas be designated Areas of Critical Environmental Concern and what kind of management is needed to protect the values they contain?

#### **ISSUE #7**

Should any rivers be recommended for inclusion in the National Wild and Scenic Rivers system?

#### **ISSUE #8**

How should travel be managed to provide access for recreation, commercial uses, and general enjoyment of the public lands while protecting natural and cultural resources?

***It is important to remember that many areas of concern are not identified in the issues above. A number of other issues and management concerns identified in public scoping and by the planning team will be addressed by the plan and considered in the effects analysis, but these concerns will not have overriding influence on the development of alternatives.***

Keep in mind that as we proceed, there may be additional adjustments as we continue to review information and have interdisciplinary discussions.

## **CHANGES TO THE PLANNING CRITERIA**

Preliminary planning criteria identified at scoping have been modified as well. Planning Criteria guide the plan, avoid unnecessary data collection and analysis and identify the legal, policy and regulatory constraints that direct or limit BLM's ability to resolve issues. As a result of Scoping Comments and additional review by the planning team, the Planning Criteria were refined. Changes in the criteria have been made as follows:

- ✓ a statement was added regarding BLM's multiple use mandate
- ✓ a statement was added regarding use of available inventories
- ✓ the criteria regarding existing Wilderness Study Area recommendations and additional inventory requirements was separated and clarified

- ✓ a statement was added on using information from previously completed landscape analyses
- ✓ a statement was added recognizing State of Montana's authority over water rights and water law
- ✓ a statement regarding consideration of Tribal concerns was added

The full list of planning criteria is included below.

### **PLANNING CRITERIA**

- The principles of multiple use and sustained yield as set forth in the Federal Land Policy and Management Act will be applied in the RMP.
- The RMP will comply with applicable federal and state laws and regulations.
- The RMP will be accompanied by an Environmental Impact Statement (EIS) that will comply with National Environmental Policy Act (NEPA) standards.
- RMP decisions will apply to lands in Beaverhead and Madison County under jurisdiction of the Dillon Field Office. This includes split estate, where the surface is owned or managed by another entity other than the Forest Service, but subsurface minerals are Federal. This does not include public lands in Beaverhead County that lie south of the Big Hole River between Wisdom and Divide. These lands are under jurisdiction of the Butte Field Office.
- The RMP will primarily rely on available inventories of public lands and their resources.
- Boundaries and recommendations on Wilderness Study Areas (WSAs) identified as a result of inventory conducted under Section 603 of FLPMA and awaiting action by Congress will not be changed by the RMP.
- Additional inventory for wilderness characteristics will be completed for public lands that have not been reviewed, or where new information is provided that shows additional inventory is necessary.
- Information from the landscape analyses conducted for the Gravelly and Pioneer Mountains will be used in development of the RMP.
- The RMP will incorporate the Standards for Rangeland Health and Guidelines for Livestock Grazing as set out by the Resource Advisory Council (RAC).
- The RMP will incorporate the Montana/Dakotas Statewide Fire Management Plan and associated Dillon Fire Management Plan update.

- The RMP will adopt the provisions of The Montana Weed Management Plan approved in January 2001.
- The RMP will incorporate decisions approved in January 2001 regarding travel management in the southern portion of the Centennial Valley.
- The RMP will consider the existing recovery plans and management strategies and guidelines in place for federally listed threatened and endangered species which utilize the planning area, including whooping crane, bald eagle, grizzly bear, wolf, and lynx. State management plans will be considered for delisted species. The RMP will incorporate by reference decisions resulting from the Statewide Programmatic Lynx Amendment/Environmental Assessment.
- The RMP will consider conservation and management strategies developed for protection, conservation, and restoration of westslope cutthroat trout, fluvial arctic grayling and sage grouse.
- The RMP will recognize the State of Montana's responsibility to manage fish and wildlife populations, including hunting and fishing uses.
- The RMP will recognize the State of Montana's authority regarding Montana water law and water rights.
- RMP decisions will be compatible to the extent possible with the plans and mandates of other agencies and governments that share jurisdiction in the region.
- The RMP will recognize federal land management agency obligations under applicable tribal treaties and laws or executive orders relating to Native American reserved rights, religious freedoms, and traditional use areas.
- The RMP will consider and integrate local, Statewide and national interests.
- Actions proposed by the RMP must be achievable given technological, budget and staffing limits.

## **COMMENTS BY SUBJECT AREA**

Below are the comments extracted from letters, emails and scoping mailers received as of February 19, 2002. Comments are provided in the following order:

*PLANNING/NEPA* (starts on page 7)

*SPECIAL AREA DESIGNATIONS* (starts on page 11)

*WILDLIFE* (starts on page 16)

*SPECIAL STATUS SPECIES* (starts on page 27)

*AVAILABILITY & MANAGEMENT OF PUBLIC LANDS FOR COMMERCIAL USES*

(starts on page 29)

*VEGETATION* (starts on page 35)

*WATERSHED MANAGEMENT* (starts on page 39)

*TRAVEL MANAGEMENT/RECREATION* (starts on page 42)

*SOCIAL HISTORICAL AND CULTURAL COMMENTS* (starts on page 46)

*FIRE* (starts on page 47)

*LAND TENURE ADJUSTMENT* (starts on page 49)

*ECONOMICS* (starts on page 51)

*ECOSYSTEM MANAGEMENT (EM)/ BIODIVERSITY* (starts on page 52)

*MULTIPLE USE* (starts on page 54)

*SOILS* (starts on page 55)

*AIR QUALITY* (starts on page 55)

*MISCELLANEOUS COMMENTS* (starts on page 55)

## ***PLANNING/NEPA***

Planning/NEPA comments are organized by the following subcategories: general comments, planning criteria, public involvement, alternatives/alternative development, impacts/environmental consequences, mitigation and monitoring.

**General comments** included:

- ✓ Consider providing information sheets for each main issue that identifies the parties, financial interests, regulations and wildlife that are affected by each issue,
- ✓ Would be helpful to have acronyms, what is similar on other BLM districts, numbers such as AUMs, PILT dollars, miles of roads and trails, miles of TMDL impaired streams,
- ✓ BLM needs to better define the issues that were listed at the open house (such as vegetation), maybe just use some subheadings,
- ✓ One requirement of effecting planning is that past plans be reviewed and the information learned from implementation and monitoring be used to improve the creation, implementation, management and monitoring of the new plan. Beaverhead County believes an important point of the scoping process should involve the following—a review of the 1979 MFP and the general guidelines, if provided; a review of the decisions and projects implemented in accordance with the 1970 MFP and a review of the monitoring completed to evaluate the projects for success or failure relative to the 1979 plan; a review and summary of what components of the 1979 MFP were successful and of equal importance, a review and summary of what was not successful; a review of the DFO in implementing the 1979 MFP. This process should allow the BLM/DFO to incorporate the lessons from the 1979 MFP into the 2001 RMP,
- ✓ Should there be equity in the presentation of issues? Why is there is no solicitation for the discussion on areas suitable for mineral development, forest health, public access, etc.,
- ✓ Please base your decisions on scientific criteria and not on the number of responses--pro or con,

- ✓There should be coordination with the Beaverhead/Deerlodge NF planning effort,
- ✓BLM must reach out to other resource agencies within the state and federal government in coordinating the review of these lands,
- ✓What is the definition of “best available scientific information” and how is that achieved?
- ✓How can the BLM/DFO follow the scientific process carefully and facilitate review of the decisions by the general public and skeptical scientists?
- ✓What is the appropriate role of science in the creation, implementation and monitoring of the BLM/DFO decision making process?,
- ✓It is a shame the DFO has no soil, water and air personnel on staff as required under FLPMA and a NEPA interdisciplinary approach to planning. So far these resources have been disregarded from the planning process,
- ✓How will the BLM determine the extent of RMP implementation and its effectiveness in resolving identified issues? To address this matter, the BLM should consider–accuracy and currency of data; construction of hypotheses related to implementation and effectiveness of aspects of the RMP; design of monitoring protocols to provide information relative to testing these hypotheses; and adaptive management protocols in response to monitoring and hypothesis test results,
- ✓What are the commonalities between Free Market Environmentalism, New Environmentalism, the evolution of Traditional Environmentalism to a community based collaborative effort and the new BLM planning guidelines?
- ✓How has the shift from a technical to a functional resource definition changed management paradigms?
- ✓EPA list of what that agency expects of the document, and what existing conditions need to be evaluated and described (letter 155).

Comments on **planning criteria** include:

- ✓Emphasize baseline issues that are at the core of the land health, species habitat and trends, water quality,
- ✓Data driven policy and “solution” criteria most important,
- ✓Use verified data, how can statistics be used to determine past trends and forecast future trends?,
- ✓Is analyzing how the system as a “whole” captures and processes energy a better indicator of resource health?
- ✓Provide an “equal footing’ approach to weighing public comment and participation—we citizens perceive the agencies as being too heavily influenced by representatives of special interest groups and unresponsive to citizens at large (i.e. the silent majority),
- ✓Sound respected scientific methods should be used as a base for all decisions,
- ✓BLM personnel need to avoid bias toward special interest groups,
- ✓Schedule important BLM planning meeting to be open to the public and advertise the schedule with ample notice,
- ✓How can statistics best be used as a management tool?
- ✓Is managing for the “whole” a more balanced approach than managing for one criterion?
- ✓How does statistical theory guide the scientific process and data collection?

- ✓How can a vigorous statistical methodology be used to verify the validity of a scientific process and/or the data collected?
- ✓The RMP should develop and incorporate clear and understandable standards to protect highly values in-place resources such as water quality, fisheries, old growth, roadless areas, and wildlife habitat,
- ✓Provide a weekly or monthly public notice of all salient points and topics discussed within the BLM RMP meetings. Make this notice a legal record of issues that have been formally addressed. Include a list of attendees of all meetings as a legal record of who has been participating in the BLM DFO process,
- ✓Coordinate with USFS Beaverhead-Deerlodge Forest planning effort,
- ✓You have many legal sideboards that you must follow. Be sure to get good documentation—some will claim you had no public input,
- ✓One of the steps should be that BLM, FS and SL remain and be a good neighbor—responding to problems, fencing and projects quickly.

Comments on **public involvement** include:

- ✓What relationship should the BLM/DFO have with the press and advocacy groups?
- ✓Beaverhead County would recommend that the RAC be given the additional responsibility of reviewing the ongoing implementation and monitoring to evaluate projects for success or failure relative to 2001 RMP,
- ✓How will the BLM/DFO meet the challenge of the “New Environmentalism” and its drive to a smaller, community and solutions based on process,
- ✓The meetings scheduled throughout the affected area should be plenty—they are open to the public and if the public in Missoula or New York can spend a lot of time here recreating, they should also find the time to come here for a meeting,
- ✓How does the environmental movement’s shift to a homegrown style of environmentalism correspond with the BLM’s collaborative community based planning guidelines?
- ✓It is frustrating to listen to and read comments that are not informed, blatantly self serving and untrue—everyone is not entitled to an opinion if it is not an informed opinion,
- ✓The format of the MT Consensus Council Memorandum on Public Participation for the RMP Process dated September 18, 2001 sets a framework for bias in this planning process. You need to provide a public forum where all ideas are welcome and where the public is presented with a balanced and objective body of information from which to make their own decisions,
- ✓I have concerns about your choices of scoping meeting locations. It seems biased toward resource users such as livestock grazers. Whitehall would have been a good compromise,
- ✓I was not able to access your website—the reliability of this technology is questionable,
- ✓Without the comments of all of the stakeholders of this field office being sought on equal footing, the validity of the conclusions coming out of this process area suspect,
- ✓All committee, staff and other meetings pertaining to this process must be open to the public—comments from US citizens and local committees, including politicians, should be accepted as advisory only,

- ✓The process for the determination of the scoping meetings was flawed—meetings should have been held in Bozeman, Missoula and very possibly other more populated areas---the BLM officials have admitted they do not truly know who their “customer base” is, yet assumed by holding meetings in a very limited areas they were speaking to the majority of the stakeholders—they were not ,
- ✓Are education and public relations part of the BLM/DFO’s responsibilities?

Comments on **alternatives/alternative development** include:

- ✓Consider an alternative that protects 25% of the DRA from livestock grazing; this will benefit species not tolerant of domestic sheep and cattle,
- ✓A reasonable range of alternatives should be developed for the RMP,
- ✓Would like to see the development of a Resource Restoration Emphasis alternative with the emphasis on actively managing to restore rangeland habitats, wetlands, and riparian and aquatic areas. As with other alternatives, the needs for commodity productions and public goods and services would be met within the capabilities and limits for healthy ecosystems—a restoration plan should include the following components (a) motorized routes (b) restoration of fire (c) stream restoration (d) exotic weeds,
- ✓The alternative plans and especially the chosen plan must “best” meet the present and future needs of the American people. The plan cannot adequately meet these needs, or generally meet these needs, or largely meet these needs, it must “best” meet them. FLPMA explicitly requires that what is “best” must be viewed from the perspective of the present and the future. What is best now may not meet future needs, and since future needs may in fact be unknown in many respects, the only way to “best” insure that future needs are met is to develop-and select-alternatives that have a large built in margin of safety. To achieve a large built in margin of safety, the plan should emphasize resource and ecosystem protection, which will best ensure that future needs are met. Furthermore, what is “best” must be determined with reference to the needs of the American people as a whole, not a subset of the American people,
- ✓It is also important to emphasize that under FLPMA the alternatives that are developed must consider the relative value of the resources involved. By this legally required measure, rare, unique, and sensitive native species, such as those on the attached list, have a value far in excess of more common or easily replaced public land resources. Accordingly, the alternative plans that are developed, and particularly the preferred alternative (plan), must give special emphasis to protecting these relatively rare resources,
- ✓Information from the EPA on range of alternatives (letter 155).

Comments on **impacts/environmental consequences**:

- ✓EPA comments on environmental consequences and cumulative effects (letter 155),
- ✓NEPA and CEQ regulations require full disclosure of past and present activities, and full disclosure of cumulative impacts including the direct and indirect effects. The proposed RMP will need to disclose the cumulative impacts of those past activities on the ecosystems and resources that are found within the study area,
- ✓Concern about little to no consideration of the effect of FS management on BLM

actions. Example: Mussingbrod timber sale has snags left in cutting area when there are thousands of snags on adjoining FS lands,

✓Look at the effects of RMP actions on adjacent private lands---for example, what are the effects on the potential for wildlife if fine fuels area not grazed or woody fuels are not harvested?

✓Two practical methods for depicting the environmental condition include use of the no action alternative and an environmental reference point such as the natural ecosystem as a benchmark in assessing environmental impacts with each alternative (letter 155).

Comments on **mitigation** include:

✓EPA comments (letter 155),

Comments on **monitoring** include:

✓Questions that should be asked and answered before going forward with monitoring are:

Does the agency have monitoring to:

–show the management strategy will result in the desired outcome?

-show the resource in the stated present condition?

-follow up on management decisions?

-insure progress to the desired outcome?

If the answer to any of the above questions is no, the monitoring will not be objective or scientific.

✓EPA comments on monitoring (letter 155)

## ***SPECIAL AREA DESIGNATIONS***

Special area designations comments include: general, general comments on ACECs, specific areas mentioned for ACEC designation, general comments on Wild and Scenic River designation, specific rivers mentioned for Wild and Scenic River designation, general comments on Wilderness/ WSA designation/Roadless Areas, and specific areas for wilderness study.

**General comments** include:

✓How will the designation of additional special areas affect the resource values and management of the existing specially designated areas?

✓Is designating an area as special the best way to protect the values in that area, or will the designation attract more attention and make protection more difficult?

✓How do special designations impair the ability of the BLM/DFO to effectively manage the designated area?

✓How will the BLM/DFO manage specially designated areas to protect the multiple use values inside and outside the specially designated areas?

✓Are there other management paradigms or designations that would be more

appropriate for lands that have a history of multiple use, including logging, mining, road building, motorized recreation and /or grazing than wilderness, ACEC, etc.?

✓We would ask the RMP project manager to individually , personally and immediately notify all grazing permittees which may be affected by a nomination of any designation such as ACECs, WSAs, Wild & Scenic Rivers,

✓What mechanism will the BLM/DFO implement in specially designated areas to protect prior existing water rights and support Montana water law?

**General comments on Areas of Critical Environmental Concern (ACECs) include:**

✓What does ACEC mean—spell out your abbreviations,

✓Rather than making specific nominations at this time, and after some discussion, I think that it would be more appropriate to consider ACEC as an alternative to other actions that are proposed by the BLM. For example, ACEC designation for areas that are proposed as wilderness, wild and scenic rivers, or other area requiring special management, may provide a mechanism whereby fewer regulations can accomplish certain goals or objectives that are determined to be desirable by the BLM. . . . .In addition, certain intensive use sites, by they mining areas, reclamation areas, motor cross areas, or other types of intensive uses my well require ACEC designation as a mechanism to provide specialized management designation. . . . .For the time being, we would request that mention be made in the alternatives that allows consideration of ACEC designation rather than more restrictive designation to allow appropriate management of sites warranting specific management,

✓The principles of island biogeography should guide BLM in creating protected areas. There the obvious application is in the creation of ACECs. Modern conservation biology has firmly established that larger protected areas are of greater value, and are more effective, that smaller areas for protecting biological diversity. Consequently, when BLM designates ACECs to protect wildlife, it should err on the side of creating larger rather than smaller preserves to better ensure the objectives of the ACEC are achieved.

✓Common sense is important here, use caution,

✓ACEC issues are better addressed locally by citizens that historically have protected them and are economically impacted by possible future changes,

✓Remember that ACEC is only an alert that sensitive resources exist and is not a means to stop an action,

✓We have plenty national parks and monuments—need to use caution and common sense especially if the resource can be protected within the permitting process,

✓ACECs should be emphasized, planned for and protected from cattle grazing---no further sagebrush burning or spraying,

✓ACECs: emphasis away from banning OHV use & determine what OHV funding, etc. can do to rehab if needed & provide ecologically sound routes in order to maintain as many recreational opportunities as possible,

✓We have enough already,

✓Consider all identified ACECs for protection (including all of those recommended in the 1979 MFP),

- ✓ Many of the existing ACECs have AMPs that have addressed and managed the areas quite well with the exception of forest health management. Leave Sage Creek project alone,
- ✓ Need a comprehensive inventory of flora, fauna, archeology, geological wonders, historic sites,
- ✓ When the importance criteria is applied to the wildlife resource, I find it difficult to use wildlife as a reason for an ACEC. . . . ACEC designation is an outdated concept—the designation does not do any good whatsoever,
- ✓ Proposal should include new issues and challenges, “new” resource issues and recommendations,
- ✓ Support designation of the 13 areas identified in the 1979 MFP and recommend expanding the boundaries based on the needs of wildlife,
- ✓ The scoping form says ACECS were never evaluated—this is not true and shows bias toward designation,
- ✓ Livestock grazing should be considered at least one of the major changes that is needed under ACEC designation to protect and conserve wildlife values. The suitability of livestock use within these important wildlife habitats must be critically evaluated, ungrazed ecological reserved should be established and the objectives for management of these areas should change to focus on the recovery and protection of umbrella or keystone species habitat. . . . .,
- ✓ Given the priority that Congress attached to designating ACECs, and its commandment that all agencies carry out programs to conserve listed species, it is apparent ACEC designation is precisely the kind of program the ESA intended to be used to further the conservation of listed species.

**Specific areas mentioned for ACEC designation include:**

- ✓ Historic Virginia City and its surrounding areas (historical and archeological values),
- ✓ Axolotl Lakes area,
- ✓ Madison Valley River Corridor,
- ✓ Upper Centennial Basin,
- ✓ Standard Creek,
- ✓ Heavy use recreation areas,
- ✓ Bannack State Park,
- ✓ Lemhi Pass (Lewis & Clark)
- ✓ Planning process should consider ACEC nomination of hazardous waste sites found on public lands—these were not addressed before because the federal regulations had not yet been developed—examples include Glen Tungsten Millsite, Ermont Millsite, Thorium City site, Pony town dump,
- ✓ All municipal watershed should be considered as they have immediate and important effects to humans—sites include city of Lima municipal watershed, cit of Butte Big Hole River diversion,
- ✓ Whole RA should be an ACEC (for wildlife protection, it meets the relevance and importance criteria—with 95% of this area being grazed by domestic livestock, many key wildlife species are being put in peril) ,

- ✓Upper Horse Prairie country–N & S forks of Everson Creek (surrounding the Peter’s FWP conservation easement),
- ✓Expand the Big Sheep/Creek Muddy Creek ACEC to include all public land within the Big Sheep Creek watershed and the Hidden Pasture Wilderness Study Area based on wildlife specifically sage grouse,
- ✓Expand Badger Gulch-Reservoir Creek ACEC to account for the needs of sage grouse,
- ✓We would like the BLM to give priority, as required by NEPA, to designating and protecting all 16 of the ACECs already nominated. Several of these ACECs have been nominated for the valuable habitat they provide for sage grouse. We would like to nominate additional areas for sage grouse conservation, specifically all lands within 18 km of all presently active and historic sage grouse leks on BLM lands. Within these areas we propose that the RMP consider implementing *Guidelines to manage sage grouse populations and their habitats* (Connelly et al 2000) . . . . ,
- ✓Medicine Lodge divide meteorite impact site (scientific site),
- ✓All BLM lands in the East Pioneers, sough through Argenta Flats, Badger Ridge, Henneberry Ridge, Badger Gulch and Bachelor Mountain,
- ✓Centennial Valley areas is the only area in which enough recent information exists for the public to make an ACEC recommendation–BLM has currently identified three different areas within the Centennial Valley for ACEC consideration. This proposal should be expanded to include all BLM lands within the Centennial Valley,
- ✓All wildlife corridors as described b the American Wildlands and Greater Yellowstone Coalition should be included as ACECs ,
- ✓Centennial Sandhills based on the wildlife resource and natural system criteria,
- ✓Waters on the state 303 (d) list,
- ✓Defenders specifically requests that all riparian areas in the Dillon Field Office be designated ACECs. The biological value of these areas is widely acknowledged. It is also widely recognized that most riparian areas in the west are in non-functioning or functioning at risk status. Riparian areas are discrete and easily recognized, generally speaking. . . In addition to riparian areas, other areas that should be considered for ACEC designation are: big game wintering areas, migration and other ecological corridors, and areas with special breeding, feeding or sheltering value for wildlife, such as cliff areas used by raptors, prairie dog colonies, and caves. Areas of large, contiguous habitat, should also be considered for ACEC designation.
- ✓High quality wetlands identified by MNHP that are located on BLM land may be worthy candidates for protection for a designation such as ACEC.

**General Comments on Wild and Scenic River designation** include:

- ✓No streams in the planning area should be reviewed under the Wild and Scenic River Act--better addressed locally,
- ✓Every time you designate something to be preserved, it gets much more use. Just make more areas that people can use,
- ✓Concern about the private land along these rivers, negative effects,
- ✓don’t get carried away–navigability has not been determined–how can BLM recommend designation if it does not control the waterway?

- ✓We have enough already,
- ✓We have too many already,
- ✓Such designation would not impair the production of livestock or wildlife habitat or the ability of the watershed to function,
- ✓Leave the river alone, do not help the commercial development of these rivers,
- ✓Move slowly, this can mean restrictions on our freedom of movement,
- ✓We don't think any rivers in this area meet eligibility criteria,
- ✓This process should recognize exiting rivers under this designation but not recommend more rivers for designation,
- ✓None,
- ✓Protection,
- ✓Against any Wild & Scenic River designation in Beaverhead County,
- ✓Need to work with local watershed groups and agencies to get grass-roots support. W&S designations would likely alienate those who area already good stewards—a solution arrived at by primarily local interests would be a greater benefit,
- ✓Private lands and the long time stewards are the #1 issue here—they're the ones that kept it looking good up till now.

**Specific rivers** mentioned for **Wild and Scenic River designation** include:

- ✓Lower Big Sheep,
- ✓Beaverhead,
- ✓Big Hole,
- ✓Big Sheep Creek.

**General Comments** on **Wilderness/WSA designation/Roadless Areas** include:

- ✓Vehicle management is important here,
- ✓Wilderness values are important—the ACEC list may contain future wilderness areas,
- ✓All roadless areas over 5,000 acres should be considered for addition to the National Wilderness Preservation System,
- ✓Consider management of WSAs as a separate issue,
- ✓Add managing areas for wilderness values to Issue No. 6,
- ✓BLM will need to take a hard look at the management direction for the lands immediately adjacent to roadless or WSA areas to ensure that management practices do not cause significant adverse impacts within the roadless or WSA lands,
- ✓Time for someone to push for release of areas that are not going to be designated wilderness,
- ✓Is BLM going to push for Congressional wilderness designation in the RMP process?
- ✓WSAs need to go away—present situation allows for no management of resources which is putting those resources in danger of loss of sustainability, diversity and water quality and quantity,
- ✓DFO must reinventory its lands and designate new WSAs,
- ✓DFO must ensure already designated WSAs are managed in a manner that protects wilderness characteristics,
- ✓take the area of the Axolotl Lakes out of the WSA near Virginia City,
- ✓BLM needs to utilize all available roadless data to refine current BLM information and designate all appropriate lands as roadless.

Some comments listed **specific areas for wilderness study**:

- ✓Axolotl WSA,
- ✓Ruby Mountain WSA.

## ***WILDLIFE (SEE ALSO SPECIAL STATUS SPECIES)***

Wildlife comments include: issues, habitat management plans (HMPs), the effects of livestock grazing on wildlife, sage grouse, species/area specific, wildlife corridors and habitat fragmentation, indicator species and other.

Some comments simply listed **issues**:

- ✓Wildlife friendly legal fences on all BLM lands,
- ✓Significant wildlife corridors for elk, antelope, sage grouse, mule deer,
- ✓Winter ranges,
- ✓Wildlife habitat preservation,
- ✓Habitat management plans,
- ✓Introduction of large carnivores,
- ✓Livestock diseases (domestic sheep, cattle and their effect on native wildlife especially big horn sheep),
- ✓Habitat enhancement.
- ✓Winter range,
- ✓Big horn sheep, beaver, moose, sage grouse, native trout, mule deer, lynx, grizzly bear, wolves, raptors, song birds, elk,
- ✓BLM should comprehensively consider several issues related to wildlife, wildlife habitat, resource protection, and various elements of resource use and recreation.

Some comments discussed **Habitat Management Plans (HMPs)**:

- ✓Habitat management plans should be developed for key/umbrella species such as big horn sheep for uplands, sage grouse for sagebrush steppe, beaver for riparian areas, ruffed grouse,
- ✓Develop an HMP for all native fish within the DFO including but not limited to cutthroat trout and grayling,
- ✓Consider preparing a management strategy for pygmy rabbits. HMPs should be prepared as key components for implementing management strategies,
- ✓Sage Grouse and Antelope: Please consider the development of an HMP for sage grouse and antelope a major issue during this planning process. Sage grouse should be considered a key indicator species for the health and function of the sagebrush-steppe riparian complex in and perhaps outside of the Project Area. Nesting the brood rearing habitats should be managed for maximum herbaceous vegetative cover and sage grouse spring, summer, fall forage production (forb and insects). This would include the sagebrush steppe habitat and interspersed riparian wetland habitats. Breeding complexes as defined by Connelly et al. 2000 should be permanently closed to livestock use,

✓Bighorn Sheep: Please develop an HMP for bighorn sheep. Bighorn sheep are extremely susceptible to domestic livestock diseases and competition for food, space and water. Their habitat should be protected from domestic livestock grazing as they can not effectively compete and survive with domestic stock over the long term. Protection of existing habitat and re-establishment of historic habitat (removal of domestic sheep) should be a priority. Please thoroughly review the impact of domestic livestock diseases including BVD, IBR, and others on bighorn sheep and other wildlife.

✓Beaver: Please also develop an HMP for beaver and recognize this species as a keystone species for riparian, water quality, water quantity and aspen, willow and cottonwood habitat and health. Beaver are a keystone riparian species that have been locally extirpated from much of their original habitat. One example is the north and south forks of Everson Creek. Another is the Middle Fork of Stone Creek. The Middle Fork of Stone Creek should be immediately protected from livestock grazing as grazing is completely destroying this riparian area, including woody vegetation, water quality, soil quality, herbaceous vegetation, and wildlife habitat. . . . . See the Role of Beaver in Riparian Habitat Management. Extension Bulletin. 38:1-8. This paper outlines the importance beaver play in very cost effective riparian habitat management and enhancement ,

✓GWA recommends the BLM develop Habitat Management Plans (HMPs) for the umbrella or keystone indicator species. BLM is urged to adopt clear objectives that specifically outline optimal habitat management as a priority for these species. ACECs should provide a foundation for habitat protection upon which population conservation can be built. For example, BLM should set an objective to manage optimally for sage grouse, including for not limited to existing breeding complexes, as an umbrella species within the sagebrush-steppe-riparian habitat complex. By setting an objective to manage for sage grouse, BLM should also be providing for other sagebrush-steppe-riparian meadow species within this habitat complex. HMPs should also be established for bighorn sheep, native fish (including grayling and westslope cutthroat trout) and beaver. Habitat protection should be the first priority through ACEC designation. Where these native species have been locally extirpated or populations are so low that long term survival is threatened, supplement reintroduction plans should be coordinated with the Montana Department of Fish, Wildlife and Parks.

Comments on the **effects of livestock grazing on wildlife** include:

✓Resting or excluding up to 25% of any given federal grazing allotment should be seen as readily achievable as soon as the BLM conducts its NEPA review for renewal of any given grazing permit. For example, a four pasture rest-rotation grazing system can be easily modified to allow deferred grazing of three pastures while protecting the fourth pasture as an ungrazed control or reference area for the entire term of the permit (usually 10 years). This can be done in most cases without modifying the stocking rate, as the consequences of livestock grazing appear to be an “all-or-nothing” phenomena. Within the broad range of “moderate or proper” grazing, sensitive species are most often reduced, while tolerant species predominate (Bock et al. 1993; Fleischner 1994), even if pastures are rested on a rotational basis (Holechek et al. 1999), unless grazing is so light as be economically impractical.

This concept can be applied ecologically to specifically protect sensitive species habitat, such as nesting cover and brood rearing habitat for sage grouse, bighorn sheep habitat (bighorns are intolerant of domestic livestock diseases and they do not compete effectively for food, space and water), or riparian complexes that provide native trout and/or beaver habitat. One example that exists on the DRA is the pasture containing the north and south forks of Everson Creek in the upper Horse Prairie country. This pasture has been rested, except for occasional trespass cattle use, since 1992. The educational benefits of protecting this area from livestock use are just beginning to reveal themselves, and this area should continue to be protected and perhaps expanded as an ungrazed reserve or Area of Critical Environmental Concern (ACEC). This pasture encompasses some sagebrush steppe habitat, coniferous forest habitat and riparian habitat, and provides key components for restoring water quality, beaver, sage grouse, lynx, native trout and other wildlife habitat in the area,

✓ With 95% of this area being grazed by domestic livestock, many key wildlife species are being put in peril. Sage Grouse is a primary one. I have hunted antelope in District 330 for the last 10+ years. During that time, I have seen first hand the quality of the hunt, quantity of animals and the number of permits offered all decline. Wildlife, especially native wildlife deserves to be accounted for in at least equal footing with domestic grazing. Domestic grazing erodes stream banks, lower water quality and quantity, displaces wildlife, and contributes diseases to the wildlife population, sheep being one example. In addition, by placing all of this very precious resource are under one ACEC a more coordinated and critical evaluation of the impacts can be undertaken,

✓ Establish Ecological Reserves: Domestic livestock grazing is a dominate use of BLM lands with the DRA (Personal Communications with BLM-95% of the DRA is grazed). Grazing can have a significant impact on a variety of wildlife and plant species, riparian areas, stream function, soils, ecological processes, water quality and quantity (Fleischner 1994). Some plant and wildlife species show an intolerance or no tolerance at all for livestock use. In extreme cases, this can lead to localized extinction on a landscape grazed by livestock (Bock et al. 1993). One example is the apparent intolerance of bighorn sheep to common livestock diseases, especially those carried by domestic sheep. Both the Melrose/Highlands and Tendoy bighorn sheep herds have suffered dramatic disease related die-offs on the DRA in the last ten years. Another example is the extirpation of beaver from many grazed riparian areas with the DRA. Some examples include: Stone, Muddy, McNinch, Sourdough, Gallagher, Dyce, Farlin, Cottonwood, Hinch, Garden, Fish, Price, Pete and Black and Deer Canyon Creeks. To Establish ecological benchmarks and protect habitat for species and processes intolerant fo the activities or presence of domestic livestock, please develop a system of ecological reserves or exclosures. The boundaries of these reserves should be based on ecological or watershed principles. Where feasible and appropriate, use existing fencing or natural barriers to establish the reserve boundaries. Ungrazed reserves should be established as a form of grazing mitigation, and to monitor the ongoing effects for the BLM's livestock management program. Bock et al. 1993 recommends at least 20% of the landscape be placed in ungrazed reserves with a minimum exclosure size of 1000 ha. We suggest 25% is more reasonable and readily achievable for public lands within the DRA.

This concept has immediate validity, as sound science demands controls. Most livestock exclosure studies suggest that livestock operate as a keystone species in rangeland ecosystems (Bock et al. 1993). In other words, livestock frequently determine which species will thrive and which will diminish. As well, there are instances within the DRA and the Beaverhead-Deerlodge National Forest where domestic livestock use of public lands has precluded the use of these lands by native vegetation and wildlife. Allocation of public lands for domestic sheep use, for example, in the Gravelly Mountains or the Medicine Lodge country of southwest Montana, has precluded the use of these areas by native bighorn sheep. As well, cattle grazing on some mountain streams has led to the degradation or complete destruction of willow, birch, dogwood and aspen communities (Stone and Cottonwood Creeks in the Ruby Mountains of southwest Montana), altering important riparian habitat, and eventually leading to the local extirpation of beaver and native riparian vegetation. Beaver are a keystone species, and their loss leads to the loss of a diverse riparian-wetland habitat type and a variety of other wildlife species (See Wyoming Game and Fish Department, Habitat Extension Bulletin N. 38, Jan. 1993 outlined below),

✓RMP should also consider the cumulative effects of developing water sources for livestock use. Connelly et al. (2000) state that to protect summer/brood-rearing habitat, development of springs for livestock water should be avoided. While a few individual livestock water developments in uplands may have negligible effects on a large sage grouse population, the cumulative effects of many such developments, particularly in areas where habitat or populations are already compromised, may be substantial. There are now more livestock water developments in more locations in Montana than ever before. Reservoirs, dugouts, and pipelines have all increased in numbers over the last half-century, thereby increasing the distribution of livestock. This has allowed livestock to utilize forage resources that were not used in the past because of their distance from water. (Surber 2001). Idaho fescue and blue bunch wheatgrass, the principle grass species of these allotments, are decreaseers. It is likely that herbage production and residual cover will be reduced in areas influenced by new water developments, and that such factors could have significant individual and cumulative effects on productivity of sage grouse,

✓Disease from domestic livestock, both sheep & cows, is a major concern for native wildlife especially big horn sheep. Please include disease as a major planning issue & fully disclose & study findings for the Tendoy . . . .

Comments specific to **sage grouse** include:

✓Sage grouse enhancement is an issue,  
✓Why have sage grouse hunting one year and put it on the endangered list the next?  
✓Existing sage grouse habitat in the DFO can be protected and populations of sage grouse conserved if significant management changes are implemented, especially regarding fire management and grazing,  
✓Wildlife corridors for sage grouse are an issue,  
✓RMP should also consider the cumulative effects of developing water sources for livestock use. Connelly et al. (2000) state that to protect summer/brood-rearing habitat, development of springs for livestock water should be avoided. While a few individual livestock water developments in uplands may have negligible effects on a large sage

grouse population, the cumulative effects of many such developments, particularly in areas where habitat or populations are already compromised, may be substantial. There are now more livestock water developments in more locations in Montana than ever before. . . ,

✓There is no scientific proof that grazing has anything to do with sage grouse decline,

✓Livestock grazing is a key factor in the degradation of riparian habitat in the DFO.

Livestock use within the sagebrush-steppe and interspersed riparian habitats is especially damaging to sage grouse populations, along with a variety of other wildlife. However, sage grouse as a sagebrush-steppe obligate, should serve well as a key indicator or umbrella species for the health and function of this habitat complex. . . . ,

✓Sage Grouse and Antelope: Please consider the development of an HMP for sage grouse and antelope a major issue during this planning process. Sage grouse should be considered a key indicator species for the health and function of the sagebrush-steppe riparian complex in and perhaps outside of the Project Area . . . . ,

✓The RMP/EIS should include measures to improve the likelihood of persistence of sage grouse and other species dependent on sagebrush and rangeland habitats. Actions clearly are needed to ensure that there will not be a need in the future to list sage grouse or other sagebrush dependent species in Idaho as threatened or endangered and, more broadly, to ensure these species and their habitats are conserved and restored,

✓In this regard, it is critical that the RMP/EIS incorporate recently adopted sage grouse guidelines that were developed by the Western Association of Fish and Wildlife Agencies and published in the *Wildlife Society Bulletin* (28:967-985). The plan must clearly demonstrate how these guidelines have been incorporated or explain in detail the reasons for any deviations from them. Important parameters such as grass residues for sage grouse nesting cover must be addressed,

✓See also comments under Availability & Management of Public Lands for Commercial Uses, Grazing; ACEC Designations, and Vegetation,

**Species/Area specific** comments include:

✓Ruffed and blue grouse: ruffed grouse area an aspen obligate. Both species depend on healthy riparian areas to raise broods,

✓Another species that is declining across much of its range is mule deer. The Institute encourages the BLM to consider impacts of the emergency fire rehabilitation plans on mule deer habitats. Mule deer require substantial shrub components in their habitats. Timing, size and configurations of prescribed burns are important considerations for mule deer. Rehabilitation of wild fire sites is also critical to mule deer, in that shrubs must be brought back into the habitat as soon as possible,

✓Mt. Jefferson inclusion area needs to be protected for wolverine habitat.

Comments on **wildlife corridors and habitat fragmentation** include:

✓The RMP should consider the role of BLM lands in promoting wildlife linkage corridors between the Greater Yellowstone Ecosystem and the Salmon-Selway Wilderness Complex. In addition, the RMP should promote the interstate movement of populations of wildlife including elk, sage grouse, wolf and grizzly bear. Many of these populations

only use BLM lands in the Dillon Resource Area on a seasonal basis and migrate across state lines on a regular basis. The Dillon RMP should be compatible with the plans and mandates of neighboring states and jurisdictions,

✓Wildlife corridors are lands that lie between key wildlife habitats and allow for secure wildlife movement. The Ninth U.S. Circuit of Appeals has defined corridors as “[a]venues along which wide-ranging animals can travel, plants can propagate, genetic interchange can occur, populations can move in response to environmental changes and natural disasters, and threatened species can be replenished from other areas.” The Ninth Circuit also mandates analysis and evaluation of wildlife corridors as part of the NEPA process. The Dillon Resource Management Plan must analyze and provide for wildlife linkage as part of this planning process. Presently, habitat connectivity analysis has been mandated in the Upper Columbia River Basin Integrated Scientific Assessment, in the U.S. Forest Service conservation strategy for Western Forest Carnivores, and in the Interagency Grizzly Bear Recovery Plan. Habitat connectivity is also a logical precept to achieve compliance with the letter and spirit of the National Forest Management Act of 1976, the Endangered Species Act of 1973, and the National Environmental Policy Act of 1972. Conceptual models for wildlife habitat incorporating such movement corridors, along with core areas and buffer zones, have now been proposed by several researchers as long-term frameworks for regional wildlife conservation. Wildlife movement corridors have been identified or broadly outlined in the draft Grizzly Bear Management Plan for Southwestern Montana, Interagency Grizzly Bear Committee, U.S. Fish and Wildlife Service, U.S. Forest Service and several independent scientific maps and analyses by Dr. Lance Craighead, American Wildlands, and Dr. Reed Noss. Attached is American Wildlands’ Least Cost Path mapping and analysis, which identifies the best potential wildlife corridors in the U.S. Northern Rockies. Areas that should receive special consideration for wildlife connectivity include the Centennial Valley, Madison Valley, Virginia City area, Monida Pass, Clark Canyon area, Bannack Pass, Humbug Spires area Silver Star area, and Blacktail area (see attached maps for more details). These areas should receive special management consideration. The U.S. Fish and Wildlife Service has recommended that public lands with linkage potential be managed as summer elk habitat. American Wildlands recommends that high quality linkage habitat should be left undisturbed and medium quality habitat should be managed to minimize human disturbance and habitat alteration. The Dillon RA should maintain a corridor core of high quality habitat approximately 5 km in width, with a 5 km buffer zone of medium quality and/or low quality habitat on either side of the core. Both the core and the buffer zone constitute the corridor. Within the core and buffer zone, human activities with known adverse effects on important wildlife species should be minimized. Such activities include road building, commercial timber harvesting, mining, and oil and gas field development.

- a) no single square miles section in this corridor should exceed the 1 mi./square mi. standard for grizzly bear security.
- b) the core habitat should approach the 0.75 mi./square mi. standard for elk security habitat. New road building should be excluded and existing roads should be removed to conform to these standards.
- c) minimize motorized use of any remaining roads within the corridor.

d) off-road motorized vehicle use should be prohibited within the corridor.  
e) closures of existing roads and trails to all uses should be a management option seasonally or in localized areas if there is known use of an area by TE&S species.

No segment of the corridor core should be less than 1 km wide (500 m to either side of the centerline; a minimum distance for adverse effects upon grizzly bears (Mace and Manley 1993). The Dillon RA should commit to working with other land management agencies, the Department of Transportation, landowners, land trusts and conservationists on providing crossing structures and protected habitat wherever corridors intersect known barriers such as highways. The Dillon Resource Management Plan must assess potential wildlife linkage in southwestern Montana, including regional linkages that cross BLM boundaries to secure habitats on private, state, or other federal lands. The EIS should develop alternatives that offer specific management prescriptions to retain wildlife linkage in key areas,

✓Gravelly-Tobacco Roots Wildlife Corridor: BLM lands are critical to linking wildlife habitat between the Gravelly and Tobacco Roots Mountains. These lands need to be managed for wildlife and an emphasis should be placed on consolidating public land ownership there, ideally by selling or trading isolated BLM parcels elsewhere in exchange for private lands in the corridor,

✓The RMP should consider the role of BLM lands in promoting wildlife linkage corridors between the Greater Yellowstone Ecosystem and the Salmon-Selway Wilderness Complex. In addition, the RMP should promote the interstate movement of populations of wildlife including elk, sage grouse, wolf and grizzly bear. Many of these populations only use BLM lands in the Dillon Resource Area on a seasonal basis and migrate across state lines on a regular basis. The Dillon RMP should be compatible with the plans and mandates of neighboring states and jurisdictions (IDFG 1997),

✓Old growth habitats should be mapped and delineated by species. The effects of past harvesting, roading and grazing on habitat fragmentation will also need to be addressed and analyzed,

✓Please provide an analysis of wildlife corridors across the Resource Management area. This analysis already exists, so the wheel does not have to be reinvented. In addition to mapping corridors for wide-ranging species, the corridor analysis should include discussion of management implications and direction in order to secure the future of these corridors across the landscape,

✓All wildlife corridors as described by the American Wildlands and Greater Yellowstone Coalition should be included as special areas, ACECs. Whereas the BLM put the onus on the public sector to describe the specific areas that a person believes should have ACEC protection, I will defer to the works of these two mentioned conservation groups, for they have resources to compile what an average citizen such as I would not be able to do in a timely manner. This resource area is only one piece a very complex puzzle of environmental integrity that deserves proper review and analysis,

✓Gravelly-Tobacco Roots Wildlife Corridor: BLM lands are critical to linking wildlife habitat between the Gravelly and Tobacco Roots Mountains. These lands need to be managed for wildlife and an emphasis should be placed on consolidating public land ownership there, ideally by selling or trading isolated BLM parcels elsewhere in exchange for private lands in the corridor,

✓The RMP should consider the role of BLM lands in promoting wildlife linkage corridors between the Greater Yellowstone Ecosystem and the Salmon-Selway Wilderness Complex. In addition, the RMP should promote the interstate movement of populations of wildlife including elk, sage grouse, wolf and grizzly bear. Many of these populations only use BLM lands in the Dillon Resource Area on a seasonal basis and migrate across state lines on a regular basis. The Dillon RMP should be compatible with the plans and mandates of neighboring states and jurisdictions (IDFG 1997),

✓The Ninth Circuit also mandates analysis and evaluation of wildlife corridors as part of the NEPA process. The Dillon Resource Management Plan must analyze and provide for wildlife linkage as part of this planning process. . . . The Dillon RA should maintain a corridor core of high quality habitat approximately 5 km in width, with a 5 km buffer zone of medium quality and/or low quality habitat on either side of the core. Both the core and the buffer zone constitute the corridor. Within the core and buffer zone, human activities with known adverse effects on important wildlife species should be minimized. Such activities include road building, commercial timber harvesting, mining, and oil and gas field development. . . . . The Dillon RA should commit to working with other land management agencies, the Department of Transportation, landowners, land trusts and conservationists on providing crossing structures and protected habitat wherever corridors intersect known barriers such as highways. The Dillon Resource Management Plan must assess potential wildlife linkage in southwestern Montana, including regional linkages that cross BLM boundaries to secure habitats on private, state, or other federal lands. The EIS should develop alternatives that offer specific management prescriptions to retain wildlife linkage in key areas. . . . . Conceptual models for wildlife habitat incorporating such movement corridors, along with core areas and buffer zones, have now been proposed by several researchers as long-term frameworks for regional wildlife conservation. Wildlife movement corridors have been identified or broadly outlined in the draft Grizzly Bear Management Plan for Southwestern Montana, Interagency Grizzly Bear Committee, U.S. Fish and Wildlife Service, U.S. Forest Service and several independent scientific maps and analyses by Dr. Lance Craighead, American Wildlands, and Dr. Reed Noss. Attached is American Wildlands' Least Cost Path mapping and analysis, which identifies the best potential wildlife corridors in the U.S. Northern Rockies. Areas that should receive special consideration for wildlife connectivity include the Centennial Valley, Madison Valley, Virginia City area, Monida Pass, Clark Canyon area, Bannack Pass, Humbug Spires area Silver Star area, and Blacktail area (see attached maps for more details). . . . . These areas should receive special management consideration. The U.S. Fish and Wildlife Service has recommended that public lands with linkage potential be managed as summer elk habitat. American Wildlands recommends that high quality linkage habitat should be left undisturbed and medium quality habitat should be managed to minimize human disturbance and habitat alteration. The Dillon RA should manage these corridor areas as critical habitat for threatened, endangered and sensitive species. These areas should be managed conservatively for habitat whether they are currently occupied or not,

✓Issues: significant wildlife corridors—elk, antelope, sage grouse, mule deer,

✓The flip side of fragmentation is ensuring that migration corridors and other ecological

linkages are maintained. The conservation biology literature indicates it is probably more effective to preserve existing corridors than to attempt to create new ones. Consequently, it is crucial the plan identify all existing migration corridors and ensure that management actions recognize and take steps to protect their integrity,

- ✓The plan must carefully evaluate and provide for preventing habitat fragmentation and for maintaining connectivity of habitats. In particular, habitat fragmentation is associated with the road building that accompanies most management activities.. We also incorporate by reference as article by Reed Noss found at . . . and we ask that all issues relative to roads and wildlife that are raised in that article be considered in the plan. . . . ,
- ✓The plan should consider and adopt the principles of island biogeography so as to ensure that fragmentation does to degrade existing wildlife habitats. That is, it must ensure that small islands of habitat are not created by management activities such as logging or chaining. The plan should ensure both that the total areas of important habitats are maintained and that these habitats are not further fragmented. . . . .

.Defenders specifically requests that BLM limit any further fragmentation of sagebrush communities, which are critical to many species on many BLM lands.

Comments on **indicator species** include:

- ✓Examples of species that have experienced dramatic declines or have already been extirpated from some of their historic habitats within the DFO include sage grouse, grayling, westslope cutthroat trout, beaver, bighorn sheep, moose, bison ,grizzly bears, wolves, rough fescue, bluebunch wheatgrass, big sagebrush, service berry, aspen and cottonwoods. Livestock grazing should be considered at least one of the major changes that is needed under ACEC designation to protect and conserve wildlife values. The suitability of livestock use within these important wildlife habitats must be critically evaluated, ungrazed ecological reserved should be established and the objectives for management of these areas should change to focus on the recovery and protection of umbrella or keystone species habitat. . . . . ,
  - ✓Management indicator species for wildlife will need to be identified,
  - ✓Habitat management plans should be developed for key/umbrella species such as big horn sheep for uplands, sage grouse for sagebrush steppe, beaver for riparian areas, ruffed grouse,
  - ✓Beaver are a keystone species, and their loss leads to the loss of a diverse riparian-wetland habitat type and a variety of other wildlife species (See Wyoming Game and Fish Department, Habitat Extension Bulletin N. 38, Jan. 1993 outlined below),
  - ✓In addition to protecting special habitats, the plan must provide for protecting certain species to ensure that biological diversity is protected. The plan should identify and provide for the protection of “keystone” species, which often are literally key to preventing undesirable cascading ecological effects, such as widespread extinctions. . . . .
- . . BLM should ensure that the plan makes special provision for protecting keystone resources.

**Other** comments include:

✓We (Defenders of Wildlife) want to highlight the list of native wildlife species occurring in the area of the Dillon Field Office attached to these comments, and incorporated into them by this reference. This list includes federally listed endangered and threatened species and species ranked G1 (critically imperilled), G2 (imperilled), and G3 (vulnerable) by the Montana Natural Heritage Program and NatureServe and are particularly sensitive to activities on the ground throughout the Dillon RMP planning area (see list in letter 221),

✓As requested above, all riparian areas should be designated ACECs, and livestock grazing must be carefully managed in these areas, and possibly eliminated in some circumstances, as provided for in BLM's Fundamentals of Rangeland Health and livestock grazing standards and guidelines. Oil and gas leasing should not be permitted in riparian areas, or at a minimum, leases in these areas should contain a no surface occupancy stipulation. It is widely recognized that (1) riparian areas in the west are crucial centers of biological diversity and (2) most BLM riparian areas are in unhealthy condition, so special management provisions for these areas must be made in the plan. . . . The plan must also ensure that other special habitats are protected and enhanced. . . . Wintering areas, colonial or other concentrated avian nesting areas, spawning beds, and traditional birthing areas are examples of the special habitats the plan should provide for an protect.

✓Manage public lands more for the benefit of fish and wildlife than for livestock,

✓We encourage the BLM to be careful in constructing the policy for fire rehabilitation with regard to critical wildlife habitats. There are many opinions and ideas on how best to approach this complex problem. With wildlife habitats, what is beneficial to a particular wildlife species may not be beneficial to another species. Consequently, it is important that enough flexibility is built into the plan to address these concerns. In other words, one plan may not fit all situations,

✓Defenders also request that BLM consider and enunciate in the plan a policy relative to increasing the amount of habitat "edge". Modern conservation biology recognizes a number of problem associated with increasing the amount of edge, such as: modifying microclimates needed by some species, increasing impacts of wind in some communities, increasing the incidence of fire, and increasing predation and competition form exotic and pest species that are often well adapted to the disturbed conditions that characterize ecological edges. . . . ,

✓Wildlife habitat such as winter range, cover and forage areas, and other key habitats need to be identified and mapped,

✓EPA comments (letter 155, pages 32-33),

✓Coordination: How is the BLM coordinating with the Beaverhead-Deerlodge National Forest, the U.S. Fish & Wildlife Service, Red Rock Lakes National Wildlife Refuge, Department of State Lands, Montana Department of Fish, Wildlife & Parks, Madison and Beaverhead Counties, private landowners, Targhee & Salmon National Forests in Idaho, the BLM in Idaho, the Idaho Department of State lands, the U.S. Sheep Experiment Station and the Idaho Fish and Wildlife Department? Coordination between these agencies and landowners may prove critical for the survival and successful management of several wildlife species and habitat complexes, including sage grouse and the sagebrush-steppe habitat complex. The plight of sage grouse

populations in Montana is often assumed a result of winter habitat destruction in Idaho and Montana. Where and how has this winter habitat specifically been altered or destroyed and what winter habitat remains on public and private lands within the sage grouse breeding complex that uses habitat in both Montana and Idaho? What other wildlife may be dependent on habitat in Idaho, private lands or on other public lands?

✓Do not try to limit fish to one specific type—e.g. Westslope cutthroat,

✓The BLM has allowed 56-60" height bottomwire 9-11" above ground to be constructed on our public lands. We feel BLM is in violation of the UIA of 1885 as well as their own fence manual specifications and instruction memoranda (enclosed). BLM has falsified the diagram for such a fence in their own manual and back-dated the illustration to 1985. The manual was written in 1986. This is fraud by a governmental agency. There must be moratorium on the construction of any more high tensile fences on public lands and an investigation into wildlife mortality and public access with the existing fences. This is also our RMP recommendation.

✓How will BLM/DFO utilize the tools of high yield agriculture to provide additional wildlife habitat and a healthier environment?

## ***SPECIAL STATUS SPECIES (SEE ALSO WILDLIFE)***

Special Status Species comments include: requests for information, how BLM would protect special species, Axolotl salamander, lynx, and other.

One comment simply indicated that this is an issue while another indicated that people have to be more important than the endangered species. Another comment indicated support for endangered species should be encouraged through positive incentive based programs that are still supportive of multiple use when appropriate, and that any plans or alternatives for these species should be voted on by the legislative body of the state of Montana (not the agencies).

### **Comments requested:**

✓Information on the strategies BLM would use to ensure a designated species is rapidly recovered,

✓A thorough analysis of T&E occupancy and habitat including mapping of important habitat components as well as management direction which is compatible with the habitat needs of area T&E species,

✓A comprehensive survey of rare, threatened and endangered plants, plus a discussion of limiting factors related to the better establishment of these species as well as a plan for protecting existing populations and addressing population limiting factors.

Other comments ask how **BLM would protect special status species while:**

✓Protecting the local custom, culture and economy,

✓Protecting prior existing water rights and supporting Montana water law,

- ✓Ensuring the designation does not make “innocent species” the enemy,
- ✓Meeting contractual obligations to permittees,
- ✓Not precluding use.

Comments specific to the **Axolotl (Tiger) salamander** include:

- ✓As NEPA requires a “hard look” at the affected environment and amphibians are part of the environment, it would seem reasonable to include amphibians in the NEPA process as is the current practice with fish and wildlife. This analysis would be particularly significant given the recent acquisition of the Axolotl Lake property . . . . . Amphibian mass population declines can significant cumulative effects on the environment. . . .One obvious management opportunity for amphibians is the presence of natural or man-made fish barriers in streams, creating “amphibian refuges,” by protecting amphibians from predatory fish. . . . The CDC notes a larger issue related to amphibian declines is the translocation of infectious diseases, or pathogen pollution, into plant and animal populations previously unexposed,
- ✓Protection of the Axolotl Lakes is urgent to save Axolotl (specific concerns include encroaching development, motorized use and threat of introduced fish).

Comments specific to the **lynx** include:

- ✓Listed under the Endangered Species Act—please develop an HMP,
  - ✓We understand that the BLM on a statewide level is developing a lynx conservation plan, which will be incorporated into the RMP when finished. However, the BLM is still required by NEPA to identify lynx habitat within the Resource Management Area, and to conduct field surveys for lynx. Without that appropriate level of analysis, the RMP will merely include management standards for lynx, with no direction on where to apply those standards on the landscape. We request that the RMP include a thorough analysis of lynx habitat and lynx occupancy within the RMA,
- ✓Need special attention to Canadian lynx habitat areas.

**Other comments** include:

- ✓Attached to these comments is a list of rare, unique, or sensitive species that occur in the area of the Dillon Field Office. We ask that BLM consider designating ACECs to protect these species. The rarity and/or uniqueness of these species means they are “important” by definition. That fact that they are rare also shows “special management attention” is needed; or, in the case of inherently rare species, that special management is needed to protect what is often very limited habitat. Furthermore, in our view the loss of species through extinction or the continued decline of species (especially already-rare species) constitutes “irreparable damage” in both ecological and quality-of-life terms (Defenders of Wildlife),
- ✓Defenders believes that specialized (more geographically refined) standards and guidelines may be warranted, needed, or required where threatened or endangered species exist or where critical habitat (or an ACEC) for these species has been designated. Other special status species, including those on the attached list, should also be considered in this regard,

✓First is the need to engage in careful biological assessments to determine if listed species in the areas of the Dillon Field Office are likely to be adversely affected by the plan, or actions carried out under the plan. It is critical that only credible and reputable scientists conduct biological assessments, and BLM must ensure that this is the case by establishing appropriate criteria in the plan. This is consistent with the requirement to use the best available science established by the ESA. . . .Second is the need to engage in consultation with the Fish and Wildlife Service and/or the National Marine Fisheries Service (collectively, “the Services”) relative to any listed species that occur in Dillon Field Office and which may be adversely affected by actions authorized by the plan or contemplated in the plan.

## **AVAILABILITY & MANAGEMENT OF PUBLIC LANDS FOR COMMERCIAL USES**

Comments on the availability and management of public lands for commercial uses include: issues, general, mining, forestry, oil and gas development and grazing.

Some comments simply indicated the following topics are **issues**:

- ✓Availability and management of public lands for commercial use,
- ✓Access for mineral development,
- ✓Mining,
- ✓Timber, timber management, timber logging/harvest, selective logging,
- ✓Continued grazing, grazing,
- ✓Closing some areas to grazing/reduced grazing on public lands,
- ✓Suitability of livestock use and livestock management should be major issues,
- ✓Past disturbances–timber harvest, grazing allotments, sagebrush control, mining, oil and gas development.

One comment also indicated BLM needs to **better define the issues**, particularly the one about commercial uses.

**General comments** on availability and management of public lands for commercial uses include:

- ✓Since sustained yield can be achieved by providing for regular periodic outputs of renewable resources, we ask that BLM consider this measure of sustained yield rather than just high level annual measures. Occasional (periodic) outputs of some resources may be a far more sustainable means to manage for multiple use in perpetuity than to attempt to produce the resource annually, especially at a “high-level.” For example, drought could well make livestock grazing unadvised and unsustainable in some years if other resource values such as wildlife are to be protected and maintained,
- ✓#1priority is to keep a steward on the land with agency concern in making it economically workable for them to stay in business,
- ✓How will BLM/DFO act to support prior existing water rights and Montana water law?

- ✓ All commercial uses should be considered as viable options with the following stipulations----they address the control of noxious weeds, contribute to the local economy, and support sound scientific conservation practices,
- ✓ In light of recent terrorist activity, we as a nation should manage these lands to be as productive as possible. They should provide consistent livestock grazing, minerals, gas production??, wildlife habitat & maintain our watershed. These lands should be productive, not locked up, taking away from our strengths as a nation,
- ✓ With America in the shape it's in, we can't be dependent on other countries--we have to produce our meat and food at home. We also have to look positively at mining, drilling for oil and timber.

Specific comments on **mining** include:

- ✓ We need more mineral development; Hi tech products are all a product of mining,
- ✓ What will the BLM/DFO do to revitalize the mining industry in Beaverhead County?,
- ✓ Management plan should include a map showing current mining activities, valid preexisting rights and areas withdrawn from mineral entry. If mining activities are proposed, the plan should include an assessment of impacts on area resources. EPA is concerned regarding impacts to water quality from acid rock drainage and metal and nitrogen contamination of surface and ground water,
- ✓ Mining on public lands should not be permitted.

Specific comments on **forestry** include:

- ✓ The Montana Streamside Management Zone law and rules should be complied with (reference included--letter 155),
- ✓ Need a program of long-term, sustainable forestry, removing just enough mature trees each year (from BLM and Forest Service lands) to keep a local one or two person mill in business (but no new roads),
- ✓ What will the BLM/DFO do to revitalize Beaverhead County's forest industry?
- ✓ Timber must be managed to meet forest health needs including both harvesting and burning. We have more roads now that the taxpayers can afford to maintain, so emphasize temporary roading with road obliteration following management.

Specific comments on **oil and gas development** include:

- ✓ We need oil and natural gas development to carry the load while renewable is developed to be economically feasible,
- ✓ The RMP should consider adoption of oil and gas leasing for the DFO in accordance with the December 29, 1988 letter to the NWF,
- ✓ Drilling for oil and gas on public lands should not be permitted,
- ✓ We need more oil and gas leasing,
- ✓ Some areas of the Dillon RA have not been available for oil and gas leasing for almost 20 years. Get this plan done so leasing can resume in those areas,
- ✓ Request a discussion of development potential and leasing areas identified on maps along with lease stipulations spelled out for each area,
- ✓ The plan should specifically exclude oil and gas development from all roadless areas, WSAs, ACECs and T&E species habitat,

- ✓The following factors should be included in analysis– management options that would protect opportunities to explore for and develop oil and gas resources, management options for surface resource management that are compatible with oil and gas resource management objectives, reasonable mitigation measures designed to limit or avoid impacts to surface resources will be examined as a means to lessen restrictions on access to public lands for leasing, lack of oil and gas resource potential or current industry interest will not be used as a basis for closing lands or imposing constraints on exploration and development activities,
- ✓For fluid minerals—it is necessary to include the basic elements of the SPG as planning criteria—the SPG elevates the mineral resources to an equal level with all other resource values,
- ✓How will valid existing rights be affected by the new leasing EIS? ,
- ✓How will the opportunities to explore for and develop oil and gas resources be affected by the management of other surface resource management decisions?,
- ✓How will BLM manage areas of low, moderate, high and unknown potential for oil and gas in the study area?,
- ✓How will BLM provide for interim development during the planning process? BLM has the authority and discretion to condition its approval of proposed actions with reasonable measures so as to reduce the effect of actions on other resources . . . .in view of this direction, I urge the DFO to adhere to the intent of this guidance and allow for exploration and development activities to take place during the course of the planning action,
- ✓For Oil and Gas, recommend that an analysis of the following types of effects be included in the environmental consequences section of the RMP—effects on opportunities to explore for, lease and develop oil and gas resources resulting from restrictive surface management decisions, the application and viability of reasonable mitigation, limit the study to any residual effects that may be present after standard lease terms and conditions have been imposed,
- ✓The effects on oil and gas opportunities from surface management is only tied---not limited to---economic impacts. Access to public lands for purposes of exploring for and producing oil and gas resources must be considered a separate issue from economic impacts. It must be explained how surface management constrains the availability of public lands for leasing, exploration and potential development. Moreover, compliance with the various laws that require all lands to be evaluated for lease is an access issue that has nothing to do with economics,
- ✓How will BLM determine the cumulative impacts of reasonable foreseeable oil and gas development?,
- ✓To what extent will the BLM identify available mitigation measures to minimize or avoid possible impacts that could result from future oil and gas activities?,
- ✓There are enough restrictions already on oil & gas leasing, standard stipulations are adequate to protect most wildlife
- ✓Defenders believes that the plan should adopt a prohibition on any oil, gas, or coal leasing prior to completion of an environmental impact statement (EIS) analyzing the proposed leasing. This is necessary to ensure that an informed balancing can be made as to whether leasing is appropriate or is outweighed by other resource values. Waiting

to do site-specific analyses until after a lease is granted is simply too late at that time the basic right to develop oil, gas, or coal has been granted and the nature (impacts) of potential projects can only be “tweaked,” not precluded. . . . Alternatively, all leases should be issued with a no surface occupancy stipulation on the entire lease, pending completion of an EIS to determine if surface occupancy can be allowed. We believe these recommendations are consistent with the provisions in BLM’s Land Use Planning Handbook,

✓Somewhat similarly, the plan should adopt a prohibition on oil, gas, and coal leasing whenever reasonably foreseeable development projections have been exceeded, especially if this development is occurring due to new technological innovations. Coalbed methane is clearly the model in this regard: many development proposals for this method of extracting methane far outstrip the reasonably foreseeable development scenarios in existing RMPs, largely because this technology was not even envisioned when many RMPs were prepared,

✓The plan should adopt a policy that no roadless lands identified by BLM or by citizens’ groups as qualifying for wilderness designation be leased, whether the area is recommended by BLM as wilderness or not. Moreover, the plan should adopt a policy against allowing energy exploration, particularly for oil and gas, in roadless areas. This will ensure that Congress has a full opportunity to determine if wilderness is the appropriate designation for these lands, and that it does not have to deal with “tainted goods.” It would be appropriate for the plan to set requirements to provide maps, a detailed narrative description of the acres, and a statement of reason as to why any prior determination by BLM as to the wilderness quality of the area is incorrect,

✓BLM’s regulations regarding environmental protection at the field development and well drilling stage are general and non-specific. Consequently, the plan should adopt specific guidance as to what constitutes “undue damage to surface or subsurface resources” and what specifically must be achieved to “reclaim the disturbed surface . . . Defenders believes that any activity that reduces the ability of a threatened or endangered species to recover or that reduces the amount of critical habitat for these species should be treated as undue damage. Likewise, Defenders believes that any activity that interferes with critical breeding , feeding, or sheltering activities of listed species, either directly or through habitat modification, should be treated as undue damage and prohibited by the plan. Just as important, it is crucial that the plan and any subsidiary instruments (leases, APDs, surface use plans, etc.) provide assurance of adequate inspection and enforcement as a precondition to lease issuance and operations,

✓No surface occupancy stipulations should attach to most if not all leases that could threaten important wildlife habitat or use areas, particularly if site-specific impacts are unknown or poorly known when the land is lease. All riparian and wetland areas should be subject to no surface occupancy stipulations. Special time limitations should be adopted to ensure the protection of winter range areas raptor nesting and feeding areas, habitats used by threatened or endangered species or other special status species, and aquatic habitats,

✓Extraction of coalbed methane has become rampant in some areas, so special precautions must be taken in the plan to ensure resource protection in the face of this

development pressure. The plan must prohibit the dumping of water extracted from coal beds onto the ground or into surface waters. This is particularly true of saline “produced” water,

✓Rights-of-way are often part-and parcel of oil and gas development, as well as many other activities. All provisions in the Mineral Leasing Act and FLPMA must be adhered to relative to rights-of-way to help ensure environmental protection. Defenders specifically requests that the plan address several issues. The issue of the impact of power lines on birds and bats should be addressed, particularly with regard to raptors. Electrocutions are one negative impact of power lines, and electrocutions could violate the Migratory Bird Treaty Act and Bald Eagle Protection Act, not to mention ESA. The plan should make provisions to ensure these laws are not violated if rights-of-way are granted. Perhaps just as importantly, power lines change the “structure” of habitat, which may create favorable conditions for some species by be unfavorable for others.

Specific comments on **grazing** include:

✓Defenders also request that the plan address and insure enforcement of the regulatory provisions at 43 C.F.R. § 4140(c). These regulations provide for civil penalties, including permit cancellation, for violation of various environmental pollution laws by grazing permittees, in connection with public lands grazing. Of particular interest to Defenders are the prohibitions on pollution of water sources, illegal take or destruction of wildlife, and violation of the Bald Eagle Protection Act and Endangered Species Act by grazing permittees. The plan should make provision for monitoring the compliance of permittees with regard to these requirements, and ensure that actions are taken to enforce them where they are violated. Likewise, the plan should make provision for monitoring unauthorized grazing use and taking actions to rectify this situation if it is discovered. . . . Consequently, the plan should establish a schedule for developing AMPs for all allotments in the area covered by the plan, and ensure that schedule is adhered to. Relative to AMPs, several things need emphasis. They are to be tailored to the specific range condition in an area and are to be reviewed periodically “to determine whether they have effective in improving the range condition of the lands involved . . .” Thus, improvement of range condition is a paramount reason for developing and revising AMPs, and the plan should make specific and binding provisions to ensure this overarching purpose is effectively served. It is imperative that all AMPs provide for regular monitoring or field observations to determine whether grazing use or patterns of use require changes in the amount of permitted livestock use so as to protect rangeland condition and health . . . It is also important to emphasize that the Public Rangeland Improvement Act states that “native vegetation” is “normally identified with a healthy and productive range condition,” so emphasizing nonnative species as a means to improve range condition is statutorily discouraged. . . . We also ask that BLM address compliance with the “Comb Wash Decision” in its land use plan. National Wildlife Federation v. BLM, 140 IBLA 85 (1997). That case held that the site specific impacts of grazing must be addressed at some point-if not in a resource management plan, than in later site-specific environmental analyses (e.g., when an AMP is developed or a livestock grazing permit is issued). That plan should state clearly and in a binding way at what administrative level the site-specific impacts of

grazing will be addressed and when that assessment will occur. Moreover, the plan should provide guidance as to what assessments will be needed on a site-specific basis and make provision to ensure those assessments are thorough and science-based, if these required analyses are not undertaken in the plan itself. Similarly, the plan should also state how the balancing of values needed to ensure that grazing best meets the present and future needs of the American people will be accomplished. . . . As indicated above, Defenders specifically requests that the relative value of threatened or endangered species and other special status species, including those on the attached list, be considered in the balancing and site-specific evaluations required by the Comb Wash Decision,

✓How will the BLM/DFO use livestock grazing as a tool to achieve management goals without the use of fire, chemicals or machinery?

✓The plan should identify current and projected impacts from grazing activities including impacts to fish and riparian habitat and how grazing will be managed to meet management objectives,

✓The plan should include an analysis of the cost effectiveness of precluding streamside grazing in contrast to permitting grazing supplemented by additional monitoring and mitigation to protect river resources. State of Montana's grazing BMPs can be found at. . . (letter 155),

✓Livestock grazing is a key factor in the degradation of riparian habitat on the DRA—livestock use within the sagebrush-steppe and interspersed riparian habitats is especially damaging to sage grouse populations, along with a variety of other wildlife,

✓The RMP/EIS must address how individual grazing allotment plans will be incorporated into the overall plan. Critical issues such as stocking rates, grazing intensity, timing of grazing, and grazing duration must be addressed and the plan must identify how these activities will be managed to achieve the desired veg conditions. Stocking rates of all herbivores must be addressed,

✓In addition to the standards as set out by the Western MT RAC, consider additional action related to livestock grazing management that may be necessary to assure adequate short and long-term conservation of other natural resources, particularly within ACECs,

✓Livestock grazing use in association with wild and prescribed fire management in sagebrush-steppe-riparian habitats is a significant cause of sage grouse habitat degradation. Since 95% of the DRA is currently grazed by domestic livestock, including all of the proposed ACECs, livestock suitability is one of the key factors that must be addressed and changed under the ACEC designation,

✓Livestock grazing is a key factor in the degradation of riparian habitat on the DRA. Grazing management may and protection from grazing can lead to riparian recovery. No grazing in the DRA would benefit wildlife and water quality and have to significant impact on the regional economy,

✓The RMP should also consider the cumulative effects of development water sources for livestock use. There are now more livestock water developments in more locations in MT than ever before. This has allowed livestock to utilize forage resources that were not used in the past because of their distance from water. It is likely that herbage production and residual cover will be reduced in areas influenced by new water

development and that such factors could have significant individual and cumulative effects on productivity of sage grouse,

✓Livestock grazing allotments will need to be disclosed and displayed on maps and the analysis will need to identify the conflicts of such use with wildlife needs and the effects on riparian zones and fisheries,

✓The goals, S&Gs. and procedures developed during the RMP process for livestock grazing and issues which affect livestock grazing will be critical to the continued economic and practical viability of the livestock industry in southwest Montana,

✓When will be BLM/DFO review for adoption the NRCS and MT DSL grazing standards to ensure consistency,

✓Grazing allotments not under rest rotation grazing plans need to get that way,

✓How will the BLM/DFO implement livestock grazing necessary to improve range health in “brittle environments”?

✓cattle grazing should not encroach on elk habitat and elk range,

✓What will the BLM/DFO do to meet its contractual obligations to permittees while recovering endangered species?

✓We question BLM’s authority (Dillon) to convert a cattle AUM = TO 1 BISON AUM. Bison consume more forage in addition to continuous livestock grazing ---- the worst type of grazing,

✓We support rest-rotation grazing (Hormay 1961) but BLM doesn’t. Why not?

✓We request a RMA-wide grazing analysis which identifies range condition, stocking rates and that the RMP process address the issue of grazing suitability . . . . ,

✓Livestock management to protect soil and water values must also be considered. Management plans can be prepared that will meet these resource needs while permitting grazing,

✓There is no scientific proof that grazing has anything to do with sage grouse decline.

## **VEGETATION**

Comments on vegetation include: general, weeds, forest health, and rangeland health,

**General** comments on vegetation include:

✓Please develop a vegetation map of the project area highlighting the presence of key native plant species and exotic species. Some of our suggestions are. . . . (letter 166 includes an extensive list),

✓Past disturbances such as grazing allotment, sagebrush control are issues,

Comments on **weeds** include:

✓Re EO 13112 (Invasive Species) Defenders believes BLM should consider whether it is simply more effective and efficient, ecologically and economically, to simply avoid certain ground-disturbing activities so as to ensure this requirement is complied with. For example, not building certain roads or authorizing certain oil and gas drilling activities may be a very cost effective as well as ecologically effective, means to prevent the spread of invasives, and the plan should establish guidance as to when avoidance

of ground-disturbing activities is preferred or appropriate. Similarly, the effect on invasive species of ground disturbance resulting from rangeland management actions, including grazing itself, should be fully considered, and again the plan should establish guidance as to when these activities may be inappropriate due to invasive species considerations,

✓ Consider noxious weed management as a separate issue. Many forethinking resource professionals see this as a great threat to biodiversity on all lands within southwest Montana lands.

✓ Spread and control of weeds is an issue,

✓ Exotic weeds/noxious weeds is an issue,

✓ Sagebrush control is an issue,

✓ EPA comments on noxious weeds and pesticides (letter 155, pages 33-34)

✓ The biggest problem on all public grounds is weeds. There is not enough effort being used to get these under control. Lands being classified as wilderness, wild and scenic rivers, and ACECs just make it a lot harder to get weeds under control,

✓ BLM should take the lead from private landowners in the Centennial Valley and establish an area wide plan for fighting establishment of exotic weeds, and to also restore areas that have been infested with exotic weed species,

✓ The DFO RMP must address how the BLM intends to manage current noxious weed populations and ensure that future management activities will not lead to the spread or introduction of invasive species,

✓ Noxious weeds are a particularly bad problem on BLM land and private land in Alder Gulch,

✓ BLM participated in the development of the MT Weed Management Plan. The 2001 plan will not succeed without the immediate and complete cooperation of federal land management agencies. The goals of the plan are to (a) protect areas that are currently not infested with weeds (b) contain and reduce established weed populations and prevent spread to uninfested areas (c) restore, establish and/or maintain healthy native plant communities. The action plan for succeeding in the goals is to prevent transportation of seeds by motor vehicles by keeping all site disturbing vehicles on roads and trails. . . . .

Comments on **forest health** include;

✓ Conifers growing along stream banks limit the potential for other stream bank holding plants to establish or maintain the bank. Encroachment of the conifers has also reduced the size of riparian areas by out competing grass for nutrients & water and by lowering the water table due to large demands for water. This monoculture that has been created by mistake thru good intentions has not met the goals of public land which is to provide for multiple use of those lands. While the heavy forested areas provide concealment for large & small game animals, they are providing less of a food source—thus adversely affecting the diversity of plants & animals that the majority of the public wants,

✓ Old growth habitats should be mapped and delineated by species. The effects of past harvesting, roading and grazing on habitat fragmentation will also need to be addressed and analyzed,

✓ Sustainable Forestry: BLM parcels upstream from Pony include Douglas fir-lodgepole forests that are unnaturally thick and primed for a massive and damaging wildfire. We definitely do not want roads or clear-cut logging of these parcels, but selective thinning would help give balance to these forest lands.

I would like to see a program of long-term, sustainable forestry, removing just enough mature trees each year (from BLM and Forest Service lands) to keep a local one or two person mill in business. Let me say (again) that there should be no new roads!

✓ During the past two decades, old growth has been established scientifically as a “unique forest resource with inherent value resulting from the ecological functions and composition of the forest” (Hayward, 1991). Areas of old forest (i.e. late successional old growth forest) are critical to maintaining ecosystem health within forest areas in the DRA. Remaining old growth forests serve as refugia for numerous obligate wildlife and aquatic species and for ecosystem processes. The DEF must inventory and analyze all old growth resources on BLM within the planning area, identify old growth stands and place them off limits for timber management. Recruitment old growth should be identified and protected in areas where old growth forests are not meeting historical levels. Inventories should be conducted through the FO, using scientific definitions for old growth stands. A few mature trees in a pole stand does not constitute an old growth forest; strict guidelines should be used to identify old growth stands and processes. Ground truthing must be utilized in the analysis.

Comments on **rangeland health** include:

✓ Rangeland health is an issue—I haven’t seen anything by Dillon’s rangeland management program in the RMP planning process,

✓ We need to maintain a viable range resource that will allow consistent livestock grazing & wildlife habitat and watershed protection; The above items can all be achieved with proper management; One item can be beneficial to the others,

✓ Managing vegetation---the trend towards reducing or eliminating cattle grazing is unhealthy for the long-term health of the resources. Rather, there should be more rest-rotation programs instituted, based on successful studies already in place,

✓ Desertification of BLM Rangelands: Having studied rangeland ecology for fifteen years, I can now visibly observe from year to year the process of desertification on local BLM parcels. These lands were historically seeded, fertilized and “rototilled” by massive herds of bison and other large herd animals, as documented in the accompanying paper I wrote, titled “The American Sahara.” Altering the sequence of grazing so that we no longer have massive herds trampling the soil has made it nearly impossible for new perennial grass seedlings to germinate. The result is bare ground, erosion, and invasion by cheat grass, mullein, knapweed and other noxious weeds. BLM parcels upstream from Pony are rapidly converting to cheat grass, which will result in a damaging fire cycle here in the near future. We have been lucky so far. To restore the health of these rangelands, we need to mimic the natural cycles of grazing that were present long before we were. Please include my attached paper as documentation. See paper “The American Sahara” (documentation of rangeland desertification),

✓ Current moose, antelope, deer & elk numbers and their affect on sagebrush ecosystems, upland range, and on riparian areas & water quality,

- ✓A key objective of the RMP/EIS should be maintenance of the sage brush-steppe ecosystem so that important ecosystem functions continue. The bottom line of the RMP/EIS should be to ensure that soil stability, watershed health, and ground cover all are within ranges that promote sound ecosystem function. The plan must address how the emergency fire rehabilitation strategies will impact this bottom line. If these parameters are met, then wildlife habitats will be protected and uses such as livestock grazing can be accommodated,
- ✓Preservation of the sagebrush habitat types and their values - this conflicts with many prescribed burn policies used today,
- ✓The RMP/EIS should include measures to improve the likelihood of persistence of sage grouse and other species dependent on sagebrush and rangeland habitats. Actions clearly are needed to ensure that there will not be a need in the future to list sage grouse or other sagebrush dependent species in Idaho as threatened or endangered and, more broadly, to ensure these species and their habitats are conserved and restored..
- ✓We see no connection with the recent sage grouse-fence issue and this issue is not supported by any research information and has nothing to do with our position on high-tensile bison fence,
- ✓Managing vegetation, especially sagebrush-steppe habitats. Traditional agriculture practices can benefit sagebrush-steppe habitats. Supporting continued agriculture usage, especially that of the livestock industry, should be a top priority and should be recognized for it's continuing contribution to the local economy. Also, increased vegetation use through additional AUMs could be beneficial to the environment and should be considered when scientifically supported,
- ✓Sagebrush habitat should not be degraded by overgrazing by cattle,
- ✓Livestock and Fire Management or Protection Needed---Livestock grazing use in association with wild and prescribed fire management in sagebrush-steppe-riparian habitats is a significant cause of sage grouse habitat degradation. Since 95% of the DRA is currently grazed by domestic livestock, including all of the proposed ACECs, livestock suitability is one of the key factors that must be addressed and changed under the ACEC designation. As well, Holechek 1999 in an extensive review of grazing literature determined conventional wisdom suggesting 50% use by livestock is appropriate actually leads to range deterioration in semi-arid grasslands. Most of the DRA is grazed at or above this level of utilization,
- ✓We would appreciate the RMP to identify rangeland areas that will be rested throughout the RMP planning cycle, a minimum of 10 years, in order to understand the differences between grazed and non-grazed land, and to provide wildlife areas where they don't have to compete with livestock. This should be of sufficient scale and ecological significance as to measure non-grazing's effects on important wildlife and water resources and to make a difference for wildlife in key areas,
- ✓Examine current moose, antelope, deer and elk numbers and their effect on sage brush ecosystems, upland range,
- ✓See also Availability & Management of Public Lands for Commercial Use, Grazing.

## **WATERSHED MANAGEMENT**

Watershed management comments include: issues, water quality, riparian and fisheries, and other detailed comments..

Some of the comments simply **identified issues**:

- ✓water,
- ✓watershed protection and enhancement,
- ✓overgrazing and damage to streams and lakes nearby,
- ✓water quality,
- ✓water quality–improve by sampling to remove impaired streams from TMDL list,
- ✓water quality and compliance with state laws and regulations,
- ✓riparian values and grazing.,
- ✓watershed integrity.

Comments on **water quality** include:

✓The purpose of water quality standards is to protect aquatic ecosystems, and BLM must ensure this comprehensive objective is met by ensuring water quality standards are complied with. Water quality standards are typically composed of numeric standards, narrative standards, designated use, and the antidegradation policy. All too often, however, only numeric standards are viewed as “water quality standards.” That narrow view is incorrect. The Supreme Court held in PUD No. 1 of Jefferson County v. Washington Dept of Ecology, 511 U.S. 700 (1994), that all components of water quality standards are enforceable limits. Consequently, in our view, BLM’s land use plan must ensure all components of state water quality standards are met, not just numeric standards. . . . Designated uses of this sort (i.e. protection for cold water species of game fish and the cold water aquatic life, including necessary organisms in their food chain) encompass a far more holistic, ecosystem-based view than focusing on, say, the concentration of chlorine in the stream (a numeric standard). Consequently, the plan should provide that designated uses be achieved, and if they are not, require prompt management changes even if numeric standards are otherwise being met. . . .

The State’s antidegradation policy is also a critical component of water quality standards,. Of particular significance are Outstanding National Resource waters, where water quality must be maintained and protected.. . . .In addition to ensuring that the existing standards and guidelines are met, the plan should also consider whether there is a need to amend existing standards and guidelines.

At a minimum, BLM should consider whether the statewide or other broad-based standards and guidelines currently in place need to be modified to meet local conditions.

✓Defenders of Wildlife believes it is imperative that BLM insure that waters on its lands comply with state water quality standards.

✓BLM cannot simply claim that BMPs are being used and therefore water quality is being protected. The effectiveness of BMPs can only be determined through water

quality monitoring. Rangeland Reform regulations require the BLM to be more vigilant in protecting and improving water quality,

✓ Consider that BLM often manages land adjacent to high quality waters. BLM, through its management practices, is in the position to protect and “restore boundary” to watersheds on BLM lands that will have a much greater impact to improving the watershed integrity,

✓ The AIA process developed by researchers at U MT’s Flathead Lake Biological Station indicates there is a mix of different quality waters for BLM lands in Beaverhead and Madison counties. This could be used to guide RMP management decisions and planning,

✓ Regarding water quantity and quality—what type of monitoring plan does BLM have in place and how will it be improved? Livestock use of BLM lands is currently degrading water quality in many places and also decreasing water quality available for plants and wildlife. How will BLM mitigate or change this situation?,

✓ Perhaps the greatest problem for BLM to consider water quality will be a lack of data. The DFO lists 46 streams and includes narrative comments that in nearly all cases indicate that water quality has not been monitored in the past 20 years. As a result BLM is in a position neither to identify the status of its waters’ quality nor to determine how best to manage it. Absent relevant and representative data, even BMPs are suspect, because without understanding water quality it is difficult if not impossible to know whether or not BMPs will adequately protect water quality,

✓ BLM must also develop an expanded monitoring plan—this plan must expand on other agencies’ and individuals’ monitoring efforts to insure that no data gaps exist on BLM lands,

✓ Need to look at current moose, antelope, deer and elk numbers and their effect on riparian areas and water quality,

✓ Water management and associated water quality will be significantly impacted by BLM actions under the RMP. Water quality can be degraded by many activities but the most common sources for the Red Rock, Beaverhead, Ruby and Big Hole Rivers that encompass most of the Dillon area watershed is agriculture, especially rangeland use. Enclosed are portions of three documents that define the extent of the nonpoint source water pollution that is the responsibility of the BLM,

✓ Between 1998 and 2000, the DEQ moved several FO waters from “waterbodies in need of TMDL” to “Waters to be monitored and reassessed”. What happened here?

✓ Need to look at current moose, antelope, deer & elk numbers and their effect on riparian areas and water quality.

Comments on **riparian and fisheries** include:

✓ The analysis of riparian areas and fisheries habitat will need to identify the existing sedimentation levels, road densities, culverts and crossings that may affect management parameters,

✓ Consider wetlands and other lentic riparian habitats in the management of riparian resources—thus far BLM has not included wetland health in their riparian inventories,

✓ In its water and fisheries analysis, the BLM should identify key streams for which it will develop plans to restore the fishery and adjacent habitat,

✓Watershed management, particularly regarding water quality, fishery values and riparian areas---the guide that should be used by leaseholders when addressing water issues should be by voluntary BMPs.

This helps to ensure that unfunded mandates will not hamper users or hurt the rural economy,

✓We need to protect Axolotl Lakes –this special fishery must have catch and release, barbless hooks, and artificial lures or flies only on all lakes in this chain,.

✓The Madison River should be catch and release. It could become one of the best fisheries in the world,

✓The Upper Big Horn should be managed as catch and release,

✓Need to look at current moose, antelope, deer & elk numbers and their effect on riparian areas and water quality.

✓I am appalled that people are catching cutthroats in Axolotl Lakes with worms and marshmallows.,

✓More data from American Wildlands on westslope cutthroat trout will be available in the near future.

**Other detailed comments** include:

✓Under the Clean Water Action Plan, federal agencies must adopt a policy that “will ensure a watershed approach to federal land and resource management that emphasizes assessing the function and condition of watersheds, incorporating watershed goals in planning, enhancing pollution prevention, monitoring and restoring watersheds, recognizing waters of exceptional value, and expanding collaboration with other agencies, states, tribes, and communities.” . . . . Implicit in this requirement is a prohibition on creating, or permitting, additional roads that could become problem roads, especially where there is no realistic basis given budget and personnel constraints to believe they can be adequately maintained. Relative to riparian areas, the Clean Water Action Plan requires that BLM “will enhance the quality of streams and riparian zones and accelerate restoration.” . . . . The BLM must ensure compliance with these mandates in its plan. . . . .One way these mandates are to be met is through requirements to ensure the processes for permitting and other use authorizations are revised and upgraded to ensure water quality is protected, and to amend use authorizations to meet water quality requirements by 2005. Id. Consequently, the plan must make specific and binding provisions for revising and updating livestock grazing permits and allotment management plans to ensure compliance with this provision. Likewise, authorizations for oil, gas, and coal development must ensure compliance with all provisions of the Clean Water Action Plan. The Clean Water Action Plan also establishes a goal of a net increase in wetlands of 100,000 acres per year, and therefore BLM should ensure that its plan allows for not net loss of wetlands, and steps should be taken in the plan to increase the acreage of wetlands. Somewhat similarly, the plan should make provision for implementing BLM’s Riparian-Wetland Initiative, and seek to implement the specific objectives established in that initiative on the Dillon Field Office, particularly the objective of restoring 75% of riparian areas to “proper functioning condition.”

✓MDEQ is under a court ordered schedule to prepare TDMLs (letter 155),

- ✓Detailed comments on drinking water/ground water from EPA (letter 155),
- ✓References for developing a good aquatic monitoring program from EPA (letter 155),
- ✓Comments from EPA on wetlands and riparian areas (letter 155),
- ✓Comments from EPA on water quality (letter 155),
- ✓American Wildlands is specially enthusiastic to help the RMP process by working with BLM to utilize the results from our computer model designed to spatially assess aquatic integrity. BLM can use the data and maps created in this process to identify high quality watersheds needing protection and lower quality watersheds needing restoration/remediation,
- ✓How will the BLM/DFO work with the BOR and Army Corp to maintain irrigated habitat?
- ✓Enclosed are portions of three documents that define the extent of nonpoint source water pollution that is the responsibility of BLM,
- ✓We recommend the BLM contact the MT Natural Heritage Program to learn about its current effort to identify and evaluate high quality wetlands in the Madison and Centennial Valley portion of the Red Rock River watershed (letter 155),
- ✓Website for Montana's Regional Guidebooks for HGM Wetland Functional Assessment (letter 155),
- ✓American Wildlands is enthusiastic to help the RMP process by working with BLM to utilize results from our computer model designed to spatially assess aquatic integrity. AWL has a fully developed GIS lab and is completing an Aquatic Integrity Areas analysis that will geographically identify high quality watersheds. We encourage BLM to utilize the data and maps created in this process to identify high quality watersheds needing protection and lower quality watersheds needing restoration/remediation.

## ***TRAVEL MANAGEMENT/ RECREATION***

Travel management/recreation topics include: issues, access, off-highway vehicle use, effects of OHV/Motorized travel on other resources, enforcing OHV regulations, area specific comments and other comments.

Some comments simply indicated the following topics were **issues**:

- ✓Travel management,
- ✓OHV management,
- ✓Access for hunting opportunities,
- ✓Availability and management of public lands for recreational uses (to be added to Issue 6),
- ✓ Viewshed protection (land seen from downtown Virginia City Historic District).

Specific comments on **access** include:

- ✓Concern about loss of hunting and fishing access,
- ✓Maintaining or increasing public access to BLM lands,
- ✓Concern about trading any BLM parcels that allow public access to any public land,

- ✓ Leave established roads accessible to 4 wheel travel and take down road closures (from 85 year old man unable to walk very far),
- ✓ Clearly mark all public land boundaries,
- ✓ The permit holder or lessee of public lands should always be informed of persons seeking entry to them while they are being used for agricultural purposes,
- ✓ Easements for access roads should be considered to foster multiple use and economic growth when appropriate and feasible,
- ✓ No new roads (in a forestry context).

Specific comments on **off-highway vehicle use** include:

- ✓ Off-road vehicles (ORVs) should not be permitted in Wilderness Study Areas (WSAs) or other wilderness-quality lands, the plan should make provisions to monitor ORV use and enforce this restriction . . . Given these legal mandates, BLM should clearly lay out the strategy by which the BLM will begin protecting its lands from inappropriate ORV use, including implementing a policy that ORVs are permitted only on designated routes that are signed “open to ORV use.” ORVs should be required to remain on designated routes, and the routes should be clearly signed as open to ORV use. Otherwise, ORV use should be prohibited, and the plan should make provision to monitor and enforce these requirements,
- ✓ Restrict all OHV use to officially designated roads and trails,
- ✓ Use scientific information to make decisions, not what people think when you are closing down areas to motorized access,
- ✓ Access for motorized recreation needs to stay the same; If you close cross country travel, do not close any trails & reopen closed trails; This would help keep cross country violators at a minimum
- ✓ I support limited motorized use on designated trails only and stronger enforcement on those who insist on riding off trails. Planning Criteria should maintain a fine line of access to BLM land without all the roads and four wheeler trails through BLM land,
- ✓ Other OHV criteria --- route length, terrain challenge, vehicle mix --- on my 2-wheeler I don't want or need a high standard road to be my only choice! It's OK for a few miles if it gets me to something else,
- ✓ I am not satisfied that OHV management will not still be treated as a side-bar to other management issues---Planning Criteria: Suggest develop specific to OHV recreation concerning developed & undeveloped camping, staging areas, routes that provide satisfactory experiences for 2 wheeled, ATV & conventional 4X4 use including seasonal changes. Need to evaluate what's being used now & to what extent - what are the problems - how to mitigate other than closure,
- ✓ All motorized travel should be treated the same; if a road is restricted to pickup trucks, it should be restricted to ATVs and motorcycles,
- ✓ ATV use must be controlled to protect resources--enforcement must be used,
- ✓ OHV use has greatly increased over the past decade and will need to be fully addressed in the RMP analysis--consider restricting OHVs to existing open roads and prohibit their use on trails--OHV use will be a significant issue in the next decade and the RMP should anticipate what managerial actions will be necessary to reduce the potential for future controversy,

- ✓ Specifically consider the effects of motorized travel, ORV use and other means of travel on wildlife, vegetation and other values,
  - ✓ Minimize excessive regulations but control non-leaseholder vehicular travel for erosion and weed control and security of improvements,
  - ✓ "Trails Closed Unless Open" should apply to hikers and horseback,
  - ✓ Off-road vehicle travel (4x4, ATV, cycle, etc.) represents the most critical management need for public land management agencies. No one could have predicted the rate that this use has increased, or the damage to our natural resources that is occurring. They have a strong foothold that is increasing every day so the job is not going to be easy. Enforcement will be even more difficult. The public will help if we can get something like more easily read registration numbers on ATVs,
  - ✓ Vehicle Management needs to consider the following:
    - A. Noxious Weeds
    - B. Wilderness Study Area
    - C. Areas Released from Wilderness Consideration
    - D. Roads and Trails
    - E. Enforcement
- Consider that with each passing year the vehicles are more powerful, more technically advanced, and that these new machines are much easier to use which has led to increased use and more resource damage.

The following comments on the **effects of OHV/motorized travel on other resources** were received:

- ✓ OHV use results in the spread of noxious weeds, adversely impacts wildlife security areas, causes widening of existing trails and significantly impacts non-motorized users. Motorized use on trails causes displacement of non-motorized users and leads to greatly increased user conflicts,
- ✓ If any of the alternatives involve modifications to the area's travel management plan that identifies designated routes available for motorized vehicle use, EPA recommends that the plan includes appropriate limitations and restrictions on motorized vehicle use to protect against erosion, transport of sediment to streams, and degradation of aquatic habitat by off-road vehicle use in wetlands and other environmentally valuable areas. The EPA is also concerned about the increasing use of off-road vehicles and all terrain vehicles that occurs away from roads and trails. . . . (letter 155),
- ✓ The presence of excessive motorized routes, and associated use, has major impacts on many biological resources. From water quality and fisheries to grizzly bears and lynx, the presence of too many, or poorly placed motorized routes, can determine species occupancy in a given area. For the RMP process, the Dillon Resource Management Area should be surveyed for all system and non-system motorized routes and map them for the RMP process. The BLM should use this information to establish a motorized route restoration program, which will prioritize obliteration and closure of poorly constructed or pioneered motorized routes, areas with road-sensitive species occupancy, areas of high road density and areas with sensitive fisheries,
- ✓ Need to look at the effects of vehicle management on noxious weeds, WSAs, areas released from wilderness consideration, roads and trails, and enforcement .

Comments on **enforcing OHV regulations** include:

- ✓Off-road travel management needs to have some teeth—the abuse of public lands by 4 wheelers and pickups is basically unrestricted and creates severe problems (fire hazards, ruts and spread of noxious weeds)— need to consider some type of permit for accountability and to help offset increased management costs,
- ✓An effective policing and enforcement program is needed to assure that motorized access does not occur in restricted areas,
- ✓If you don't want people driving all over—enforce your rules. As it is, only law-abiding people follow them,
- ✓Public land agencies must get teeth in their regulations and be diligent and forceful in enforcement of road closures. Don't close a road unless it honestly makes sense,
- ✓Enforcement will be even more difficult. The public will help if we can get something like more easily read registration numbers on ATVs.

The following **area specific comments** were received:

- ✓Motorized violations in the Centennials are an issue,
- ✓The point-of-Rocks fishing access along the Jefferson River has become a party spot/trashed due to the development of the hot springs there. An out-house and other camp infrastructure would be a big help. Vandal management needs to be addressed there,
- ✓Would like to see the BLM pressure the Beaverhead NFS to close its portion of the Centennials (Hell Roaring Drainage) to snowmobiles, bringing it in line with the rest of the range in Montana,
- ✓Small area of Beaverhead NF still open to sleds in winter is an issue,
- ✓The Continental Divide National Scenic Trail is to be a primitive and challenging foot and horse trail. Motorized vehicles on this trail would fundamentally undermine its primitive and challenging character and purpose and must be prohibited,
- ✓In reference to the off-road non-restricted travel plan on the Revenue Flats in Madison County—Why do we have to let everyone have access to our private ground? These pieces should be sold to the landowners. People are causing weed problems and erosion,
- ✓Axolotl Lakes and Upper Big Horns need to be managed as catch and release trophy trout lakes so that all ages can have the thrill of catching larger trout frequently.

**Other comments** include:

- ✓Consider appropriate justified controls on commercial guiding on rivers within BLM area---i.e. use of BLM access,
- ✓Concentrate on keeping new development to a minimum while allowing for existing commercial recreational use to remain,
- ✓The management plan should discuss the effects that enhanced management and regulation would have on recreation. If proposed management strategies would result in increased public use, the management plan should specifically describe the anticipated effects on project area resources. The management plan should identify the types and extent of recreational impacts and anticipated mitigation measure

necessary to minimize these impacts to ensure resource protection. (letter 155),  
✓"Trails Closed Unless Open" should apply to hikers and horseback riders as those trails were not constructed with significant public involvement or NEPA analysis, and to allow their continued use legitimizes the non-NEPA compliant process that created the trails.

✓It is important to recognize that oil and gas exploration and development activities are fully compatible with semi-primitive recreational values and opportunities—the oil and gas industry has demonstrated repeatedly its ability to operate in sensitive areas with minimum effects on other resource values. . . I would strongly object to a no-lease or no-surface occupancy stipulation decision for areas allocated to semi-primitive recreation.

## ***SOCIAL, HISTORICAL AND CULTURAL COMMENTS***

Social, historical and cultural comments include: historical concerns, equity and fairness, cultural issues, and other comments.

**Historical concerns** include:

✓Preservation of the historic 1860s Bozeman Trail.

Comments/questions about **equity and fairness** include:

✓Consider the affects on Social Equity as a result of decisions base on the issues. By this I am asking how will decisions affect all citizens of southwest Montana that belong to separate socio-economic classes; particularly those who are supporting families on incomes that are below the US National mean and below US National poverty economic levels. Please consider the standard of living in southwest Montana areas during several time periods; for example, after the passage of the Taylor Grazing Act, pre- and post-WWII, after completion of Clark Canyon Reservoir and the East Bench Irrigation Project, etc. Also consider the proportion of the local mean annual incomes that were and currently are derived from commercial activities on public lands within the MT BLM DFO planning area.,

✓How can the BLM/DFO give resources of great value away to one minority group and charge another minority for resources?

✓What will the BLM/DFO do to deal with the perception on some parts of the public that certain minorities are being "cleansed" from the rural areas and/or the west?

✓How will the BLM/DFO implement a policy of fair treatment? Fair treatment means that no group of people, including a racial, ethnic, or socio-economic group, should bear a disproportionate share of the negative consequences resulting from the execution of federal, state, local, and tribal programs and policies,

✓What can the BLM/DFO do to reverse the discrimination against minorities and ensure any disaffected minorities can effectively participate in the BLM/DFO processes?

✓Is the BLM/DFO discriminating against certain minorities based on race, ethnicity or socio-economic status?

✓EPA comments on Environmental Justice (letter 155, page 36).

Comments/questions about **cultural issues** include:

✓What mechanisms will the BLM/DFO put in place to gauge the cumulative effects of its actions on the culture, custom and economy of Beaverhead County? (i.e., in grazing allotments, the reduction of a few hundred AUMs on a single allotment is not considered to significantly impact the custom, culture and economies of the surrounding communities),

✓How will the BLM/DFO protect the custom, culture and economy of Beaverhead County while recovering endangered species?

✓Consider Cultural and Heritage Resources and Values. By this I mean White-European culture during the last 200 years in addition to Native American culture over the previous 12000 years,

✓I understand that you and your staff will be coordinating goals, objectives, and guidelines for resource management for the land in Beaverhead and Madison County in southwest Montana. The Confederated Salish and Kootenai Tribes have historical and cultural interests in the above mentioned land and would like to work with you and your staff in the development of the Resource Management Plan,

✓One issue that should be considered is how will this plan affect treaty rights and tribal interests, not only of the Shoshone-Bannock people but other tribes with interests in the proposed area

✓EPA comments on Tribal Trust Responsibility (letter 155, page 36).

**Other comments** include:

✓The Planning Board is concerned about BLM lands close to Virginia City Historic area and surrounding entry corridors. It's important to preserve the integrity/health of this area,

✓Control of "sprawl" development beyond Virginia City limits,

✓How are trends in human well-being and environmental quality interlinked?

## ***FIRE***

Fire comments include: issues, general comments/questions, fire rehabilitation, and area specific comments.

Some comments simply indicated the following to be **issues**:

✓fire management,

✓fire control and management on BLM land adjacent to Virginia City,

✓restoration of fire to BLM lands,

✓prescribed burns.

**General comments/questions** include:

✓What can the BLM/DFO do to reduce the chance of catastrophic, uncontrollable wildfire?

- ✓BLM/FS coordination and consideration of each agency's proposals and identified use of the resources is needed--- reference to BLM Mussingbrod fire kill timber sale,
- ✓How will the managed risk of catastrophic wildfire affect air quality, human health, tourism, other commercial uses, and public access?
- ✓The RMP should include an analysis of the restoration of fire to BLM lands. This should include identification of areas which (a) will allow prescribed natural burn (b) areas where the BLM will prescribe its own burning policy and (c) areas where suppressions will be employed with appropriate social and ecological justification,
- ✓Beaverhead National Forest has a class 10 fire rating, the highest. This rating also means much of the Beaverhead National Forest and co-adjacent landowners, including the BLM/DFO, will experience severe wildfires during the lifetime of the new RMP. Beaverhead County is concerned that resources will be diverted from the implementation and monitoring workload of the RMP to fire fighting. As the fire danger is known, Beaverhead County believes a necessary part of the RMP is to develop a mechanism to meet the dual requirements of implementing, managing and monitoring the new RMP and effectively controlling wildfires. To create an RMP that would allow the diversion of management resources to fire fighting when the fire danger is known would not be effective planning,
- ✓We would recommend against the RMP incorporating decisions resulting from the Statewide Fire management Plan amendment (2001) unless those decisions result from preparation of a full, statewide EIS, which adequately analyzes the cumulative impacts of the decision. The RMP must do this cumulative analysis if the analysis is not forthcoming from the statewide plan amendment, This analysis should incorporate the best available science on fire management and prescriptions in the context of wildlife species,
- ✓the RMP/EIS must be explicit in the criteria to be used to decide when and where prescribed fire will be used—if prescribed fire is used to manage wildfires, then it is important that guidelines for other land use activities such as livestock grazing be specified in the immediate time frames following the prescribed fire.

Comments concerning the effect of **fire rehabilitation** include:

- ✓BLM should be careful in constructing the policy for fire rehabilitation with regard to critical wildlife habitats. There are many opinions and ideas on how best to approach this complex problem. What is beneficial to a particular wildlife species may not be beneficial to another species. It is important that enough flexibility is built into the plan to address these concerns. In other words, one plan may not fit all situations,
- ✓Mule deer is declining across much of its range. BLM should consider the impacts of emergency fire rehabilitation plans on mule deer habitat which require substantial shrub components in their habitats—timing, size and configurations of prescribed burns are important considerations for mule deer. Rehabilitation of wild fire sites is also critical to mule deer, in that shrubs must be brought back into the habitat as soon as possible,
- ✓The plan must address how emergency fire rehabilitation strategies will impact the maintenance of the sagebrush-steppe ecosystem.

**Area specific comments** include:

- ✓What actions will BLM/DFO take to reduce the danger of uncontrollable wildfires in Beaverhead County and how will these actions be coordinated with other agencies and private landowners?
- ✓BLM parcels upstream from Pony include Douglas fir lodgepole forests that are unnaturally thin and primed for a massive and damaging wildfire. We definitely do not want roads for clear-cut logging of these parcels, but selective thinning would help give balance to these forest lands.

## ***LAND TENURE ADJUSTMENT***

Land tenure adjustment comments include general and area specific comments.

**General comments** include:

- ✓Do not trade BLM parcels that allow public access to any public land!
- ✓Against disposal of environmental sites and areas but judicious sales to get back what shouldn't have been privatized,
- ✓Address the consolidation of public tracts and set a process for land exchanges that doesn't take decades to accomplish. Right now everything is on hold and interested landowners are put off. Often proposed exchanges or buyouts are beneficial to the public and landowner both, but it seems to never happen,
- ✓Oppose disposal of environmental sites & areas; but, judicious sales to get back what shouldn't have been privatized,
- ✓All actions under tenure adjustments should ensure that both parties involved are willing participants and that the land exchange is of greater or equal value with in the area involved,
- ✓BLM should prioritize lands that would be beneficial to acquire and lands that if they were disposed of would have little impact. BLM should also look at the Rawlins Field Office's (Wyoming BLM) Land Exchange Criteria that was created for the Great Divide RMP----good example of how to prioritize lands for both acquisition and disposal,
- ✓BLM should utilize American Wildlands' Corridors of Life mapping to help you to determine where wildlife migration corridors are in the analysis area. These area critical lands to keep in public ownership,
- ✓There should be no lands within ACECs traded away. While FLPMA may not preclude the trading away of these lands, the RMP can prohibit this and we encourage you to on the basis that ACEC designation indicates that there is something particularly unique about the land and should be kept in public ownership,
- ✓BLM should keep any lands that have a common boundary with a National Forest,
- ✓Do not dispose of any lands that are within a WSA boundary,
- ✓BLM should be as specific as possible about what lands are being placed in the disposal category,
- ✓When the RMP outlines protocols for dealing with disposed lands, BLM should consider the use of conservation easements and other protective covenants. If the

BLM identifies lands to dispose of that possess valuable public resources, BLM should utilize this as a way to continue protection,

✓The Handbook fails to give any explicit criteria that should be utilized when determining which lands to pursue acquisition of---American Wildlands' list of lands which are of a high priority to acquire include (a) old growth (b) native fish habitat (c) unroaded lands (d) wetlands (e) T&E species habitat (f) lands within or next to WSAs or ACECs. Lands of a low priority are those that have been managed poorly by private landowners and have soil health problems, noxious weeds, high road density and other impacts that would require immediate expenditure of funds to restore.

✓American Wildlands advocates for changing boundaries of WSAs if lands adjacent to WSAs are acquired.

**Area specific comments** on land tenure adjustment include:

✓Gravelly-Tobacco Roots Wildlife Corridor--- BLM lands are critical to linking wildlife habitat between the Gravelly and Tobacco Roots Mountains---- these lands need to be managed for wildlife and an emphasis should be placed on consolidating public land ownership there, ideally by selling or trading isolated BLM parcels elsewhere in exchange for private lands in the corridor,

✓Regarding the off road non-restricted travel plan on the Revenue Flats Madison County--- Why do we have to let everyone have access to our private ground because it is non- restricted area? These pieces should be sold to landowner. People are causing weed problems & erosion,

✓Consideration of BLM land swaps to facilitate the alleviation of some of the concerns about Virginia City,

✓The plan should identify potential land tenure adjustments (acquisitions of easements or fee, disposals, transfers) that might be undertaken on a willing-seller basis. An example is the area within the viewshed of Lemhi Pass--particularly Sections 10, 15, 21, and 22 of T 10 S, R 15 W. In addition to the historic heritage and scenic values associated with this area, Section 21 would lend itself to relocation of the Continental Divide National Scenic Trail off the existing motorized travelway.

## ***ECONOMICS***

Economics comments include general questions and economic concerns.

Some comments asked **general questions**:

✓What are the "best practices" for the preparation of an economic analysis or cost-benefit analysis?

✓How useful are willingness-to-pay values in economic analysis?

✓How will the BLM/DFO prepare economic analysis that "represent the real world" on the ground choices and their effects accurately?

✓How will the BLM/DFO prepare unbiased, economically balanced and acute economic analyses?

✓How will socio-economic considerations and benefits from oil and gas activities be addressed in the DEIS?.

Some comments presented **economic concerns**:

✓#1 should be concern for economics and the present tax base on the local level,

✓Economic effect of any further restrictions on oil & gas leasing and mining,

✓Need realistic economic alternatives—insights made from economic analysis should be valid—economically feasible and technologically reasonable. Land use alternatives need to be documented possibilities, not preference utility values.

✓Of particular concern to livestock producers during the RMP scoping process has been BLM's focus on issues which have the potential to limit or restrict use of specific land areas. Any and all resource use related management decisions made by BLM must be based on scientific data, the principles of multiple use and sustained yield, the historic, present and potential uses of the land, together with an understanding and consideration for the degree of local dependence on the resources from public lands.

✓How will changes in commercial uses of BLM administered lands influence the viability and sustainability of private businesses—for example family operated ranches and what is the likely fate of undeveloped private lands if the economic viability of private property is reduced or eliminated?

✓Consider the proportion of the local mean annual incomes that were and currently are derived from commercial activities on public lands within the BLM/DFO planning area,

✓Consider the effects on social equity as a result of decisions based on the issues.

How will decisions affect all citizens of southwest MT that belong to separate socio-economic classes, particularly those who are supporting families on incomes that are below the US national mean and below US national poverty levels,

✓Multiple use needs to remain a top priority, as does economics—both from a community standpoint as well as the BLM's,

✓Consider the short and long term economic effects on local, state and regional economies as a result of decisions based on all issues. How will the exclusion, reduction or enhancement of each commercial land use affect our local, state and regional economy?

✓The economic considerations have to be broader than the obvious—grazing and the local ranching economy are obvious but the economics of hunting, tourism, and biodiversity must also be calculated in real terms. We all live in a dynamic and evolving economy. It is folly to continue to commit resources unfairly for any specific industry based on history. It is unjustly supporting one industry over another, the full price of economic and environmental damage is not being calculated, See also EPA's economic comments (letter 155).

## ***ECOSYSTEM MANAGEMENT (EM)/ BIODIVERSITY***

Ecosystem management/biodiversity comments include: questions about EM and other comments.

**Questions about EM** include:

- ✓Is EM appropriate for use as a guide for public policies, or does use of the concept interject uncertainty, imprecision and arbitrariness?
- ✓Are there better management paradigms available to the BLM/DFO than EM?
- ✓How does achieving short term goals result in the long-term destruction of habitat? (i.e. logging has been stopped to protect an eagle; instead a wildfire burns the forest destroying the eagles and their habitat),
- ✓Basically, the question was how the BLM DFO will define “natural” and “native” in the upcoming RMP and what was the process used to arrive at the definition of “natural” and/or native.” . . . .The decision to select any single time frame is made more difficult by plant community succession and plant migration and their implications that nature is not static but dynamic and always changing. . . . Maintaining a varied mosaic of plant succession communities providing a wide range of habitats is an important criteria in determining resource health. . . . As you are aware, Beaverhead County surfaced the concerns about megafauna extinctions, anthropogenic fire and plant migration and included these issues in our formal scoping comments. . . . Obviously, the County expects the RMP will include numerous references to “natural” and “native,” explaining our interest in how they were defined. Implicit given the County’s stated interest in a legally defensible RMP, is an overview of the due diligence inherent in the definition process to preclude a reviewing body from finding the process and/or definition to be arbitrary and capricious,
- ✓The scientific definition of a functioning ecosystem—important questions to ask are (a) what are functioning ecosystems, (b) if the current ecosystem is not a functioning ecosystem, specifically why it is not? Scientific methods should be used to come about these definitions and determinations so that they are not arbitrary and capricious,
- ✓How does the BLM/DFO define “natural” when nature is always changing?
- ✓As man has radically altered the natural environment through hunting and anthropogenic fire for the past 15,000 years, at what point in time does the BLM/DFO consider to be “natural”?

**Other comments** include:

- ✓Health of the resource is the most important—common sense and determining if the final solution is good for the local area and economically feasible,
- ✓A key objective of the RMP/EIS should be maintenance of the sagebrush-steppe ecosystem so that important ecosystem functions continue. The bottom line of the plan should be to ensure that soil stability, watershed health, and ground cover are all within ranges that promote sound ecosystem function. The plan must address how the emergency fire restoration strategies will impact the bottom line. If these parameters are met, then wildlife habitats will be protected and uses such as livestock grazing can be accommodated,
- ✓Resources should be managed to be more productive, not preserved. Theories that the resources will return to some perceived pristine condition if we don’t use them is so wrong,
- ✓Biodiversity may be a critical consideration for new projects, major construction, or when special habitats (wetlands, T&E species habitat) will be affected. The state of the

art for this issue is rapidly changing. . . . This document should address the diversity and uniqueness of flora and fauna that exists in the analysis area . . . the effects of the proposed alternative actions on the maintenance of diversity . . . the cumulative effects of past projects, proposed and approved future projects on diversity, stability, fragmentation, connectivity, adjacent landscapes, and disruption to processes or functions (letter 155),

✓Consider noxious weed management as a separate issue—many forethinking resource professionals see this as a great threat to biodiversity to all lands within southwest Montana lands.

✓Part and parcel of planning for maintaining biological diversity via ecosystem based management is a need to ensure that indirect and cumulative impacts of management actions are fully considered. The NEPA regulations provide guidance as to these concepts,

✓BLM has a duty to protect the diversity of all native wildlife on its lands by providing for ecosystem based management,

✓It is critical to note that biological diversity encompasses far more than just species diversity. Genetic diversity and the diversity of biological communities are also components of biological diversity. Consequently the plan should make provisions for maintaining these elements of diversity,

✓It may be impossible to fully protect biological diversity without considering landowners and landholdings “outside” of BLM’s holdings in the DFO. Therefore, Defenders requests that the plan consider and make provision for integrating, or at least recognizing and considering, other landholdings relative to BLM’s efforts to protect biological diversity

✓It is also critical to note that protecting biological diversity can only be dealt with appropriately at the planning level; it certainly cannot be dealt with appropriately or effectively at a project specific level. Fragmentation, connectivity and other similar principles from conservation biology are inherently landscape level considerations, not site specific. . . . The plan should establish specific, binding limits on road densities and other disturbances that cannot be exceeded in the planning area. This is the only way to ensure biological diversity is preserved, and that ecosystem attributes are not “nickle and dimed” to death by individually small but cumulatively significant site-specific projects.

## ***MULTIPLE USE***

Comments on multiple use include:

✓Resources should be managed for multiple use,

✓How will the DFO ensure mining remains one of many multiple uses?

✓Consider development of issues on other resources rather than place emphasis on single use recreation,

✓We have far exceeded the intent of wilderness acreage project multiple use,

✓How will the DFO ensure forest industries remains one of many multiple uses,

- ✓ Treat all permitted actions equally—man caused disturbance near creek has 100% protection of westslope trout while same area has grazing with cows in the creek,
- ✓ Of particular concern to livestock producers during the RMP scoping process has been BLM’s focus on issues which have the potential to limit or restrict use of specific land areas. All resource use related management decisions made by BLM must be based on scientific data, the principles of multiple use and sustained yield, the historic, present and potential uses of the land, together with an understanding and consideration for the degree of local dependence on the resources from public lands,
- ✓ There is too much thought given to preservation and not enough given to a balanced scheme,
- ✓ BLM is multiple use—why is there no mention of the “and protection for all” congressional created uses?,
- ✓ The BLM has a congressionally mandated multiple-use mission, which must be upheld and not compromised by the single-use land management objectives, promoted by certain interest groups,
- ✓ Multiple use of all lands is the most important issue and practice for all,
- ✓ Multiple use needs to remain a top priority, as does economics,—both from a community standpoint as well as the BLM’s,
- ✓ Be far sighted in your thinking, plan for multiple use,
- ✓ Side boards around each and every multiple use,
- ✓ Balance of uses—BLM needs to make sure that a particular resource use does not dominate the use or preservation side of the equation. For example, “wildlife is the dominate use wherever possible”. Wildlife has its place but not to the exclusion of all else. There are cows, forest products, minerals, etc., that have a place in the scope of things and course one should not forget recreation.

## **SOILS**

Both comments on soils were tied to restoration. One indicated a complete field survey of the condition of key resources including soils (as well as range, forests, fisheries, water quality, wildlife and plants) should be completed to enable BLM to set forth priority areas for restoration, based on resource condition, need and effective use of available resources. The other comment indicated reclamation of disturbed lands should be considered as a separate issue (including closed roads and trails, abandoned mines, open pits, overgrazed lands and stream//lake access, etc.).

## **AIR QUALITY**

One comment from the EPA indicated provisions for comprehensive air quality analysis procedures should be included in the management plan in the event that future projects will adversely affect air quality (letter 155). The other comment indicated air quality

should be a separate issue so the managed risk of the catastrophic wildlife as it affects air quality, human health, tourism, other commercial uses and public access can be assessed.

## **MISCELLANEOUS COMMENTS**

There were some **comments that did not fit into any other category**. These include:

- ✓ Beaverhead County is concerned that resources will be diverted from the implementation, managing and monitoring workload of the RMP to firefighting,
- ✓ Beaverhead County would suggest that an RMP that could be implemented and monitored with the current staff and budget levels would be appropriate. Everyone would like an increased budget, but these seldom materialize without an incremental increase in workloads. We believe this is an important consideration of any special designation or projects,
- ✓ Consider the affects on the recognition and availability of Strategic Resources as a result of decisions based on all issues. In other words, how will exclusion of resource exploration affect our knowledge of the existence and feasibility of development of Strategic Resources vital to National Defense?
- ✓ Consider the affects on the recognition and availability of Critical Resources as a result of decisions based on all Issues. In other words, how will exclusion of resource exploration effect our knowledge of the existence and feasibility of development of Critical Resources vital to transportation needs, commercial and residential heating, food and fiber needs, etc? How could this influence local and regional self-sufficiency in the event of a national economic or political crisis?
- ✓ Consider and compare the cost of implementation of decisions based on all issues. Compare these expected costs to expected annual BLM budgets,
- ✓ Under current funding levels, does the BLM/DFO have the ability to effectively administer the areas currently under special designations?
  
- ✓ Any management plan should consider the vertebrate paleontological resource. For a list & location of localities: Producing vertebrate fossils on public lands see the inventory developed by Nichols, R & Nonnaman D, 2000; ACECs: files at Dillon BLM Office,
- ✓ EPA comments on solid waste (letter 155, page 35),
- ✓ EPA comments on pollution prevention (letter 155, page 37),
- ✓ EPA comments on noise (letter 155, pages 34-35).