

**UPPER MISSOURI RIVER BREAKS
NATIONAL MONUMENT
RESOURCE MANAGEMENT PLAN
SCOPING COMMENT SUMMARY**



December 20, 2002

**Lewistown Field Office
Airport Road, P.O. Box 1160
Lewistown, Montana 59457**

Scoping Comment Summary

A Notice of Intent to prepare the resource management plan (RMP) for the Upper Missouri River Breaks National Monument was published in the Federal Register on April 24, 2002. This notice served as the beginning of BLM's formal scoping process for the Monument.

The notice was followed by news releases in April and June, updates to the public (mailing list) in May and June, a newsletter in June, and a newspaper-type handout in July. All of these information tools conveyed information about the planning process, scoping open houses, potential issues, and questions/answers about the Monument.

To provide ample opportunities for public participation across northcentral Montana, the BLM held 11 scoping open houses in the following locations in July and August 2002:

July 8	Winifred	July 17	Cleveland
July 9	Lewistown	July 18	Malta
July 10	Big Sandy	July 22	Hays
July 11	Fort Benton	August 5	Great Falls
July 15	Havre	August 6	Billings
July 16	Chinook		

Over 320 people attended these open houses and the public quickly began sending a total of 5,700 scoping comment letters and e-mails, of which 5,300 were submitted electronically. Ten identified form letters or organized campaign form letters resulted in 5,100 of the total scoping comments. Scoping comments came from all 50 states, Puerto Rico, five Canadian provinces, and several foreign countries. Some were as brief as a sentence or two; others were over 25 pages long. Some were form letters and others were original. Some offered substantive comments, while others conveyed a want or an opinion. They all indicated an interest in the management of public lands and resources.

The BLM considers scoping to be an open, long-term opportunity that does not end with the publication of this scoping report. Public comments will be accepted until the draft RMP is sent to the printer, although comments were most useful for this stage in the process if received by the end of August 2002.

All scoping comments, with the exception of duplicates or form letters, were distributed to the planning team in the BLM offices in Lewistown, Malta, Havre, Great Falls and Billings. All scoping comments were read and 1,766 specific comments were coded into 31 subject categories and 55 subcategories (see Table 1). These categories are guidance-based resource sections for an RMP, and the subcategories are based on the comments received. Most of the coded comment letters contained several specific comments covering various categories. All 1,766 specific comments were entered into a database and organized by category and subcategory for this comment summary.

Following are the 1,766 specific scoping comments by category and subcategory.

**Table 1. Upper Missouri River Breaks National Monument
RMP Scoping Report Codes**

Subject Category or Subcategory	Category No.	Subcategory No.	Page No.
Resources			
Resources - General	1000		1
Air Quality	1050		2
Cultural Resources	1100		2
Fish and Wildlife	1150		4
Wildlife Species		1151	4
Habitat		1152	9
Animal Damage Control		1153	13
Wildlife and Grazing		1154	13
Geology	1200		14
Paleontology	1250		14
Special Status Species (includes Animals, Fish, Plants)	1300		14
Species and Habitat Inventories		1301	15
Prairie Dog		1303	16
Sage Grouse		1304	18
Additional Threatened, Endangered and Sensitive Species		1305	19
Threatened, Endangered and Sensitive Species and Grazing		1306	20
Soil	1350		20
Vegetation/Native Plants	1400		20
Riparian		1401	22
Upland		1402	23
Noxious and Invasive Plants		1403	23
Visual Resources	1450		27
Water	1500		27
Resource Uses			
Resource Uses - General	2000		29
Forest Products	2050		30
Lands and Realty	2100		30
Public Access		2101	31
Access		2102	32
Utility and Communication Corridors		2103	33
Livestock Grazing	2150		33
Minerals	2200		42
Oil and Gas Activity		2210	42
Oil and Gas Resource Value and Monument Lands		2211	44
Oil and Gas Leasing within Monument		2212	44
Oil and Gas Lease Validity		2213	44
Oil and Gas Operations Management		2214	44
Oil and Gas Impacts within Monument		2215	44
Internal Oil and Gas Requirements		2216	46
Oil and Gas Lease Management		2217	47
Recreation	2250		48
Camping		2251	51
Floating		2252	54
Motorized Watercraft		2253	55
Outfitting		2254	63
Hunting		2255	64
User Fees		2256	65
Non-Motorized Trails		2257	68
Transportation	2300		68
Aircraft Landings		2310	68
Aircraft Overflights		2311	71
Roads (General)		2320	72
Roads (Upland)		2321	92
Roads (River Access)		2322	92
Fire			
Use and Suppression	3050		93
Rehabilitation		3051	93
Ecology and History	3100		93
Risk and Hazard	3150		93
Special Designations			
ACECs	4050		94
Wild and Scenic Rivers	4200		94
Wilderness Study Areas	4250		94
Wilderness Evaluation	4300		95
Social and Economic Conditions			
Economic	5050		99
Development		5051	99
Communities		5052	100
Private Land		5053	100
Facilities		5054	101
Analysis		5055	102
Health and Safety - Emergency Services		5151	102
Health and Safety - Waste Management		5152	103
Social	5200		104
Process			
Process - General	6000		104
Management	6050		105
Conserve		6051	107
Maintain		6052	107
Multiple Use		6053	109
Preserve		6054	110
Primitive		6055	112
Protect		6056	113
Restore		6057	115
Wilderness		6058	115
Planning/NEPA	6100		116
Analysis		6101	116
Budget/Staff		6102	117
Public Involvement		6103	118
Regulations		6104	120
Outside Scope	6500		121

Upper Missouri River Breaks National Monument RMP Scoping Comment Summary

<i>Subject Code No.</i>	<i>Comment Letter No.</i>	<i>Comment</i>
1000	1718	This area is critical for wildlife, for historic and cultural values and contains land unparalleled in the lower 48 states. These values need to be recognized and placed foremost with formal status in the management plan.
1000	1767	<p>The NEPA document should contain a comprehensive effects analysis of impacts on native plants and wildlife. Specifically, the analysis should address the following questions:</p> <p>(1) What are the results of surveys and population monitoring for TES species, BLM indicator species and other BLM-recognized species in the Monument?</p> <p>(2) What are the species-specific habitat losses expected to occur as a result of implementing the RMP and prescriptions?</p> <p>(3) What effects will permitted activities have on the distribution and movement patterns of such species? What are the effects on these species both site-specifically and in regards to habitat forest-wide as a result of the proposal? The analysis should show that the indicator species identified in the RMP are in fact appropriate indicators of environmental changes in Monument as affected by permitted activities. If the biologists feel it is appropriate to document impacts using substitute species, they should accompany such a substitution with reasonable justification. What are the impacts of the RMP and prescriptions on ungulate habitat, hunter opportunity, wildlife habitat fragmentation, riparian vegetation, key habitats, fragile habitats, grouse habitat, and biological diversity, and ESA listed species? How will species and habitat be identified and protected in the RMP? We are particularly concerned about the direct, indirect and connected impacts of permitted activities on such species and habitat, including the potential for displacement, disturbance, and invasive plant infestation and encroachment resulting from the RMP and the prescriptions. Are any individuals or populations likely to move into the area? How do the permitted activities affect all of these? To what degree are the above analyses incomplete or inadequate?</p>
1000	1767	We urge you to protect the resources of the Monument consistent with the management recommendations of pp. 1-12 of this letter, particularly the remote and undeveloped habitat of the area; elk herds; big horn sheep herds; winter range for sage grouse; habitat for prairie dogs; antelope and mule deer populations; the endangered pallid sturgeon; cliff faces; perching and nesting habitat; raptor habitat, including the sparrow hawk, ferruginous hawk, peregrine falcon, prairie falcon, golden eagle, and bald eagle habitat; shoreline areas; habitat for great blue heron, pelican, and other waterfowl; paddlefish populations; the blue sucker, shovel nose sturgeon, sicklefin, sturgeon chub and other 48 fish species; the wild Bullwhacker area; archeological and historical sites; teepee rings; remnant of historic trails to abandoned homesteads and lookout sites used by Lewis and Clark; important Blackfeet, Assiniboin, Gros Ventre (Atsina), Crow, Plains Cree, and Plains Ojibwa sites; site of the last encounter prior to the Nez Perce surrender; special interest areas, research natural areas; national registry sites; and areas of critical environmental concern. Please disclose what special protection these areas and resources will receive.
1000	1864	Identify through proper testing, the natural, ambient sound of the Monument and maintain such level as a benchmark measure against any other activity. Strive to maintain quiet.
1000	1986	The helicopter flying among the cliffs, the sonic booms and low flying jets through the canyon were reminders we were not truly in the wilderness.
1000	1988	Noise pollution seems to be the biggest problem on the river. We experienced what must have been military war games on our third day out. As a retired USAF Colonel, I feel compelled to apologize for the F-16s because I am sure this is posted in the NOTAMS as Restricted Area and the pilots have no excuse other than an uncontrolled emergency to be doing this. We also listened to a generator for an irrigator pump run all day and all night near one campsite. It was very hard to identify with Lewis and Clark's wilderness experience under these circumstances.
1000	1996	Light pollution can significantly degrade the remote, undeveloped character of the Monument. The BLM should establish acceptable limits of light pollution that are consistent with the Proclamation, and should prohibit any actions that contribute to additional light pollution.
1000	2012	Please provide a specific list and map of the "objects" that are reasons for designating the Monument. I am especially interested in the "objects" in the Arrow Creek area where most our private land lies.

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1000	2021	The BLM should ensure that protection measures are identified and implemented for plant and animal species and their respective habitats.
1000	2029	Natural Quiet. When the purveyors of this myth arrive on horseback I'll start to listen, but how quickly we forget our accepted intrusions of lawnmower, hi-fi, or noisy children. The loudest noise on the Grand Canyon trails is the wrangler shouting stories. The occasional small airplane makes less noise for a far shorter time and some still complain rather than enjoy the great surroundings.
1000	2032	The Monument holds a wide variety of paleontological, archaeological, and historic resources of invaluable significance. The BLM should continue to inventory for paleontological, archaeological and historic sites and objects and facilitate appropriate research to improve understanding, appreciation, and protection of resources. Collaborative partnerships with Native American tribes, outfitters and guides, volunteers, and researchers should also be pursued to continue documentation, study, preservation and education efforts consistent with the overall objective of protection. To prevent vandalism, theft or degradation, roads leading to known sites should be minimized or closed.
1000	2032	The BLM should identify and establish, with help from local, state, and federal scientists and agencies, baseline data that covers all the objects identified in the proclamation, then manage for maximum protection and preservation the geologic, paleontology, archaeological, biological, historical and cultural resources noted.
1050	149	Everyone we talked to on the river, unsolicited brought up the subject of annoyance from supersonic noise. The daily supersonic flights and sonic booms noise negatively impacts the quality of river user's experience. BLM needs to do some coordination w/Maelstrom AFB.
1050	1864	Maintain the Monument as class I air quality.
1050	1996	The Monument should be managed as a Class I Air Quality Area. All requirements for such a designation, outlined in Section 164 of the Clean Air Act, are met or exceeded in the UMRBNM. Air quality protection considerations should be included in all BLM actions and use authorizations.
1050	1996	A review for compliance with existing air quality laws and policies should accompany any site specific proposals affecting the Monument. Mitigation should be incorporated into project proposals to reduce air quality degradation, and projects should be designed to minimize further degradation of existing air quality. New emission sources should be required to apply control measures to reduce emissions.
1100	18	Protect the cultural heritage of our Lewis and Clark heritage.
1100	74	I am writing to express my concern about threats from road building, energy development and efforts to shrink the size of this national monument. As one of the few remaining areas which have been relatively undisturbed since Lewis and Clark passed through, all of this monument should be preserved without change for the richness of experiencing history for future generations.
1100	149	I have traveled and worked all over the western U.S. and Alaska in natural resources management, nowhere have I witnessed a better preserved example of homesteading history and associated artifacts than occurs along this stretch of the Missouri River. I would like to propose the another layer of classification be added to within the Wild and Scenic River Corridor and National Monument, and that is designation as a National Historic District. This would include the Lewis and Clark campsites and history, the riverboat history, and the homestead era history. The BLM needs to come up to speed in recognizing the value of these historic resources and protecting them.
1100	150	It is essential that the RMP be structured to ensure that the American public continues to benefit 1) from appropriate archaeological research and 2) well-designed educational programs focused on the archaeology of the area. The RMP should make reasonable provisions for suitable problem-oriented, "Investigator-initiated" archaeological research, which remains an essential and productive contributor to our understanding of past cultures and is an essential contributor to public education programs. The RMP for the Escalante-Grand Staircase National Monument has been approved and thus can serve as a model for the other BLM monuments that are in the planning process. The Escalante-Grand Staircase RMP includes research and education in archaeology and other fields as important management goals, thus setting an appropriate precedent. I urge you to adopt this approach as you develop a management for your monument.
1100	1718	The Wild and Scenic portion of the Missouri should be managed to maintain its character as it was in the days of Lewis and Clark. It is only reasonable to have at least one section of the river that is maintained for its historic and cultural accuracy.
1100	1726	Protection of all cultural and historic artifacts and sites. Your agency is required by law to consult with the tribes. This can be challenging, however, it must be done. More than lip service is needed. Face-to-face meetings with interested parties and individuals must be set up and held. Also involve interested archeologists and historians. Identify, catalog and preserve all possible sites and artifacts.

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1100	1739	The historical values of the monument are the routes of the Lewis & Clark expedition, the Indians, the steamboats on the Missouri, and the Army.
1100	1751	Let historians and archaeologists argue the authenticity of artifacts, ancient campgrounds, land forms, routes and trails. If competent or trained, public volunteers can help.
1100	1767	Consideration of cultural resources, especially Native American cultural, traditional and spiritual sites should be fully addressed in the analysis. The BLM should provide information on whether all appropriate surveys and consultation for cultural resources in the Monument have taken place.
1100	1813	The historical aspect of this area - a snapshot in time - must also be preserved. Preservation and restoration of the Hagadone place has begun and others are scheduled.
1100	1829	I feel that interpretive sites should be minimal and on boundary borders with maps identifying important areas that visitors can take with them as they explore the area.
1100	1852	Don't neglect the human history on the river in favor of the natural. The cabins, the abandoned tractors, fences, etc. all tell a story. Include the subtle and sensitive stabilization of those structures and their context in your planning and budget processes. Documentation, if it hasn't already been done, needs to be done immediately and thoroughly. Don't rule out reconstruction in some instances, as it's the idea of what these structures represented that is important, rather than the typical preservationist approach of turning every stick into a sacred fetish.
1100	1854	Historic, Native American religious and historic resources must be identified by the native American Nations, and their legal rights and cultural/religious needs fully protected by our public agencies.
1100	1864	Identify and inventory historic homesteads and other sites. Place interpretive signs at such sites and protect from vandalism. Where appropriate, remove historic objects and place in the interpretive centers for viewing.
1100	1864	Inventory archeological sites and generally educate the public about these sites at the interpretive exhibits.
1100	1905	Historical sites should be documented and preserved.
1100	1978	Adopt measures to protect the cultural, geological, and paleontological resources from artifact collectors, looters, thieves, and vandals. Determine sites or areas that are most vulnerable to current and future impact and adopt management actions necessary to protect and restore these resources. Engage the Native American community to determine whether there are sites or specific areas in the Monument of particular concern.
1100	1996	Specific Management Recommendations to Protect Historical Resources: The BLM should minimize designated roads in the area of known historical sites so as not to make such sites a destination for visitors and thereby increase their vulnerability to vandalism and degradation. The BLM should continue to inventory for historical objects, with high-use areas taking priority. The BLM should facilitate appropriate historical research to improve understanding, appreciation, and protection of historical resources. All proposed projects should include a site inventory for sensitive sites; alternatives should include avoiding the site altogether. The BLM should establish long-term collaboration with local communities, organizations, local and state agencies, Native American communities, outfitters and guides, and volunteers to plan for restoration, protection, and interpretation of historical sites.
1100	1996	Numerous studies link increased access to increased vandalism, theft, and disturbance (BLM/USFS Jan. 2001). Therefore it is imperative that the BLM minimize designated roads in the vicinity of known or potential archaeological sites so as not to make such sites a destination for visitors, and thereby increase their vulnerability to vandalism and degradation.

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1100	1996	It is estimated that only five percent of the Monument has been inventoried for archaeological resources (Majerus, pers.com 2002), therefore it is likely that large portions of the UMRBNM have as yet undiscovered sites. The BLM should identify areas of high archaeological potential and should not allow motorized access to them. The BLM should continue to inventory for archaeological resources to evaluate their potential for protection, conservation, research, or education. Surveys in high-use areas such as the river corridor or areas of high road densities should take priority due to their increased vulnerability. BLM should use the information collected to create a better understanding of cultures and should work to preserve remnants of native cultures within the Monument.
1100	1996	Public education and interpretation (particularly offsite, in visitor centers) should be emphasized to improve visitor understanding of archaeological resources and prevent damage. Archaeological site etiquette information should be readily available to visitors at access points and gateway communities. Collaborative partnerships with Native American tribes, outfitters and guides, volunteers, and researchers should be pursued to continue documentation, study, preservation and education efforts consistent with the overall objective of protection.
1100	1996	Sites recognized by contemporary Native American Indians as important to their cultural continuity should be identified, respected, and managed for preservation and continued traditional use. Consultation with appropriate Native American tribes should be a priority.
1100	2009	I would like to strongly recommend three homesteads be kept and restored to about the 1949 area. These are the Cable, Gilmore and the Gist Homesteads on the Missouri River.
1100	2010	BLM's goal should be to protect and preserve the archeological and historical sites and landscapes of the National Monument. BLM should determine the sites or areas that are most vulnerable to current and future impact and adopt management actions necessary to protect and restore cultural resources. BLM should outline specific management actions, such as stabilization, fencing, signing, closures, or interpretative development, to protect and preserve cultural resources. BLM should adopt measures to protect cultural resources from artifact collectors, looters, thieves, and vandals.
1100	2010	BLM should engage the Native American community to determine whether there are sites or specific areas in the National Monument of particular concern.
1100	2010	BLM should define the level of inventory needed to provide a basis for understanding the distribution, comparative importance, and potential uses of cultural resources in the National Monument (i.e., relative sensitivity, relative opportunities for interpretive development, relative scientific importance, relative potential for research and education).
1100	2038	Highly recommend that BLM incorporate the human history, culture, customs and lifestyle of the local area into the interpretation of the monument and recognize the important role human endeavors have played in establishing many of the qualities the monument seeks to preserve. This is an area the BLM should address with community leaders and local residents to capture the heritage of the area.
1100	2046	Many tourists floating the river enjoy knowing, not only about Lewis and Clark's journey but also the homestead and ranching history. Many will stop and visit if they see ranchers on horseback.
1100	10008	Incorporate the human history, culture and life style of local area into the interpretation of the monument and recognize the important role human endeavors have played in establishing many of the qualities the monument seeks to preserve.
1150	1996	The BLM should adopt an overall objective to manage fish and wildlife to achieve and maintain viable natural populations, population dynamics, biodiversity, and distributions in a way that protects Monument resources. The BLM should work with the Montana Department of Fish, Wildlife, and Parks and the United States Fish and Wildlife Service to accomplish this. Particular emphasis should be placed on collaboration and consultation with the adjacent CMR NWR.
1150	1996	The BLM should facilitate scientific research that improves understanding and management of fish and wildlife resources in the Monument, and incorporate this knowledge into the RMP and any future revisions.
1151	2	Encourage native species through reintroduction, natural dispersal or just ceasing human malpractice.
1151	2	You guys at the BLM should manage the Mo River Monument to encourage the return of native species of 200 years ago, and encourage and aid ones that are still dwindling from our touch and impact even though they might not be gone yet.

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1151	17	Has BLM identified any fish or wildlife species that might serve as management indicator species within the MBNM?
1151	17	Please list the exotic animal species the BLM has identified within the MBNM and/or is considering for permitted use.
1151	17	To what degree will the exotic species compete with the native species for food, space, cover and water?
1151	115	I am a wildlife advocate, but I realize that people still need to make a living in the area. With proper care and direction from the professionals within BLM and land users you should be able to equalize the situation.
1151	119	I have concerns about disturbance of waterfowl during nesting season.
1151	142	I would like to see wild horses down in the Breaks.
1151	152	Maybe the BLM can try to introduce some animal species in the Missouri Breaks monument like bighorn sheep, black footed ferrets if they haven't done it yet.
1151	153	Sharptail grouse do occur in the Breaks, however their preferred habitat is in the foothills and prairie and the Breaks is marginal habitat and not an issue. Though not discussed there is common knowledge of waterfowl and neo-tropical birds use of the river and river riparian areas, that do merit some attention in planning.
1151	153	Mule deer. Mule deer are a primary game species for the area. Populations have gone through normal cycles and no concerns have surfaced that would make us believe there is a habitat problem. A focal area for winter surveys has been along Cow Creek. Brush and juniper communities are important habitat for mule deer. If fires and prescription burning substantially reduce sagebrush and juniper there is concern that mule deer habitat will be jeopardized. Mule deer hunting is the major recreation activity for the area. There is not much emphasis on mule deer west of the PN because the access is limited and much of the area is private land. Even so, there does not appear to be a serious concern for mule deer or habitat in the area. Whitetail Deer. Whitetail Deer do not use the Breaks of South Blaine near as much as they do the Bear Paw Mountains. Habitat for whitetail is more likely west (upstream) from Birch Creek. There have been some die backs from hemorrhagic disease in this area, but again it is not likely influenced by issues of management of the public land.
1151	153	Antelope. Pronghorn antelope use some of the area, however the Breaks is peripheral habitat of the flatter lands and plains to the north and west. No conspicuous issues are known for antelope at this time.
1151	153	Bighorn Sheep. Bighorn Sheep in the area are from reintroductions in 1980 released near Stafford Ferry. This population is doing well and Mt F,W&P considers all suitable habitat to be occupied at this time. There is concern that if the population is allowed to expand beyond suitable range, die offs will be eminent. To deal with this, more permits for sheep are being allowed and animals are being captured to relocate to other new introduction areas or to infuse new genetics into existing populations. The animals captured this winter on Ervin Ridge have been taken to Hells Canyon in Idaho. There have been a couple studies on these sheep and some marked animals are still in the area. Ewes are using the Ervin Ridge along the river edge cliffs and back along the river to Ragland Bench. A separate ewe area extends up Birch Creek. Rams have been going further up Cow Creek as far as Right and Left coulees and seem to hang in the end of Ragland Bench. Though sheep have been seen west of PN on the 8 Mile Bench area, this is not an area that should be considered in the range. Some young animals have wandered as far as Loma and others to north of the Bear Paw Mtns, however this should not be considered expanded range possibilities and is a matter of concern if these animals contact diseases. Interchange across river seems to be a matter of normal range of movement and not a problem with habitat. Studies results are available from Mt F,W&P and yearly survey information is being kept by Mt F,W&P and BLM.

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| 1151 | 153 | <p>Fisheries. There is very limited knowledge of fish populations in the tributaries to the Missouri. There are small fishable trout populations in upper reaches of Eagle Creek and Cow Creek (on private land). There may also be some migration upstream and some species wash downstream, but since the streams can (and do) go dry regularly, it is not practical to commit resources to managing for these populations. It is possible that some rarer minnow or dace species could be found in some of these areas. More extensive surveys would be necessary to truly understand the circumstance. It is difficult to establish direct causal issues between uplands and fish habitat. Minimizing sedimentation and pollution is a good "rule of thumb" for fish habitat.</p> <p>There are several mainstream (Missouri River) species of interest. These include; Pallid Sturgeon (currently listed according to ESA), paddle fish, sauger, chubs, daces and likely others. Again, correlating circumstances on the public land north of the Missouri between Loma and the Blaine County line is over whelmed by what occurs in the river above our planning area. Mt F,W&P has biologists in Havre and Lewistown/Fort Benton dedicating a fair amount of their work to fisheries on the Missouri River. (Kent Gilge would be primary contact for paddlefish, where Bill Gardner in Lewistown would be primary for all other species).</p> <p>Created fisheries (pits and reservoirs that are subsequently stocked) do occur in the uplands. Various species have been stocked in different reservoirs. These fisheries are established for recreational purposes and have variable life spans due to siltation, structure failure, winter kill and other. Development of some reservoir fisheries has lead to problems of not meeting standards around the reservoir and on roads and trails from human activity.</p> |
| 1151 | 153 | <p>Mountain Lion. The Mountain lion population appears healthy in the area. Because the area south of the river generally closes for lion hunting earlier, lion hunters have shifted there activities to north of the river. Several lions are taken each year. Only a few circumstances of lions taking livestock have occurred and is not considered to be a problem currently. Mule deer and bighorn sheep provide a good prey base for lions.</p> |
| 1151 | 153 | <p>Bobcats. Bobcat populations have been very good, with trappers taking 50 - 80 cats per year. Even with this high harvest rate, cats from surrounding areas move into the area quickly as a territory is vacated. The reason bobcats do so well in the area is because of a consistently good populations of rabbits.</p> |
| 1151 | 153 | <p>Predatory birds. BLM and Mt F,W&P have random and incomplete information on raptors and would like to have more. It is not apparent that there are any problems, but this opinion is based on limited data and more a feeling of our having working in the area. Burrowing owls were inventoried by BLM in 1999 and 2000 where they were suspected, but not all dog towns were known at that time.</p> |
| 1151 | 153 | <p>Beavers. Because there is substantial interest in wood species on the river, any losses of trees and shrubs is a concern. Beavers have been a conspicuous influence on "pole" stage and older trees in some areas. There is not much interest in trapping beavers at this time, so populations are not being actively controlled. Even if all the beavers were removed, they would just move back in from outlying areas. Beavers are a natural component of the community. In areas where BLM and others are planting trees, beavers can wipe out a substantial investment. Painting with sand mixed in, appears to be the deterrent "dejour". Beavers on the river are not the only concern for trees. Ice drives, cattle grazing, dewatering, recreation, floods, droughts, all influence trees.</p> |
| 1151 | 153 | <p>Elk. Elk have been expanding in the Cow Creek/Bullwhacker area. These elk use the entire area and are likely an expansion of animals from the south Phillips area and less so from the Bear Paw Mtns. There are about 50 animals that can usually be found in the Cow Creek area. For several years these elk spent a fair amount of time in the area southeast of Butch Camp and west of Cow Creek leaving it "looking like a corral". Most of the elk hunters harvest has come in this area. Elk occasionally seen in the Birch Creek area are from the Bear Paws but don't stay long and go back to the Bear Paws. The general feeling is that the Birch Creek area is not as good habitat for elk as is the area east of Lone Tree Bench.</p> <p>There is a balance between elk populations and mule deer populations that comes into play for the area and could be a dilemma in the future. In principle, the brushier the more mule deer habitat. When brush is replaced by grassier communities the less favorable the area would be for mule deer. Elk are more opportunistic and are likely to use a wider range of habitats. Though not a concern currently, if mule deer habitat and populations are jeopardized in favor of elk, there may need to be some adjustments in our attitude toward management of habitat.</p> |
| 1151 | 161 | <p>Let the elk, the mountain sheep and the sage hens flourish.</p> |
| 1151 | 168 | <p>Wildlife should be managed for natural diversity.</p> |
| 1151 | 1706 | <p>Wildlife must be preserved because that is part of what makes the monument desirable.</p> |
| 1151 | 1767 | <p>The BLM should consider the potential for reintroducing extirpated wild species to this area, such as free-roaming wild bison.</p> |
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1151	1767	You should explicitly consider population dynamics. Population dynamics refers to persistence of a population over time—which is key to making predictions about population viability. The BLM should fully analyze population growth rate, population size, linkages to other populations, and the dynamics of other populations in examining population dynamics.
1151	1778	I would think the bison would be part of the management plan.
1151	1798	This land and water should exist as a haven for wildlife, hopefully the restoration of all species involved in the history of this area.
1151	1803	Restore the native wildlife including the buffalo & bear.
1151	1836	Completely inventory by habitat/ecosystem/watershed all terrestrial and aquatic species. Always manage to protect and improve their habitat. Favor native species in management decisions. Consider reintroduction of such natives as blackfoot ferrets & bison.
1151	1858	The monument area was formerly occupied by bison, and historic accounts show that this species was once the dominant ungulate along the Upper Missouri River. Please consider reintroduction of a small herd (50 animals) of bison that would be managed through public hunting, and not with fences and roundups.
1151	1926	The report must address the historic and prehistoric role of bison in shaping the ecology and landscape, the effects of its extermination and replacement by domestic livestock, and what effects the restoration - or non-restoration - will have on the future viability of the ecology, landscape, watersheds, and economy of the lands within the Upper Missouri River Breaks National Monument.
1151	1963	Put some bison in there, they belong there.
1151	1968	Restore native buffalo to the area.
1151	1978	Encourage the planning team to assess and evaluate the possibility of bison restoration in the Monument. However, it is critical that any bison restoration initiatives include professional wildlife management and hunting as a part of the management plan. In addition, it is imperative for the planning team to consult with the appropriate Native American tribes to facilitate their involvement with bison restoration. A possibility exists to allow bison to range across landscapes that include both federal and tribal lands. Such opportunities for co-management of a restored bison herd should be fully explored. Grazing of privately owned bison in the Monument is no substitute for wild and free ranging bison, managed as wildlife.
1151	1988	It may have been the time of year or some other natural or unnatural phenomenon, but we saw hardly any wildlife in the wilderness area.
1151	1996	Specific Management Recommendations to Protect Mountain Lions: The BLM should facilitate more research into the Monument's mountain lion population to help determine the species' population trends and ecology in the Breaks, and incorporate this data into the resource management plan. The BLM should recognize the role of lions as keystone predators and important management tools for the Monument's ungulate populations. Research suggests mountain lions avoid roads (Van Dyke et al. 1986). As access to recreational areas increases, the susceptibility to human disturbance and the avoidance of roads by mountain lions may further fragment lion habitat and decrease dispersal of subadults (Claar et al. 1999). Thus efforts should be made to minimize habitat fragmentation for lions by minimizing the road system within the Monument. Management actions should emphasize the protection of large, contiguous tracts of Monument land east of Stafford Ferry.
1151	1996	Specific Management Recommendations to Protect Elk, Mule Deer, and Antelope Herds: Minimize roads in big game habitat. Roads, even if they are only open seasonally, will continue to fragment and degrade habitat and diminish habitat security. Manage the Bullwhacker and the adjacent lands on the south side of the river as a core habitat area for big game. Hurley (1994) concluded "Restricting motor vehicle access can reduce elk vulnerability, but road closures must encompass large areas to be effective." By minimizing roads in the area, the Bullwhacker can serve as both a critical habitat and a world class primitive hunting opportunity.

1151	1996	<p>Specific Recommendations to Protect Big Game Species:</p> <p>Manage Monument lands east of Stafford Ferry similar to a wilderness area in regard to transportation and associated hunting access roads. In order to maintain viable big game herds and not to detract from the unique wilderness hunting opportunities this is a necessary action. The importance to game species of secure refuge areas free from motorized activities is well-documented (Canfield et al. 1999, Lyon and Christensen 1992:5, Lyon 1983,). Managers of public lands have few variables that they are able to control in order to promote wildlife habitat security, and these include retention of important vegetation cover, travel management, and enforcement of travel management (Canfield et al. 1999). With increased visitation and a network of roads accommodating motorized hunting and recreation it is unrealistic to expect that herds can withstand such pressure for the long-term, and that the quality of the hunting experience would not diminish. This degradation of habitat security and subsequent hunting opportunities is well illustrated in the Targhee National Forest of Idaho. Following intensive logging in elk habitat in the Targhee, access was increased due to the proliferation of logging roads in what was previously a secure area for big game. Increased access led to increased hunting pressure and eventually reduced the six-week elk season to five days—a period known as the “Five-Day War,” due to its limited time and substantial numbers of hunters. It was only after extensive road closures that the elk population began to recover and the six-week hunting season was eventually re-instated (Aslett 1988; Conley Sept.1990, Hughbanks 1993).</p> <p>Seasonal vs. Year-round Road Closures</p> <p>As Monument visitation increases, the importance of a reduced road system year-round to protect habitat security also increases. Seasonal closures to limit disturbance to wintering game species will not be sufficient to provide habitat security and will not prevent or correct habitat fragmentation. “For many years, winter ranges were considered the most limiting component of ungulate environments. However, as our knowledge of ungulate physiology and behavior has increased, it has become apparent that weight gains and nutritional contributions of high quality summer range may be of equal or greater importance in determining winter survival and reproductive success....The importance of summer range to most ungulate populations has gone unrecognized for many years. It is apparent, however, that managers can contribute substantially to the health, productivity, and survival of these populations by reducing human disturbance to summering animals (Canfield et al. 1999).” Numerous studies document the importance of quality summer range and the negative effects of disturbance and fragmentation during this period (Parker et al. 1999; Cook et al. 1996; Hines et al. 1985; Verme 1965; Moen 1978; Carl and Robbins 1988; Lieb and Mossman 1966; Phillips 1998).</p> <p>Restoring and increasing populations of big game species as a recognized object in the monument should be a management priority uncompromised by private and commercial uses that compete for habitat requirements or that degrade wildlife habitat and forage.</p>
1151	1996	<p>The BLM should make restoration and maintenance of wildlife species a stated and implemented priority over private commercial activities and uses. Private commercial activities and uses that compete with wildlife detrimentally, that utilize habitat and forage in ways and at levels that suppress wildlife population viability or result in harmful impacts to wildlife species should be modified, curtailed, discontinued in impacted areas, or prohibited depending on impact circumstances.</p>
1151	1996	<p>The BLM should increase public education and appreciation of fish and wildlife species through interpretation, particularly offsite, in visitor centers.</p>
1151	1996	<p>The BLM should recognize that significant portions of the original wildlife species assemblage are present in very small numbers, or altogether absent in the Monument. In addition several species, such as elk, are still expanding. The BLM should allow for the possibility of expansion and/or recolonization by wildlife species in the Monument, as well as the possibility of habitat restoration and linkage to areas contiguous to the Monument.</p>

1151	1996	<p>Specific Management Recommendations to Protect Bighorn Sheep Populations:</p> <p>The BLM should prohibit grazing by domestic sheep on Monument lands. Domestic sheep are the major carrier of virulent epizootics such as lungworm, pasteurilla, scabies, and pneumonia (Shinnicker pers com.20002; Irby pers comm 2002). Private landowners, should they intend to ranch sheep, should be educated as to the dangers of disease transmission between domestic sheep and bighorns.</p> <p>Of all the game species, bighorn sheep are the most affected by human disturbance (Harris et al. 1995, Canfield et al. 1999). In very open landscapes with excellent visibility, such as the Monument, the effect of disturbance is only exacerbated. Designated motorized vehicle routes in sheep habitat should be minimized. Closures should be enacted in sensitive winter range and lambing areas. Monument lands east of the Judith River, especially those in the Bullwhacker and the land across the river to the south of the Bullwhacker (Woodhawk area, etc.) should have a minimum of roads (see Transportation section below).</p> <p>Because of their susceptibility to disease, bighorn sheep populations should not be managed in such a way that the outbreak of an epidemic could devastate the population. BLM should work with Montana Fish, Wildlife, and Parks to manage the population in such a way as to minimize disease while maximizing habitat and refuge. Models developed by Clay Hickey and Lynn Irby of available sheep habitat (both actual and potential) in the Breaks area could be useful tools in determining these parameters.</p>
1151	1998	There should be no introduction of other species of wildlife such as elk, wolves, bear, sheep, buffalo or birds. Hunting season should remain open and managed with regular seasons.
1151	1999	There should be no introduction of wildlife not currently seen in this area, and present wildlife should be harvested by hunting to prevent disease, starvation and overgrazing.
1151	2001	Maintain up-to-date inventories of flora and fauna; pursue expanding the breadth of the present database.
1151	2001	Pursue and maintain healthy, natural populations, population dynamics and population distribution for wildlife species, both game and non-game species, warm-blooded and cold-blooded.
1151	2010	BLM should link biodiversity management to an adaptive ecosystem management framework established for each management unit.
1151	2010	BLM's goal should be to achieve and maintain natural populations, population dynamics, and population distributions of wildlife.
1151	2010	BLM should reintroduce native species extirpated from the National Monument.
1151	2010	BLM should define the status and distribution of the wildlife species using a variety of data resources in delineating wildlife populations and habitats before developing alternatives for each RMP.
1151	2364	As a fish toxicologist who conducts research on the effects of human impacts on watersheds, I am quite familiar with the changes in species health as a result of even minor development of watersheds. In doing so, the plan would also protect all the other resources for which the monument was set aside.
1152	17	What are the major habitat types of the area in question and where are they located?
1152	32	The wildlife living in this region may be threatened by a management plan which allows for energy development.
1152	61	Let's keep the wildlife habitat as it is now.
1152	1695	Particular emphasis should be placed on protection of critical wildlife habitats within the monument (i.e. sage grouse habitat and prairie dog towns).
1152	1699	Please protect the wildlife habitat that is there and restore the habitat that has been destroyed.
1152	1707	History records that large herds of elk, deer, bison and antelope, as well as bighorn sheep and other wildlife, inhabited the upper Missouri region in and around the present Monument. It was a "lifeline for wildlife." Most of these species are found in smaller numbers in the area of the Monument today. If they are to prosper, their habitats must be protected. Elk and bighorn sheep are ecologically wilderness animals, and their habitats must be managed accordingly.
1152	1719	Preservation and restoration of wildlife habitat is a must.
1152	1739	The herds of deer, elk and other wildlife are also major values that require protection of their range.

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1152	1756	Wildlife habitat should be the first priority.
1152	1767	We are requesting that the BLM analyze the effects of permitted activities and prescriptions in the RMP on possible biological corridors, including species-specific assessments of corridor location and use.
1152	1791	Please protect and restore wildlife habitat. River corridors are so precious in Montana. This riparian habitat is where birds and other wildlife congregate and it needs to be preserved.
1152	1795	Monitor grazing leases to protect wildlife habitat. First priority should be the protection of wildlife habitat.
1152	1840	Top priority is urged for protection of critical wildlife habitat within the Monument.
1152	1854	Critical wildlife habitats must be clearly identified on maps.
1152	1867	Restoration of damaged and sensitive Wildlife habitat should be featured in the RMP. Enhancement of biological diversity and ecosystem health through the introduction of missing native species, such as Bison and others, should be pursued. In circumstances of conflict on public lands, priority should be given to Wildlife and Wildlands protection.
1152	1881	Wildlife habitat should be the overriding theme of management, not human habitat which would include road building, interpretive centers, etc.
1152	1891	Wildlife habitat should take a little higher priority than it has in the past.
1152	1905	Wildlife habitat should be protected and restored.
1152	1976	Habitat management should be given emphasis. Strong and sustainable wildlife populations should be encouraged to enhance the wildlife viewing experience for visitors as well as for preservation.
1152	1996	<p>The ecological effects on the Monument from external influences must be considered in management decisions, and the BLM cannot make management decisions under the assumption that the surrounding private, state, and tribal land will remain in a relatively secure and undeveloped state capable of supporting viable wildlife populations. The BLM should therefore adopt a precautionary management approach which incorporates the principles of Conservation Biology, namely:</p> <p>Ensure the protection and management of enough unfragmented habitat to support viable populations of all native species in the region and maintain biodiversity.</p> <p>Manage at regional scales large enough to accommodate natural disturbance regimes such as fire, wind, and climate change.</p> <p>Plan with long-term (decades and centuries) perspective to allow for the continued evolution of species, habitats, and ecosystems.</p> <p>Allow for human use in the Monument at levels and in ways that do not result in significant ecological degradation.</p>
1152	1996	<p>The BLM should place a priority on protecting riparian and water resources within the Monument, as they are of supreme importance to the majority of fish and wildlife species.</p> <p>The BLM should work to enhance and preserve the viability of wildlife corridors, migration routes, and access to key forage, birthing, nesting, and spawning areas within the Monument.</p> <p>All proposed projects within the Monument should be required to include a site assessment for impacts to fish and wildlife species, both in terms of each species immediate response, as well as the long-term effects on individuals, populations, and communities. Factors considered in a conceptual model of wildlife responses to recreational activities by Knight and Cole 1995 should be included, as should a spatial analysis of the impact of the proposed project on habitat fragmentation. Sensitive habitat should be avoided and seasonal restrictions and closures should be implemented.</p>

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1152	1996	The BLM should minimize motorized traffic in the Monument. Fragmentation of wildlife habitat should be treated as the biggest threat to the Monument's biological resources, and grasslands are considered to be the most fragmented ecosystems in the United States (Vickery et al.; Conner et al. 2001, Van Pelt 1999). Fragmentation can be defined as the increase in distance between habitat patches and the decrease in size of habitat patches and in interior habitat (Noss and Csuti 1994). Roads have consistently been proven to fragment and degrade wildlife habitat, encourage noxious weeds, disturb wildlife and alter movements and migrations (BLM/USFS Jan. 2001). All these impacts will increase in magnitude as the area becomes more popular. The Monument's outstanding wildlife populations and their habitat cannot be adequately protected with a transportation plan that is not based on scientific review. This review must include a scientific spatial analysis of wildlife habitat fragmentation (See Transportation section below.)
1152	1996	The BLM should recognize the role of the Monument as core habitat in the context of a larger ecosystem governed by large-scale processes. Intensive, small-scale, reactive management will not be successful in protecting the resources nor in preserving the wild, undeveloped character of the Monument. An ecosystem management approach should be adopted for the Monument, with the UMRBNM and the adjacent CMR NWR managed as core lands essential to sustaining the integrity of the region. Wildlife populations and their habitats on Monument lands should be managed as core populations and habitats, providing dispersing individuals to satellite populations or uninhabited areas outside the UMRBNM boundaries, both upstream and downstream.

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1152	1996	<p>Spatial Analysis of Landscape Scale Wildlife Habitat Fragmentation in the Monument</p> <p>A transportation plan that fails to incorporate a landscape analysis of the effects of roads on wildlife habitat fragmentation will be inadequate for the long-term protection of the Monument's resources, as roads have the potential to exert wide-ranging disturbances on the landscape. Fragmentation not only includes the actual loss of habitat from the road and associated infrastructure, but also includes the increase, or introduction, of human disturbance on and off the road, as well as the introduction of noxious weeds, and the alteration and reduction of wildlife movements and dispersal. All of these result in decreased habitat security. The BLM should include a spatial analysis using digitized data (such as GIS and/or remote sensing) of roads and infrastructure in the Monument when developing the transportation plan. The analysis should focus on the lands east of Stafford Ferry, as this is where large, contiguous tracts of habitat are present and most in danger of fragmentation. Such an analysis should follow these general guidelines:</p> <ol style="list-style-type: none"> 1. The BLM should incorporate data layers of all relevant Monument resources. This data should include: vegetative covers, drainages, wildlife data such as sage grouse leks and distribution, elk distribution, bighorn sheep distribution, mule deer distribution, antelope distribution, prairie dog distribution, raptor breeding sites, special habitat areas. In addition, due to their susceptibility to damage, data on the general location of known and potential historical and archaeological sites should be included. In areas where data is lacking the precautionary principle should be applied. 2. The BLM should then overlay spatial data on all inventoried roads (i.e. linear features), as well as spatial data on all gas wells and associated infrastructure (i.e. polygonal features) onto the Monument resource data. Infrastructure includes drill pads, pumping stations, utility buildings, retention ponds, and anything else that contributes to fragmentation (this should not be confined to gas development). An average width for roads should also be calculated and incorporated. The total area and density of roads and infrastructure per square mile should be calculated from this for the area. 3. The BLM should then calculate the amount of habitat in the "effect zone (Forman 1999)." The effect zone can be defined as the area surrounding both linear and polygonal features which is affected by the existence of such features. The effect on wildlife and wildlife habitat from a road obviously extends beyond the actual area occupied by the road (for example an upland road that provides a high degree of visibility into an area of important elk habitat can have very long-reaching effects well beyond the road itself). Such effects vary with species and habitat, and therefore various ranges of effect zones should be analyzed (Urban et al.1987, Wiens and Milne 1989, Turner et al.1993). Based on the open habitat of the Breaks, zones of one mile, ½ mile, ¼ mile are reasonable and should be included. This means that for each effect zone range a buffer of each distance should be included on all sides of linear and polygonal features (for example a ¼ mile effect zone for a road will have a ¼ mile buffer on either side). The amount of habitat in the effect zone can then be calculated by summing the area of all the linear and polygonal features and their respective buffer areas. This data should be expressed in terms of total area and density per square mile. 4. The BLM should then calculate the resulting habitat security. Habitat security can be defined as core habitat which is free from the effects of fragmentation. The maximum amount of habitat security can be calculated by subtracting the total amount of habitat in the effect zone above from the total amount of habitat available. The BLM should recognize that this is a liberal estimate of habitat security, and that such a calculation is also complicated by roads that are outside the Monument. Many of these roads may access the Monument border, and thus it is important to consider these as well (rather than perform an analysis with the assumption that the Monument is unaffected by these). To help control for these roads in the analysis, the BLM should calculate the average distance from a road for any location in the Monument, as well as calculate what the maximum distance (for example there is no place in the CMR which is more than 2 miles from a road) from a road is anywhere in the Monument.
1152	1996	<p>The BLM should place a priority on restoring and maintaining riparian habitats to provide bald eagle nesting and roosting areas.</p> <p>The BLM should not allow disturbance and should not designate roads as open near known or potential bald eagle nesting sites.</p>
1152	2001	Adopt high priority management actions necessary to protect the further conservation and restoration of native wildlife and wildlife habitat with no net-loss of wildlife species.
1152	2010	BLM conduct a scientific spatial analysis of wildlife habitat fragmentation.
1152	2010	BLM should include visitor restrictions to prevent impacts to wildlife populations.
1152	2010	BLM should preserve the integrity of wildlife corridors, migration routes, and access to key forage by limiting development.

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1152	2010	BLM should adopt management actions necessary to protect and preserve the biodiversity, integrity, and population viability of wildlife.
1152	2010	Roads have consistently been proven to fragment and degrade wildlife habitat, encourage noxious weeds, disturb wildlife and alter movements and migrations. Fragmentation of wildlife habitat should be treated as the biggest threat to the National Monument's biological resources. We note that grasslands are considered to be the most fragmented ecosystems in the United States. The National Monument's outstanding wildlife populations and their habitat cannot be adequately protected without a scientifically defensible transportation plan.
1152	2032	The BLM should recognize the role of the Monument as core habitat in the context of a larger ecosystem governed by large-scale processes. Intensive, small-scale, reactive management will not be successful in protecting the resources nor in preserving the wild, undeveloped character of the monument. The BLM should allow for the possibility of expansion and/or recolonization by wildlife species in the monument, as well as the possibility of habitat restoration and linkage to areas contiguous to the monument.
1152	5693	Effect on wildlife habitat and the mitigation provided should be included and discussed in the management plan.
1152	10007	Protecting and restoring wildlife habitat should be the first priority in the management of Monument range lands.
1152	10010	Ensure that wildlife habitat is protected and restored.
1153	119	Animal damage control restrictions should be applied to all lands in the Monument area.
1153	1767	What has been the impact on predators in this Monument because of grazing? How many predators have been killed by the BLM, permittee, or APHIS/Wildlife Resources/Animal Damage Control? What has the expense been for predator control, and what are the potential costs to the taxpayer of doing further animal damage control activities in the allotments? Please disclose the agreements the BLM has with APHIS/Wildlife Resources/Animal Damage Control that would pertain to the Monument. Please disclose the cumulative impacts of animal damage control activities on all resources in the area. What are the potential costs to the taxpayers of doing control actions on wild animals in the area?
1153	1996	Any wildlife damage control efforts should be clearly limited to the individual problem animal, and only where a verified livestock kill has taken place, rather than eradication at a population level. No predator control actions should be permitted in the Monument. BLM has the authority to do this under the national agreement between the BLM and Wildlife Service (APHIS), which states that "APHIS-ADC shall conduct activities on BLM lands in accordance with APHIS-ADC policies, wildlife damage management plans, applicable State and Federal laws and regulations, and consistent with BLM Resource or Management Framework Plans."
1153	2010	BLM should prohibit animal damage control in the National Monument. In the event that animal damage control is allowed, it should be restricted to individual offending animals rather than entire predator populations. In all circumstances, the RMP should clearly state that the BLM can restrict animal damage control activities and that APHIS ("wildlife services" of the U.S. Department of Agriculture) must honor the RMP.
1153	2021	Any wildlife control efforts should be clearly focused on the individual problem animal, rather than eradication at a population level.
1154	1695	Standards and Guidelines for grazing permits should emphasize protection and enhancement of wildlife habitats, particularly during the warm-months grazing season.
1154	1796	Monitor and restrict the leasing programs for grazing. Our wildlife is so essential to our state's economy and balance in the eco-chain.
1154	1854	Drastically reduce, or ultimately eliminate all livestock from Breaks to improve wildlife habitats, wildlands and environments.
1154	1866	Certainly one of your top priority jobs is the protection and restoration of wildlife and riparian habitat. That means obtaining much better control of the grazing of domestic livestock within the monument.
1154	1915	Reduce the amount of grazing on the Monument lands to protect riparian areas and wildlife grazing areas.
1154	1924	Include enforcement of BLM Standards and Guidelines for grazing leases. The final plan should provide for greatly reducing "hot season" grazing in riparian areas and for protecting wildlife in the uplands.
1154	1974	Your plan must ensure that this wildlife habitat is safe from grazing lease abuses. This can only be done by enforcement of existing guidelines, and by a deliberate reduction of grazing allowed in watershed and upland areas.

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1154	10010	To enforce critical wildlife habitat and to foster the health of native trees and plants, BLM Standards and Guidelines for grazing leases should be monitored and enforced. The plan should provide for greatly reducing "hot season" grazing in riparian areas and for protecting wildlife in the uplands.
1200	1988	The geological formations, white cliffs, asymmetrical erosion patterns between the different layers of rock, and long stretches of absolute silence transported one to a prehistoric sense of time. I could have used more information about the geological history of the area, as this is the most striking feature of the entire river length.
1200	1996	Specific Management Recommendations to Protect Geologic Resources: The BLM should minimize designated roads in the area of known sites of geological value so as not to make such sites a destination for visitors and thereby increase their vulnerability to vandalism and degradation. The BLM should manage uses to prevent damage and minimize activities in high-use areas. The BLM should increase public education and appreciation of geologic resources through interpretation, particularly offsite in visitor centers. The BLM should facilitate appropriate geologic research to improve understanding of geologic processes within the Monument. The BLM should restrict visitor activities in areas where damage to sensitive geomorphologic features will occur.
1250	1864	Paleontology, Identify areas of critical importance and protect from vandalism.
1250	1996	Specific Management Recommendations to Protect Paleontological Resources: The BLM should minimize designated roads in the area of known paleontological sites so as not to make such sites a destination for visitors and thereby increase their vulnerability to vandalism and degradation. The BLM should continue to inventory for paleontological objects, with high-use areas taking priority. The BLM should facilitate appropriate paleontological research to improve understanding, appreciation, and protection of resources.
1250	2010	BLM's goal should be to protect paleontological resources in the National Monument. BLM should determine the sites or areas that are most vulnerable to current and future impact and adopt management actions necessary to protect and restore paleontologic resources. BLM should prohibit the collection of any specimens. BLM should outline specific management actions, such as stabilization, fencing, signing, closures, or interpretative development, to protect and preserve paleontological resources. BLM should adopt measures to protect paleontological resources from looters, thieves, and vandals.
1250	2010	BLM should define the level of inventory needed to provide a basis for understanding the distribution, comparative importance, and potential uses of paleontological, resources in the National Monument (i.e., relative sensitivity, relative opportunities for interpretive development, relative scientific importance, relative potential for research and education).
1300	1767	The analysis must fully consider the potential impacts of power transmission on wildlife, particularly the indicator species, TES species and other BLM recognized species, including impacts related to site-related electrical equipment. Potential threats include among others, electrocution, wildlife disturbance and mortality or injury as a result of collisions with wires.
1300	1978	Achieve and maintain natural populations, population dynamics, and population distributions of wildlife. Promote and adopt management actions necessary to protect the further conservation and restoration of the full suite of native wildlife including endangered species, at-risk species, and species experiencing sharp declines. As part of this analysis, BLM must consider the impacts that decades of intensive livestock grazing, road development, and off road motor vehicle (ORV) use have had on wildlife and wildlife habitat. Reintroduce extirpated native species to the area.

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| 1300 | 1996 | The BLM should consult with the United States Fish and Wildlife Service throughout the management planning process and implementation in order to ensure that management actions will not jeopardize the continued existence of special status species or their respective habitats. Furthermore the BLM should consult with the USFWS whenever activities are proposed in areas with listed or candidate species. The BLM should consult with the USFWS and state agencies to develop and implement recovery plans for all listed species. |
| 1300 | 1996 | <p>Special Status Fish: Priority should be placed on restoring natural flow variability in the Upper Missouri, particularly during the two spring run-off peaks. Without a renewal of flow variability these species' recovery goals cannot be met. Therefore it is imperative that the BLM work with the Bureau of Reclamation, the Army Corps of Engineers, the USFWS, and state agencies to provide for more natural flow regimes in the Missouri River. These regimes should be in the form of increased spring discharge from upstream reservoirs, in particular the Tiber Dam (Lake Elwell) of the Marias river, and Canyon Ferry Lake.</p> <p>The BLM should facilitate more scientific research into all five of these species.</p> <p>Stocking hatchery-reared fish of these species should be undertaken if deemed necessary, but should not be considered a substitute for natural flow restoration.</p> <p>Access and transportation routes both on and off the river should avoid critical spawning areas.</p> |
| 1300 | 1996 | Indian Breadroot and Square-Stem Monkeyflower. Both these species have been recorded inside the Monument (MNHP 2002), but very little information exists. The BLM should facilitate research and collaboration with federal and state agencies to develop and implement a management strategy. |
| 1300 | 1996 | Protect special status plant and animal species, riparian areas, and other special resources. |
| 1300 | 2010 | BLM should manage visitation and use by limiting activities and closing certain areas to prevent impacts (i.e., theft and disturbance) to sensitive species. |
| 1300 | 2010 | BLM's goal should be to ensure the protection of and recovery of threatened and endangered species, special status species, and critical habitat within the National Monument. BLM should designate protected activity centers around known species. |
| 1300 | 2010 | Unfortunately, to date, we believe that the BLM's efforts to conserve the ecosystems that support endangered and threatened species (16 U.S.C. § 1531(b)) is, at best, haphazard and, consequently, the BLM must rethink its approach to complying with the ESA, intensifying its efforts to not only comply with the ESA, but proactively prevent degradation to wildlife and vegetation to prevent future listings. |
| 1300 | 2042 | The monument does not contain unique or even unusual ecosystems which are not well preserved elsewhere in the region. |
| 1300 | 2042 | Adequate protection for any rare or endangered lower plants or small animals which might occur within the monument can be provided by the designation of a dozen or so small (a few acres each) "natural areas" which would be sufficient to protect them. Thousands of acres are not needed to protect small plants and non-migrating animals. "Natural areas" should not exceed 100 acres each, and should not exceed 20 in number in the monument. They should only be established as justified by credible science. |
| 1301 | 1726 | There is a need to document and inventory the wildlife and habitat in the monument. Sketchy information is available at this time. Special care should be taken to assess the endangered and other species of special concern. Once this is done, the plan should provide for the protection of appropriate species, the setting aside of critical habitat, and the preservation of existing habitat. This is the highest use of the area in my view. |
| 1301 | 1738 | Locate and inventory threatened and endangered species and administer the monument in a manner which preserves and enhances the habitat for those species. |

1301	1767	<p>We are concerned about possible impacts of permitted activities on threatened, endangered, and sensitive species. The environmental analyses must assess how the RMP and prescriptions modify these habitats, specifically addressing the following questions:</p> <p>(1) Would the RMP and prescriptions contribute to the extinction of threatened or endangered species?</p> <p>(2) What specific effects will the RMP and prescriptions have on habitat for threatened, endangered, and sensitive species?</p> <p>(3) What are the results of surveys in the area for aquatic species, bald eagles, peregrine falcons and any other threatened, endangered, or sensitive species which may use the habitat in the Monument and vicinity?</p> <p>(4) What are the habitat losses expected to occur from implementation of the RMP and prescriptions.</p> <p>(5) Does any part of the Monument fall within designated recovery areas of any ESA listed species? Particularly for listed species, we expect to see formal consultation with the U.S. Fish & Wildlife Service initiated.</p> <p>Thorough surveys for threatened, endangered, and sensitive species and management indicator species must be conducted before NEPA documents are finalized so that effects can be expressed in terms of populations and habitat acres, and the public has an opportunity to comment on the adequacy of proposed mitigation. Ample surveys should be conducted at times of the day and times of the year when species are most likely to be detected. Surveys should be conducted by appropriate personnel. Additionally, potential effects must be expressed both in terms of local populations and overall populations and distribution of the species in question.</p>
1301	1978	<p>Identify key wildlife areas such as leks, nesting, brood rearing, calving grounds, and winter ranges. Preserve their integrity by limiting developments within the Monument.</p> <p>Develop a monitoring plan to monitor the status of wildlife populations and to detect impacts to wildlife populations from various uses.</p> <p>Develop an inventory of all flora and fauna, including endangered, threatened, and sensitive species, to be made available to the public.</p>
1301	1996	<p>The BLM should not allow disturbance and should not designate roads as open which fragment foraging habitat or are near known or potential breeding areas and prairie dog towns critical for reproduction (Olson & Edge 1985; Werschler 1991, Dechant 2001a,b,c). Ferruginous hawks nest in both trees and on the ground (Woffinden and Murphy 1983, White and Thurow 1985, DeSmet and Conrad 1991), and protection of nesting areas from disturbance is the key to maintaining productivity and occupancy of these breeding sites (Hamann et al. 1999). A buffer of 250m should be established around ferruginous nests (White and Thurow 1985), and monitoring of nesting territories is vital to determine location and occupancy of current sites, as habitat quality (i.e. prey availability) can vary substantially from year to year (Smith et al. 1981, Gilmer and Stewart 1983, Woffinden and Murphy 1989).</p> <p>The BLM should work to maintain and protect contiguous grassland habitats from fragmentation and exotics.</p> <p>The BLM should facilitate more inventories and research into the distribution and ecology of these species in Monument.</p>
1301	1996	<p>The BLM should work to restore riparian areas in the Monument. Riparian habitat provides essential resources for a wide variety of passerine and waterfowl species—the peregrine's main prey.</p> <p>The BLM should not allow disturbance and should not designate roads around known or potential nest sites.</p>
1301	2010	<p>BLM should inventory the National Monument to determine the unit's special status species.</p>
1303	153	<p>Prairie Dogs. Effective this year, shooting of prairie dogs on public land is prohibited from March through May (when females are having pups). Shooting is legal on private and state land provided a person has permission. BLM has an extensive inventory compiled and electronic data sets of known towns as of 2001. There is an open question why there is a lack of dog town in the Cow Creek and Bullwhacker areas when there is healthy populations on either side and historically there were extensive towns in the area. No doubt some of this is a function of controls several decades ago. With designation of the Monument and concern for status of prairie dogs, BLM will need to address prairie dogs in the Monument Plan. There appears to be agreement, at least from a local area standpoint, listing (ESA) would not be justified. Other species that use prairie dog towns are likely more an issue than the dogs themselves. There is some awkwardness in determining standards of Rangeland Health on dog towns from an upland health standpoint. Because of erosion, plant utilization, plant diversity, and successional stage a town does not meet standards. However, because of the recognition prairie dogs have, it gives some priority for a species in Standard 5 (of which a component is special species).</p>

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1303	1845	Don't be bringing in varmints like the prairie dog, useless and destroying vegetation.
1303	1858	Prairie dog management on the Monument should not include control with toxicants, and an effort should be made to prevent illegal poisoning of prairie dogs.
1303	1864	Preserve and protect sage grouse habitat and big game habitat. Identify and protect prairie dog towns and keep prairie dog towns off limits to shooters. There should be no prairie dog shooting allowed in the monument. Identify areas in the Monument where bison can be introduced in order to propagate a wild bison herd. A wildlife landscape which includes bison, prairie dogs, terns, and other prairie animals should be encouraged.
1303	1996	<p>Specific Recommendations to Protect Black-Tailed Prairie Dog Populations:</p> <p>Populations of black-tailed prairie dogs in the Monument should be protected from recreational shooting. Voluntary shooting bans and restrictions in adjacent areas, such as the Phillips Resource Area, have proven inadequate and ineffective in protecting prairie dog populations and there is no reason to think these policies would succeed in the Monument. It is scientifically indefensible to assume that recreational shooting would be anything but a detriment to prairie dog recovery. High-powered rifles with high-quality scopes enable the modern varmint hunter to be consistently accurate at distances of 400 yards or greater, and an individual shooter may shoot a considerable number of animals each day (Van Pelt 1999, Kayser 1998, Knowles 1995). Besides direct mortality, shooting may contribute to population reduction and fragmentation, reduce colony productivity and health, contribute to the loss of non-target species such as ferruginous hawks, burrowing owls, mountain plovers, and black-footed ferrets, and preclude or delay the recovery of colonies reduced by other factors such as sylvatic plague (Van Pelt 1999). Montana Fish, Wildlife and Parks recognized the critical importance of regulating recreational prairie dog shooting by implementing seasonal closures on shooting at black-tailed prairie dog colonies (MFWP 2001), however this is still insufficient. Access to colonies for recreational shooting would increase the density of roads in the Monument, thereby only exacerbating both the direct and indirect the effects on the species from such activity.</p> <p>Black-tailed prairie dog populations should be protected from any shooting, poisoning, trapping, or any other lethal varmint control measures. Any management actions requiring control should involve translocation of the animals to another suitable location.</p> <p>The BLM should work with the USFWS and the Department of Fish, Wildlife and Parks, and members of the Montana Prairie Dog Working Group (MPDWG) to maintain existing prairie dog habitat and distribution on Monument lands. Furthermore the BLM should implement a plan for restoring prairie dogs to suitable habitat within the Monument in order to augment the overall population.</p> <p>In accordance with the Judith/Valley/Phillips RMP "the loss of prairie dog habitat on private land may be compensated for by developing additional habitat on BLM land in the vicinity of the habitat loss." This strategy should be extended to cover all Monument lands.</p> <p>Designated roads must avoid prairie dog towns, providing at least a 3km buffer, and should not be situated in areas where they would degrade suitable habitat. This policy would allow for expansion while discouraging visitation and facilitation of recreational shooting.</p> <p>BLM should complete and implement a plague management strategy to ensure that management levels of prairie dogs are maintained.</p> <p>The BLM should set clear objectives for occupied prairie dog acres, colony size, distribution, and density based on consultation with the MPDWG.</p> <p>The BLM should manage for large contiguous acreages of prairie dog colonies and habitat rather than relying on percentages of original habitat currently occupied or gross number of prairie dogs. Such objectives will also benefit other prairie dog associated species such as ferruginous hawks, burrowing owls, and possibly mountain plovers and black-footed ferrets.</p> <p>The BLM should identify and implement incentives for private landowners to voluntarily conserve prairie dog colonies on their land. Incentives should be focused on preserving those colonies and habitats with the most biological significance, such as those between Arrow Creek and Judith River and in the Bullwhacker area.</p> <p>The BLM should develop and implement interpretive efforts aimed at increasing awareness and appreciation of black-tailed prairie dogs in the Monument. Such outreach efforts should also include private landowners within the Monument.</p>

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1303	1996	The BLM should work to protect, restore, and augment black-tailed prairie dog towns within the Monument (see black-tailed prairie dog section below). These areas provide critical habitat for all three avian species (Dechant 2001a,b,c).
1304	17	We suggest protecting the riparian-big sagebrush interface for at least 0.8 km on either side of perennial or ephemeral springs, wetlands and streams to enhance and protect bird habitat, in particular sage grouse nesting and brood rearing habitat, as well as big game winter and seasonal habitats.
1304	17	We suggest at least 3 miles around sage grouse and sharp-tailed grouse leks be managed for climax vegetation and dense nesting cover.
1304	153	Sage grouse. Studies are ongoing to locate, inventory and quantify leks through out the area. Mt F,W&P identified a lek in South Phillips on State Land (T24N R23E Sec 36) that BLM does not have on the records. BLM has some locations of leks in the Hay Coulee area that Mt F,W & P did not have good location information on. BLM flew extended transects in 2001 for specific purpose of locating leks but had mixed success. Sage grouse populations throughout the west have not been doing very well, however information to date suggest that in our area they are not suffering as much as elsewhere. Several factors have been suggested for declines in grouse populations, including habitat loss (removal of sage brush), weather, predators, hunting seasons, drought, and others. Currently there is no firm consistent belief about how serious the sage grouse population or habitat problem is. In addition to the ongoing studies, a multi-agency working group is collecting information and holding meetings to discuss sage grouse issues and revisiting guidelines for sage grouse habitat management.
1304	163	I've been concerned that demands by the agricultural community will cause the monument to be managed primarily for livestock at the expense of recreation and wildlife. Over-grazing has caused huge problems for gamebirds such as the sage grouse; it's way past time for rotational grazing and set-asides to protect our wildlife.
1304	1978	Conduct studies on habitat manipulation on a case-by-case basis, whether for wildlife, weed control, sage grouse recovery, or fire rehabilitation. Any BLM proposed restoration activity within the Monument should be in compliance with NEPA. Conserve and restore Sage Grouse habitat within the Monument.

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1304	1996	<p>Specific Management Recommendations to Protect Sage Grouse Populations:</p> <p>The BLM should adopt rangeland management policies and practices that establish as goals restoration of the sage grouse to historic levels. The BLM should limit activities that compromise, degrade, or inhibit restoration of habitat for sage grouse.</p> <p>Due to the paucity of specific scientific information on the Monument's sage grouse populations, the BLM should adopt a precautionary management approach with this species, providing the maximum amount of habitat and protection possible. Sage grouse populations can display an array of annual migratory patterns (Beck 1975; Wallestad 1975; Hulet 1983; Berry and Eng 1985; Connelly et al. 1988; Wakkinen 1990; Fischer 1994), exhibiting a broad spectrum of behaviors from nonmigratory within their range to possessing three distinct migratory ranges (Connelly et al. 2000). In addition little information has been published on mortality of juvenile sage grouse or the level of production necessary to maintain a stable population (Connelly et al. 2000). These patterns are all poorly understood as yet (Deeble pers. comm), and therefore precautionary management is a must.</p> <p>The BLM should adopt the sage grouse habitat guidelines defined by Connelly et al. 2000.</p> <p>The BLM should adopt a no-net loss of big sagebrush habitat policy. This includes preventing wildfires and prescribed fires in big sagebrush, protecting it from conversion to other habitats, and preventing fragmentation and degradation of big sagebrush habitats. Emphasis should be placed on maintaining, protecting and expanding large, contiguous areas of sage grouse habitat.</p> <p>The BLM should minimize herbicide use when controlling exotics in big sagebrush habitat. Research demonstrates a harmful effect of herbicide on sage grouse (Klebenow 1970; Enyeart 1956; Higby 1969; Peterson 1970; Wallestad 1975).</p> <p>The construction of roads and fences in big sagebrush habitat results in habitat loss and fragmentation (Braun 1998). Powerlines and fences pose hazards by providing additional perch sites for raptors, and by grouse getting injured or killed flying into such structures (Call and Maser 1985). The BLM should ensure that designated roads avoid big sagebrush habitat and that fences and powerlines in these areas are minimized.</p> <p>Refuge habitats are very important for sage grouse during drought and winter weather (Patterson 1952; Fischer 1994; Hanf et al. 1994). The BLM should provide strong protection for the big sagebrush habitats within the Bullwhacker, as they provide critical resources, particularly during severe weather.</p> <p>The impacts from oil and natural gas development on sage grouse are not well-known, but it appears that short-term and long-term habitat loss results from energy development and mining (Braun 1998). Oil and gas operations in the Monument should avoid big sagebrush habitat, both in the construction of wells and roads and pipelines.</p> <p>Because sage grouse occupy large areas year-round (Berry and Eng 1985; Connelly et al. 1988; Wakkinen 1990; Leonard et al. 2000), it is imperative that the BLM coordinates efforts with state and federal natural resource agencies, scientists, and private landowners to successfully implement the management practices. The judgement of local biologists is of utmost importance.</p> <p>The BLM should identify existing sage grouse habitat and potential areas of restoration. Restoration of big sagebrush should be emphasized; generally the treatment should be that which is least disruptive and has the most rapid recovery time (Connelly et al 2000).</p> <p>Viewing of sage grouse leks should be carefully conducted, with disturbance minimized.</p>
1304	2001	Re-establish sage grouse to its historic range within the monument.
1304	2001	Discourage wildfires in potential sage regrowth areas, as wildfires are counterproductive to recovering sage grouse populations.
1304	2001	Encourage regrowth of Big-sage habitat types for expansion and repopulation by sage grouse. Recognize that parameters call for 7-inch stubble height to ensure successful sage grouse brood survival and manage livestock grazing to meet this end in suitable sage grouse habitat.
1305	1767	NEPA requires federal agencies to consider biological corridors. The standard for such a review is the same "hard look" NEPA requires of other environmental effects. We are requesting the BLM analyze the current status of wildlife corridors for all indicator and TES species, and effects of each of the alternatives on the linkages. That means that corridors within the analysis area, and linkages with areas adjacent to the analysis area need be examined, plus the value of the entire analysis area as part of a larger corridor within or between ecosystems.

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1305	1879	I urge an analysis of the habitat needs of native species, especially sensitive, threatened, and endangered, and urge that management be geared to protect and restore the native plants and animals.
1305	5693	Will the management plan conform to existing laws, such as those covering migratory birds, endangered species? Please elaborate in the management plan.
1306	1767	What effect will the grazing have on habitat for Proposed, BLM Sensitive, Threatened, Endangered, special concern species and other rare species? What are the results of surveys in the areas for any of these species which may use the habitat in the Monument? Has grazing fragmented the habitat for wildlife and plants? What effects will the grazing have on the distribution and movement patterns populations of T&E, BLM sensitive species and other rare and special concern species? If habitat communities are present which are not represented by indicator species for current RMPs (for example, see West HiLine RMP FEIS p, 14, Wildlife and Fisheries Management), such as migratory songbird species depending upon riparian areas and raptors, then this should be stated and the communities should be represented by choice of additional indicator species.
1350	1767	The Skalkaho Grazing Allotment EA (US Forest Service, Bitterroot NF, Darby Ranger District, 1996) indicates that, with the complete cessation of livestock grazing, it would take "5 to 25 years for the recovery of the surface layer of soil. The recovery of compacted subsoil material may require an additional 10 to 20 years" (IV-4) "Recovery of puddled soil conditions ... is likely that at least several decades would be required" (IV-5).
1350	1767	We are concerned that detrimental soil thresholds may already have been exceeded in allotment areas. The environmental analysis should include disclosures of the amount of detrimental soil conditions due to past activities.
1350	1767	Consideration of soil stability and regeneration capacity should be included that discuss: (1) Are there any areas of unstable soils which could result in mass movement, and will any proposed activities be permitted in these areas or soil types? (2) How much soil compaction and surface erosion has occurred in the proposal area because of past actions, and what will the likely erosion increases be for the RMP, prescriptions and permitted activities? (3) What has been the actual effectiveness of proposed BMPs in preventing sediment from reaching water courses? (4) What BMP failures have been noted for past activities in and around the Monument with similar landtypes?
1350	1864	Identify areas of fragile soils and manage to prevent damage.
1350	1996	Conservation of soil resources in the Monument should be an important management consideration. The BLM should minimize designated roads in areas of high erosion potential. Proposed projects should include an assessment of erosion impacts. Gas leasing development should follow a no-net loss of topsoil policy.
1350	1998	Possibly in the future some foot trails may be developed in some places but the fact that this is a highly erodable and fragile environment must be taken into account.
1350	2021	Conservation of soil resources in the monument should be a top priority.
1400	17	What are the primary limiting factors affecting the productivity of the various habitat types or range sites within the MBNM?
1400	17	Consider an alternative that would manage at least 25-33% of the MBNM for climax species.
1400	25	Restore native vegetation.
1400	1767	We request a baseline, historic analysis of native plants. This is necessary to compare historic levels with current condition in a quantitative manner. There must be areas that have had natural exclusion that could be studied as a reference point.
1400	1976	Re-establish the cottonwood and upland habitats that were seen by Lewis and Clark. The first goal should be to get the riparian and upland vegetative/ecological systems functioning properly.

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1400	1996	<p>All projects should include a restoration budget for reseeding</p> <p>Non-native species should not be used for any Monument projects.</p> <p>Monitoring of revegetation and restoration projects should be implemented.</p>
1400	1996	<p>Restoration should be the goal whenever possible (i.e. disturbed areas should be returned to conditions which promote a natural array of native plant and animal associations).</p> <p>Species used in both restoration and revegetation projects should comply with the non-native plant policy described above (i.e. native plants should be used as a priority).</p> <p>Revegetation strategies should be used in areas of heavy visitation, where site stabilization is desired.</p> <p>Restoration provisions should be included in all surface-disturbing projects, including provisions for post restoration monitoring of the area. Costs for these activities should be included in the overall cost of the project and should come out of the overhead budget.</p> <p>Priority for restoration or revegetation should be given to projects where Monument resources are being damaged, such as along the river corridor. These sites will likely be in areas near development and/or heavy visitor use. Although these areas are more likely to be candidates for revegetation projects, careful evaluation of disturbed sites needs to be conducted to include desired future condition of an area. Restoration or revegetation of areas receiving heavy use may include limits on visitor use in order to promote recovery.</p>
1400	1996	<p>The BLM should continue to coordinate with other organizations to inventory the Monument and evaluate the need for vegetation protection strategies.</p> <p>All proposed developments or surface disturbing activities should be required to include a site assessment for impacts to vegetation.</p>
1400	1996	<p>The BLM's overall objective should be to manage for a natural diversity, abundance and distribution of native vegetation types.</p>
1400	1996	<p>Specific Management Recommendations for Vegetation Restoration Methods: Mechanical methods, including manual pulling and the use of hand tools (e.g. chainsaws, machetes, pruners) should be allowed throughout the Monument.</p> <p>The use of machinery (e.g. roller chopping, chaining, plowing, discing) should be carefully evaluated for impacts to sensitive habitats (e.g. riparian areas) or potential objects of historical, archaeological, or paleontological significance. Chaining should be prohibited and roller chopping severely limited.</p> <p>Livestock grazing after native seedlings are established should be modified to ensure the survival of the native plants. Site evaluation should be required to determine when the native seedlings should be grazed again and the effectiveness of the current or new grazing system on the persistence of native plants.</p> <p>Chemical methods should generally be restricted to the control of noxious weed species discussed below.</p> <p>Biological control methods should be used exclusively for the control of noxious or exotic weed species.</p> <p>Management ignited fire could be a vegetation restoration method widely used in the Monument. This method should be used when fire has been documented to historically occur in an area, and where various factors have prevented natural fire cycles from occurring. In these circumstances, management ignited fires should be used, and should attempt to simulate natural fire intensity and timing. Specific objectives for all management-ignited fires should be developed prior to its use in the Monument. All fire activities should be conducted and coordinated with appropriate fire management personnel.</p> <p>With all the methods described above, vegetation monitoring plots should be established to determine the effectiveness of the treatments in achieving management objectives and to provide baseline data of overall change.</p>
1400	1996	<p>In keeping with the overall vegetation objectives and Presidential Executive Order 11312, native plants should be used for all projects in the Monument.</p> <p>The BLM should continue to coordinate with other organizations to inventory the Monument and evaluate the need for vegetation protection strategies.</p> <p>All proposed developments or surface disturbing activities should be required to include a site assessment for impacts to vegetation.</p>

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1400	2009	The Dean of MSU School of Agriculture was making some comments about testing some genetically altered plants in the monument. This should be outlawed in the RMP. Only native plants and grasses should be planted and grown in the monument.
1400	2010	Chaining should not be allowed.
1400	2010	BLM must analyze how to: (1) prevent conditions that have favored the introduction, establishment, and spread of invasive species and other vegetation problems; (2) restore conditions favoring native vegetation; and (3) reduce the need for continued direct control treatments of vegetation.
1400	2010	BLM should outline the status and distribution of the vegetative communities within the national monument, and develop a plan to monitor vegetation to assess whether desired conditions are achieved.
1400	2010	Vegetation manipulation should not be allowed for the purpose of increasing forage for cattle.
1400	2010	The use of machinery (e.g., roller chopping, plowing, disking) for vegetation manipulation should be carefully limited to true experimental design situations, and prohibited in all circumstances where such action will harm resources and objects. If machinery is used, monitoring plots should be used to gauge the effectiveness of the treatment.
1400	2010	Native plants should be used in all restoration and revegetation projects.
1400	2010	BLM's goal should be to manage for a natural range of native plant associations. Management activities should not be allowed to significantly shift the makeup of those associations, disrupt their normal population dynamics, or disrupt the normal progression of those associations.
1400	2010	BLM should outline the desired conditions of the vegetation types within the National Monument.
1401	1	The cottonwoods must be allowed to begin their regeneration without cattle taking away any chances they may have.
1401	17	What is the major cause of riparian area site degradation?
1401	25	Evolve strategies for the rehabilitation of riparian habitats.
1401	25	Evolve strategies to reestablish riparian vegetation in the river floodplain and remove cattle out of the river riparian area.
1401	119	Improvement of riparian areas biodiversity is a fundamental necessity.
1401	124	The lack of cottonwood regeneration is downright scary when you think of the possibility of the Missouri without cottonwoods. Action to reestablish natural water flows and fencing of new growth is required.
1401	152	The cottonwood trees along the Missouri should be allowed to spread their numbers along the river.
1401	153	Riparian communities. There is a lot of attention focused on the status of woody riparian communities along the river. A good deal of this is from the floating public on the river. Survival of woody species (cottonwood especially) is effected by numerous influences (ice drives, cattle, campers, beavers, wildlife, upstream dams, wildlife, fires/burning, etc). BLM has conducted several studies, some of which are ongoing, concerning woody riparian species. BLM and some private parties have specifically planted woody species in areas to try and re-establish some groves of trees.
1401	157	Work on getting some cottonwood regeneration in the current cottonwood groves.
1401	171	It is time to get the cows out of the cottonwood groves and attempt to perpetuate these habitats that contribute so greatly toward the visual attributes and wildlife of the corridor. Some riparian areas, in addition to the cottonwood groves, should be protected.
1401	1695	The management plan should have measurable objectives for restoring the riparian habitats along the river and for improving cottonwood tree rejuvenation.
1401	1790	Restore the landscape through limitation of cattle use, restoration of spring flooding, and other measures to encourage regeneration of cottonwood groves.
1401	1809	The BLM should develop a plan, with measurable results to restore cottonwood trees and other vegetation along the river corridor.

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1401	1809	The plan should include periodically increasing river flows to mimic flooding which would allow cottonwoods to become established on sand bars.
1401	1860	Restoration of cottonwood trees and other vegetation along the river corridor should be pursued using a written plan with achievable and accountable goals to guide the process. This will require reductions in grazing in riparian areas if cottonwood restoration is to be successful.
1401	1896	Continue to work with cooperating landowners to enhance recruitment of replacement trees into aging cottonwood groves.
1401	1897	In an effort to restore cottonwood groves, half of both sides of the river should be fenced off, back 100 yards from the river. In a few years when the cottonwoods get to the stage where cattle won't trample or eat them, the fences should be changed to the remaining bare areas.
1401	1898	I urge you to take steps to minimize the impact of grazing and camping on the river bank itself in the monument area.
1401	1946	Please fully retain and preserve all cottonwood trees.
1401	1978	Develop and implement a plan that fully protects and restores cottonwoods to wetlands, riparian corridors, and along the Missouri River.
1401	1996	Priority should be placed on protecting riparian and sagebrush communities.
1401	1996	Riparian PFC assessments should be redone for all riparian areas in the monument, and appropriate action taken to restore riparian areas to PFC where they are not functioning or functioning-at-risk. These assessments should be modified to include consideration of special status species habitat and ecological processes, considerations that the current PFC protocol does not fully cover.
1401	1996	The BLM should educate the public about the importance of riparian areas in the Monument.
1401	2001	Establish aggressive management plans that will encourage restoration of a properly functioning riparian habitat wherever the potential exists through management of livestock, people, wildlife and weed control and other vegetation manipulation.
1401	2001	Use supplemental planting of typical riparian trees like river willow and cottonwood to restore a vibrant riparian ecosystem.
1401	2010	BLM should incorporate biotic and ecological indicators into its riparian PFC assessments. Current PFC assessments are inadequate because they only cover physical (hydrology and soils) components of the system.
1401	2010	BLM should evaluate or re-evaluate all wetlands and riparian areas to assess whether they are in properly functioning condition (PFC) and should take action to restore and protect PFC on all streams.
1401	2021	Maintain and restore riparian areas to properly functioning condition and ensure that river and stream channel morphology and functions are appropriate to the local soil type, climate, and landform.
1401	2032	Develop a plan, with measurable results, to restore cottonwood trees and other vegetation along the river corridor. The plan should include removing livestock in riparian areas to prevent overgrazing during the hot season and periodically increasing river flows to mimic flooding which would allow cottonwoods, willows and other vegetation to become established. The BLM should form a close collaboration with the US Fish and Wildlife Service and Bureau of Reclamation to address the restoration of natural flow variability in the Missouri River.
1401	2039	Steps should be taken to restore cottonwoods. We understand that artificial spring floods similar to what has been done through the Grand Canyon could be useful in this regard.
1402	17	What is the major cause of upland site degradation?
1402	25	Evolve strategies for the rehabilitation of sagebrush range lands.
1402	1788	I urge that range lands be managed to include protection for native plants and grasses there.
1403	17	Please list which plants you have identified as weeds, their locations, what the rationale is for considering them weedy and what if any control efforts will be conducted. Please also list any exotic species that are determined not to be weeds, where they are located and why they occur and will continue to or not occur within the MBNM. What are the major factors or practices that have led to exotic species establishment and spread within the MBNM?

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1403	25	Please list the extant weed species, their locations and the reasons for their establishment.
1403	119	I favor implementation of a weed control plan.
1403	149	You have a real opportunity for restoration of the river terraces that have a long history of over use/abuse. Please do not plant more crested wheat grass. The goal should be to reestablish native grasses on the alluvial terraces. Presently, many areas are annual weeds and salt brush. You also have a major noxious weed problem: leafy spurge, Canada thistle, peppergrass, knapweed, etc. Native vegetation restoration within the monument could/needs to be a major program.
1403	153	Weed infestations are a notable problem on some parts of the river and BLM has personnel and resources committed to deal with noxious weeds. Insect aries are established at the Wood Property near Loma. There are also some new weed species becoming a concern (salt cedar, pepperweed).
1403	157	Control exotics.
1403	171	Habitat improvement should be enhanced. Weed control, area restoration with native species, closure of eroding ORV tracks, etc.
1403	1695	Control of invasive weeds should be a management priority.
1403	1767	<p>Grazing, motorized uses, roads, logging, mineral development and other activities on BLM lands can contribute towards the spread of invasive plants. The BLM must analyze the full impacts of invasive plants in Monument, the degree to which the RMP and prescriptions (by themselves and cumulatively) could contribute to the spread of invasive plants. The BLM needs to demonstrate that the mitigation measures effectively eliminate the causes of noxious weed spread.</p> <p>All reasonable measures that could reduce the potential spread of noxious weeds should be considered. Failure to consider strong mitigation measures violates NEPA requirements to minimize adverse effects: "Use all practicable means, consistent with the requirements of the Act and other essential considerations of national policy, to restore and enhance the quality of the human environment and avoid or minimize any possible adverse effects of their actions upon the quality of the human environment." (40 CFR 1500.2(f))</p> <p>A mere listing of mitigation measures is insufficient to qualify as a reasoned discussion by NEPA. EISs must analyze mitigation measures in detail and explain the effectiveness of such measures [Northwest Indian Cemetery Protective Ass'n v. Peterson 795 F.2d 688 (9th Cir. 1986)]. NEPA documents should describe possible mitigation measures and should discuss them in adequate detail. They should discuss or disclose the costs, effectiveness or efficacy of the mitigation measures. The long-term effectiveness of herbicides and other noxious weed treatments are of concern.</p> <p>One of the biggest problems with the BLM's past failure to deal forthrightly with the noxious weed problem on a planning unit-wide basis is that the long-term costs are never adequately disclosed or analyzed. The public is expected to continuously foot the bill for noxious weed treatments—the need for which increases yearly as the BLM continues the large-scale propagation of weeds, and fails to monitor the effectiveness of all its noxious weed plans to date. There is no guarantee that the money needed for the present management direction will be supplied by Congress, no guarantee that this amount of money will effectively stem the growing tide of noxious weed invasions, no accurate analysis of the costs of the necessary post-treatment monitoring, and certainly no genuine analysis of the long-term costs beyond those incurred by site specific weed control actions.</p> <p>The recent executive order on invasive species requires that issues relating to invasive species be dealt with by the BLM. The BLM should do so.</p>
1403	1804	There is a dismaying level of spurge and salt cedar along the river on BLM managed areas.
1403	1809	Off road travel should be prohibited within the monument, and all motorized vehicles should be required to stay on authorized roads. This would be a proactive approach to the spread of noxious weeks such as spotted knapweed, sulfur cinqfoil, leafy spurge, dalmation toadflax, cheat grass and numerous other weed species. Prevention is more effective weed control program than relying on biological or chemical treatments after the weeds have become established.
1403	1821	I applaud your noxious weed program, as much as I understand it, with use of biological and chemical means. I think you should stress the value of this service to surrounding landowners (and inholders), as they are able to harvest some of the biological methods for use on their private land, courtesy of county extension agents and your agency.
1403	1836	Aggressively combat all noxious weeds. Require all users to use weed free sources while in the Missouri Breaks.

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1403	1840	Conserving native vegetation, most importantly in riparian areas, should be a recognized goal of BLM. Exotic pest species should be extirpated, wherever possible.
1403	1860	Curtailment of ORV use has the added significant benefit of reducing the potential for introduction of noxious weeds into the area. Preventing the introduction and spread of noxious weeds is a far more efficient and effective method of controlling weeds than mitigating the damage once it is done.
1403	1937	Saw first hand how difficult it was to control the weeds and worked on controlling noxious weeds in the Arrow Creek breaks.
1403	1976	Priority should be given to aggressive weed control programs in cooperation with weed control districts and private landowners. Noxious weeds can be one of the most serious threats to the ecological integrity of the area. In the category of weeds, we would also recommend that Russian Olive and Salt Cedar (Tamarisk) be aggressively controlled.
1403	1978	Develop regulations and procedures to prevent and reduce the spread and introduction of non-indigenous, invasive plants that have a negative impact on indigenous ecological communities.
1403	1993	Zero tolerance for noxious or nuisance weeds going to seed in areas used for recreation by the public, as well as having weed control a high priority on all federal land.
1403	1996	Eradication efforts on noxious weeds should be emphasized. Russian olive should be eradicated. Because this exotic tree has only just started to colonize the Monument, and because it is relatively easy to eradicate with manual and mechanical means, the BLM should set aside funding to aggressively exterminate all Russian olive in the river corridor before it becomes well established. Mechanical vegetation restoration methods should not be allowed in these areas, unless needed for removal of noxious weed species or restoration of disturbed sites. Herbicides should be used very sparingly in riparian areas. Biological control of noxious weeds should be utilized whenever possible.
1403	1996	The Monument offers prime opportunities for horseback trips, particularly during the hunting season. Precautions should be taken to prevent the spread of noxious weeds by requiring certified weed-free hay.
1403	1996	Specific Management Recommendations to Control Noxious Weeds: The overriding priority of noxious weed control should be to achieve native vegetation objectives. Control projects should be designed in collaboration with private land owners and agencies when possible. An array of control methods should be used, however aerial spraying of chemicals should be prohibited. Control efforts should target noxious species in prioritized manner—considering the invasiveness of the species, the extent of invasion, the sensitivity of the area being invaded, and the accessibility within the Monument. Exceptional or special status species habitats should take priority. Control efforts should emphasize reducing introduction, including requiring certified weed-free hay and machine washing. A program for monitoring the effectiveness of control should be instituted.
1403	1996	The BLM should place a priority on the control of noxious weed species and prevent the introduction of new invasive species. This control should be a collaborative effort between the BLM, relevant counties, agencies, and private landowners in the Monument.
1403	2001	Minimize use of herbicides in riparian areas.

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1403	2001	<p>Give high priority to noxious weed control by aggressively seeking funds to achieve this goal. Use biological controls whenever possible, chemical control when needed to restore natural environments, techniques that fit the "integrated pest management" guidelines.</p> <p>Study the suitability of domestic goats as a bio-agent to control Russian and Spotted knapweed and domestic sheep for leafy spurge.</p> <p>Disturbed ground is prime substrata for noxious weeds to become established. Plans must emphasize reclamation begin very quickly in those activities that produce this condition: gas wells, drill pads, pipeline system and roads, etc. should be reclaimed within 90 days of work completed; avoid overgrazing by domestic livestock to reduce a disturbed ground situation.</p> <p>Minimize use of herbicides in big-sage habitat types to minimize negative impacts to potential sage grouse expansion within the refuge.</p>
1403	2009	<p>Noxious weeds are a huge problem and growing every day. Early prevention and eradication when found must be a priority.</p>
1403	2010	<p>Aerial chemical applications for vegetation management should be strictly limited.</p>
1403	2010	<p>BLM must remedy invasive and exotic species vegetation management problems.</p>
1403	2010	<p>BLM should place a priority on the control of noxious weed species and prevent the introduction of new invasive species.</p>
1403	2012	<p>Weed control should be given top priority. There should be zero tolerance for noxious weeds in areas where people recreate (camping, hiking or driving). These areas should be temporarily closed to all uses until the weeds are controlled. Allowing noxious weeds to continue spreading will be very costly to neighboring landowners and taxpayers. There isn't any good excuse for failure to control weeds. If necessary, funding should be diverted from non-essential areas, such as visitor's centers. Or use the 2 to 3 million it's costing to come up with a management plan and keep the old plan. If BLM can't handle weed control on BLM land, sell or lease some or hire private contractors to monitor and control weeds in some areas. Weed control is an expensive, never-ending process, but a necessary part of protecting the land. Spraying is the most effective long-term control and some sprays are even safe for trees (Transline). I believe there may be aquatic sprays safe near water that could accomplish "burn-down" if not eradication of some weeds. Pulling by hand, burning or using a weed-eater to cut weeds off at ground level will prevent seeds. Biological control is fine, as long as weeds aren't allowed to go to seed just so the bugs have something to eat. Floaters should be able to identify all noxious weeds they are likely to encounter and know where to report approximate locations to authorities. Those who object to all use of spray should be willing to volunteer for other methods of weed control. Pass out garbage bags to floaters who can pull weeds along their float. There could be a small reward for returning the garbage bag full of noxious weeds. State law requires control of noxious weeds for good reason. We spend considerable time and money in an on-going effort to monitor and keep noxious weeds under control (at our expense) on our BLM grazing leases and private land. Do not use weeds as an excuse to close roads or local access trails--unless use by floaters is also curtailed. Any closures should be of very short duration--weeds should be promptly controlled. If everyone (private, state and federal) had spent time and money controlling knapweed and noxious weeds from the early 1960's to present day, as my family has, Montana would certainly have much less of a weed problem now. Let's stop the spread of weeds before eastern Montana looks like the western part of the state.</p>
1403	2021	<p>Noxious weed control is vital with emphasis on prevention of noxious weed introduction by such activities as restricting hay to "certified weed-free," managing grazing practices, and restricting diligently the off-road vehicle use.</p>
1403	2029	<p>My plane brings in fewer seeds than a pair of hiking socks, and both combined are far less than brought by birds.</p>
1403	2032	<p>Given the growing infestation of noxious weeds within the monument, especially along the river corridor, noxious weeds are sure to gradually spread into the uplands. We urge the BLM to emphasize nonmotorized travel as part of a proactive approach to preventing the spread of noxious weeds. Livestock can also be carriers of noxious weeds so the prevention plan should also examine options to ensure that livestock eat weed free grasses before being transported onto the monument. All equipment involved in the gas development and extraction process should be thoroughly cleaned, washed, and inspected by BLM personnel prior to use, and after any trips outside the area, to minimize the spread of noxious weeds. Lease operators should be responsible for eliminating noxious weeds on well pads and pipeline corridors through the life of the wells and for five years post abandonment.</p>
1403	2047	<p>Weeds in the monument are a large concern and I believe the BLM is making an honest effort in mapping and control with rancher cooperation. One suggestion would be to have a sign-up for the ranchers and summer BLM employees, at both parties' convenience, to control weeds together. I think it would help both parties involved to achieve greater control on weed populations.</p>

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1403	2048	Noxious and invader-type weeds are becoming a serious problem, particularly in the river corridor. Cooperation between ranchers has been good, but a stronger effort needs to be made. Allotment holders that are not spraying should be actively encouraged to do so. BLM should help by making boats and personnel available whenever possible.
1450	1739	The unusual white cliffs and breaks are principal landscape values.
1450	1767	The analysis should develop strong visual quality objectives and prescriptions for the areas (and nearby public land or other sites of high visual concern). All important viewpoints in the area, including areas viewed from the special management areas listed on your website should be established and protected.
1450	1864	Study and identify the natural, night sky in the Monument and use this standard as the benchmark to prevent light pollution.
1450	1996	Specific Management Recommendations to Protect the Monument's Visual Values: All Monument lands should be designated Class I or Class II VRM units. The visual resource contrast rating system will be used as a guide to analyze potential visual impacts of all proposed actions. Projects should be designed to mitigate impacts and conform to the assigned VRM Class. All proposed actions must consider the importance of the visual values and must minimize the impacts the project may have on these values. There should be no Class III (the objective of which is to only partially retain the existing character of the landscape) or Class IV (the objective of which is to provide for management activities which require major modification of the existing character of the landscape) VRM units within the monument, as this is contrary to the proclamation.
1450	2009	Light pollution is becoming one of the biggest problems in the United States. With the new technology, improvement in portable batteries and light equipment there is almost nowhere even in remote locations one can go to look at the stars at night. A strong management principle should be inserted into the RMP to keep light pollution out of the monument.
1450	2021	The BLM should identify and establish baseline data on light pollution, noise pollution and air quality which will be used as a basis for establishing acceptable limits which are consistent with the proclamation.
1500	17	Please note all the water quality limited streams (WQLS) on the project area and what work has been done to develop a TMDL and monitor management's impact on water quality.
1500	112	We have had water rights for fifty years and will need to know that this is all we need.
1500	1767	What are the impacts on water quality, temperature, stream channel morphology alone, and cumulatively with roads, natural and prescribed fire, logging and other management activities? How have streamflows changed—do you have baseline information on this?
1500	1767	The NEPA document should contain a careful analysis of all reasonably past, present and foreseeable impacts to fisheries and water quality. The cumulative effects analysis should address the condition of the streams, aquifers and ground water in relation to all past management activities, as well as considering the present proposal. We request that the environmental analysis disclose the locations of seeps, springs, bogs, ponds and other sensitive wet areas, and the effects of these permitted activities on these types of areas. Where livestock are permitted to graze, we ask that you assess the present condition and continue to monitor the impacts of grazing activities upon vegetation diversity, soil compaction, streambank stability, and subsequent sedimentation. We further request that you refrain from development in riparian areas and that no new stream crossings be constructed in any drainages. The BLM should use a worst case scenario in analyzing the potential effects of the RMP and permitted activities. The NEPA document should analyze the effects of potential major mineral development related spills and contamination on fisheries, water quality, and riparian areas. The NEPA document should provide proper requirements for dealing with any and all spills and contamination, and must adequately document how the proposed mitigations will be effective.
1500	1852	Please work to re-establish and sustain natural river processes. I know much of this, if not all of it, is out of your hands, but perhaps you and future manager can be an advocate for this with the agencies whose actions do affect river flow. If the natural systems are in effect, a lot of your management issues will resolve themselves.

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1500	1864	Obtain water rights or purchase water rights for visitor facilities. Have potable water available at the few interpretive sites in the Monument. Monitor water quality within the Monument to determine impacts from gas development, cattle grazing and erosion from roads.
1500	1892	We were told by several different BLM workers not to drink river water even if filtered related to what they called "agricultural runoff." If there is so much fertilizer, insecticides and herbicides in the river it precludes drinking the water, there is a big problem! Perhaps this is something that should be checked out, before individuals such as myself get nose about it.
1500	1978	Develop a strategy to ensure that land management practices (grazing, recreation, etc.) protect water resources.
1500	1996	Ensure water is available for the proper care and management of Monument objects.
1500	1996	The BLM should develop a water quality monitoring program that ensures no water sources are classified as type 303d.
1500	1996	Specific Management Recommendations to Protect Water Resources: The BLM should ensure land management policies protect water resources. A river integrity assessment similar to that developed by Hitt and Broberg (2002) for the Flathead River should be incorporated into a watershed monitoring program for the Missouri. Such an assessment should include data from four categories: connectivity, fish assemblage structure, floodplain condition, and headwater condition. The BLM should establish collaborations with the USFWS, the Bureau of Reclamation, the Army Corps of Engineers, and the Montana Fish, Wildlife, and Parks to develop a plan to restore natural spring flow variability to the Monument in order to protect declining fish species and riparian zones. The BLM should conserve water resources by developing visitor facilities outside the Monument in gateway communities. The BLM should ensure that campground facilities require minimal water resources. The BLM should facilitate appropriate scientific research to improve management of water resources. The BLM should increase public awareness and education regarding water issues through interpretation. Water developments should only be used where necessary to protect Monument resources. Water developments should not be used to increase livestock numbers. Diversion of water out of monument should not be permitted. Water monitoring should be implemented to ensure inflow is adequate. The BLM, under no circumstances, should relinquish Monument water rights.
1500	2001	Negotiate with administrations that control water release from upstream dams to restore historical seasonal flow dynamics to the river corridor thus encouraging riparian regrowth and a return to historic riverine aquatic-habitat dynamics.
1500	2010	BLM should institute a water quality monitoring program in the monuments, where they actually monitor surface water at various points in cooperation with the State.
1500	2010	BLM should use the resource management planning process to compile information and assess the needs of the National Monument's values in terms of both ground and surface water. This provides for the eventual quantification of water claims within the National Monument. The assessment should include an examination of preexisting water rights associated with the National Monument, including, but not limited to, federal reserved water rights under earlier reservations (e.g., springs and water holes), or water rights established pursuant to state law.
1500	2010	Establish a comprehensive water quality monitoring program in the National Monument through use of multiple data points to accurately gauge water quality throughout the entire National Monument. Such a program should not only ensure compliance with CWA programs, but also ensure that water quality is sufficient to support National Monument resources.
1500	2010	BLM should not allow water developments/diversions to dewater springs or streams.

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1500	2010	<p>BLM should work with its attorneys and pertinent state governmental officials to make sure it takes timely and appropriate steps to protect the water rights associated with the National Monument. Such steps could include, amongst others:</p> <p>(1) participating in any general stream adjudication affecting the National Monument (initiated by the state and wherein the United States is served under the McCarran Amendment) to ensure that water rights claims for the National Monument are filed and protected; and</p> <p>(2) monitoring and otherwise becoming apprised of any new or proposed water developments that could threatened water supplies important to the National Monument. Examples of such proposals would be a new diversion of water upstream from the monument, or a new well drilled outside the monument or on an inholding in the National Monument. BLM should be in contact with the pertinent state officials so that the BLM can be made aware of such proposals in time to make appropriate responses.</p>
1500	2010	We strongly encourage the BLM to implement aggressive nonpoint source management practices to protect water resources within the National Monument.
1500	2010	Ensure that land management practices (grazing, recreation, etc) protect water resources.
1500	2010	BLM should only allow water development where it is the only method to protect resources.
1500	2010	Develop a strategy to ensure that the appropriate quality and quantity of water resources are available for protection of resources.
1500	2010	BLM should assess existing water developments and diversions for their impact on resources, and BLM should consider removing them where they are causing harm.
1500	2010	Pursue options for assuring water availability if necessary (appropriate water rights under state law, federal reserved water right, etc.).
1500	2010	Establish a comprehensive water quality monitoring program in the National Monument through use of multiple data points to accurately gauge water quality throughout the entire National Monument. Such a program should not only ensure compliance with CWA programs, but also ensure that water quality is sufficient to support National Monument resources.
1500	2010	Ensure that land management practices (grazing, recreation, etc) protect water resources.
1500	2021	The BLM should ensure that enough water is available in the appropriate quality and quantity for the proper care and management of monument resources. No water rights to the monument should be relinquished.
1500	5693	Effect on water quality, air quality, groundwater quality should be included and discussed in the management plan.
1500	5697	During your preparation of the resource management plan, is there anything on protecting the water quality of navigable waters of the State?
2000	166	Any commercial interests derived from the UMRBNM should be reasonable and proportional to what the area will tolerate.
2000	168	Human commerce and recreation should look to the past century, perhaps the 1960s, as a model for strategic management planning. That is a point when most wildlife returned to abundance following decimation in the early part of the century.
2000	171	Fencing, easements, purchases, restoration, recreational limits--there is a lot to be done.
2000	1712	No special concessions or privileges should be granted to commercial interests.
2000	1719	Agriculture, mining, energy exploration and harvest as well as timber harvesting should not be restricted.
2000	1739	Taking care of these superb resources requires the BLM to control public use. This includes both recreation and industrial activities.
2000	1741	Diligently protect the monument and the six BLM WSAs, including the Bullwhacker area (e.g. do not allow oil or gas development, nor mining, nor resource extraction, nor commercial development).
2000	1744	This wild and scenic stretch must be protected from oil and gas development, intrusive interpretive facilities, weeds, developed campsites, and large touring groups.

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2000	1748	With the upcoming Lewis and Clark Bicentennial, the BLM should describe in the management plan how it will handle proposals from film makers on the production of feature films that include the monument.
2000	1759	Roads and waterways should be designed to preserve land, wildlife and natural resources. No off-road vehicles, motorboats, fences, highways.
2000	1767	We would like to see a more thorough discussion of the BMPs and mitigation measures you would propose to ameliorate impacts. This discussion must go beyond a mere listing, and include the following: (1) The relative effectiveness of each proposed BMP in achieving their intended goal(s); (2) How dependent proposed BMPs are on outside sources of funding (e.g. reclamation bonds), and the likely environmental consequences should those funding sources not be realized. Any mitigation costs should be disclosed in the economic analysis; (3) What BMP failure(s), if any, have led to any needed rehabilitation in the Monument from past management activities?
2000	1769	We do not want boat access and use allocations; or any restrictive zoning.
2000	1769	We support multiple uses in the plan for all traditional and beneficial uses such as cattle grazing; water development and their current uses; off-road travel during hunting season; economic assistance for Blaine County communities for search and rescue emergencies, plus other economic activities dependent on the land such as oil and gas exploration.
2000	1790	Minimize development beyond those facilities required for resource protection.
2000	1992	I believe that we don't need to manage the "resource" so much as we need to manage the people using, and sometimes abusing, the resource.
2000	1999	Regarding the BLM land within the boundary, historical use by cattle grazing, hunting, gas exploration and transport, fire suppression, and use of existing roads and trails should be allowed for these purposes.
2000	2021	Science and research should be supported and encouraged, but intrusive, destructive activities in conflict with monument objectives should be disallowed.
2050	183	No logging.
2050	1996	The Monument holds minimal forest resources, and commercial harvests, fuelwood harvesting, and post-cutting are unnecessary activities that will result damage to Monument resources.
2050	2021	No commercial logging or other commercial vegetation extraction will be allowed in the monument.
2100	2	Consolidate federal lands.
2100	17	Are there any conservation easements on private lands within the MBNM? If any private lands will be maintained for open space as a result of this project please identify their location and owner.
2100	124	The surrounding habitat and rural character of the river must be preserved. Conservation easements with landowners must be actively pursued and sufficient funds made available.
2100	167	Seek opportunities to work with willing landowners (inholders) for acquisition of fee ownership and/or conservation easements.
2100	171	Conservation easements should be pursued with landowners.
2100	1794	Serious efforts should be made to acquire additional land for the monument from willing sellers, especially along the river corridor.
2100	1809	To ensure consistent management, prevent subdivisions and protect historic sites, the BLM should seek opportunities to obtain conservation easements, land trades or acquisitions with willing landowners.
2100	1829	Purchase private inholdings!
2100	1836	Pursue an active program of land acquisition, purchase and access. Wherever possible, reacquire old leases and permits whose terms do not protect or are incompatible with the natural landscape. When granting easements, permits or leases, demand reciprocity from grantee.

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2100	1854	Use Land and Water Conservation funds now to aggressively secure private inholdings (willing seller) within the Missouri River Corridor and the balance of the Breaks NM now.
2100	1860	Land trades and conservation easements with willing landowners and land acquisitions should be made a priority in the Monument area by the BLM so as to streamline and standardize management approaches and activities.
2100	1965	The plan should provide for the consistent search for additional land that might be added to the space of the original monument.
2100	1968	Plan for the purchase of private inholdings of the monument.
2100	1976	We encourage land acquisition by the BLM within the Monument. These acquisitions should be fee and scenic easement purchases from willing sellers using Land and Water Conservation Funds or land exchange. Land exchange should use public land outside the Monument for exchange purposes. Highest priority should be given to bottom lands that contain historic and cultural sites. Bottom lands that have riparian habitat potential should also receive high priority for acquisition.
2100	1978	Where appropriate, encourage pursuit of conservation easements for private properties to add to protection of surrounding resources.
2100	1996	Significant amounts of state land lie within or adjacent to the Monument that can be of critical resource value. State land officials have expressed interest in a land-exchange with the Monument and the BLM should pursue these opportunities. Land-exchange priorities should focus on those areas with high resource value and connectivity to other Monument lands.
2100	1996	Respect the rights of private landowners within the Monument and set aside funding to facilitate conservation easements with willing landowners.
2100	2001	Pursue conservation easements for private properties to add to protection of surrounding resources.
2100	2010	BLM should identify a strategy for purchasing or acquiring inholdings within the National Monument from willing sellers.
2100	2021	The BLM will set aside funding to facilitate conservation easements with willing private landowners.
2100	2032	To prevent further degradation of the wild character of the monument, allow consistent management, prevent subdivisions and protect historic sites, the BLM should aggressively seek funding and develop a plan to work with willing landowners to obtain conservation easements, land trades, or acquisitions for private land within the monument.
2100	2032	To provide consistent management, the RAC recommended that the Montana DNRC and the BLM engage in a land exchange program within the Upper Missouri National Wild and Scenic corridor to divest the state of its interest in the corridor. The land exchange program should be extended to include the entire monument and state land adjacent to the monument. State land officials have expressed interest in a land exchange within the monument so the BLM should pursue these opportunities. Land exchange priorities should focus on those areas with high resource value and connectivity to other monument lands.
2101	112	I am interested in having permanent access to the bottom even though the area is in wild and scenic. I would like to be sure. We will be using this road as a route to bring produce out again in the future and this is important.
2101	114	Private landowners have, and still do express their concern about access to their land that is surrounded by "public land."
2101	118	Protect private property and access to private property.
2101	1719	All private landowners should have full and adequate access to their land. Private citizens should have equal access to the area comparable to any commercial activity.
2101	1737	Provide low-standard vehicle access to the boundaries; no more paved roads than exist today.
2101	1769	We have expressed our concerns about our private land in the monument. Our personal interest for the management plan is to keep the access road in to our property open and in good condition.
2101	1780	Provide low-standard vehicle access to the boundaries; no more paved roads than exist today.
2101	1854	Allow no private landowners within Breaks NM to improve by building, rebuilding any existing access across Breaks NM land. Limit to current access standard only.

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2101	1945	Private property owners should have access to their lands.
2101	1999	One of the main issues to be addressed in the RMP is the protection of private property within the boundary and adjacent to the Monument. Landowners should be allowed continual access to their property. They should have the right of continued traditional land use such as farming, livestock grazing, hunting, to use needed equipment and to make improvements needed in these areas for water, etc. They should have freedom from trespass by Monument visitors.
2101	2010	The BLM must impose the least degrading management alternative on use of and access to the National Monument (43 U.S.C. § 1732(b)).
2101	2010	BLM should ensure that the production of feature films does not impair or degrade National Monument values or the broader health and integrity of the landscape.
2101	2024	Get adequate access through private lands on the top side and mark those boundaries.
2101	2032	Rights-of-way or easements to private property should be specific in the type of access granted and only provide legal access as it currently exists. As ownership changes hands, the type of access should be sunset and renegotiated only if necessary.
2102	79	Access must be provided on top where private lands block off the Breaks.
2102	89	Equal public access should be afforded to everyone, not just outfitters and developers.
2102	150	I strongly urge you to see that the plan includes provisions for appropriate access to the monument by qualified researchers and educators in a variety of fields of science and history.
2102	153	Access. Mt F,W&P has a program starting up where they will arrange to secure access through private land to blocks of public land. This is not intended to "take over" from BLM access to public land, but to complement each others efforts. In the local area the west end of Ervin Ridge/ Barnard Ridge/Lost Ridge is a priority. BLM has some priority access areas that will be pursued but are not actively working on them right now. One of these areas is the route into FR Reservoir that was recently reconstructed and will hopefully be a fishing reservoir in the future.
2102	170	We hope that national monument status will provide a potential source of funding to purchase additional access sites.
2102	170	More access sites are needed so that the public can enjoy the river between Coal Banks Landing and the white cliffs. At the very least, the names and phone numbers of ranchers willing to "sell" access should be published, so those with their own canoes and rafts can enjoy short float trips.
2102	180	How do you propose to allow visitation across the private land that surrounds the monument boundary? I would imagine the private owners are not excited by allowing visitors to cross their private land. Why is this not an issue?
2102	1695	I request that BLM adopt a policy of aggressively pursuing acquisition of conditional rights-of-way and easements from private landowners for the purpose of gaining public access to the boundary of monument property. Any such access acquired should not be intended to create new motorized use within the monument boundary.
2102	1745	Encourage private landowners to provide access through their property if doing so will not harm their ranching operations.
2102	1794	Do not create any more river access points. It would destroy the experience for floaters to frequently pass another bunch of cars, picnickers, etc. One of the essences of the experience is to be away from roads for several days.
2102	1818	There are issues directly affecting management of the area that have not even been mentioned, all centered around land access to the Monument, as opposed to access via the river. Private property surrounds the area, all holdings posted. There is no way one can access the area without trespassing. Unless the BLM takes steps to correct this situation and to open this public area to the public all other issues are moot.
2102	1821	I would encourage the BLM to provide public access to all the public lands, in some cases perhaps buying easements.
2102	1854	Acquire federal rights-of-way across state and private land to the monument boundary (only).
2102	1864	There should be no guaranteed right of way for a private landowner who does not permit the public to access public land. Fair use requires that the public be permitted access to public land just as the private landowner has access to his land.

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2102	1937	We should not be shut out with a gate.
2102	2009	The road or trail from the Cow Island Trail across Billy Robinson's private land to the Cable homestead has no public access. I am asking the BLM to purchase an easement across Robinson's land about 5 miles to BLM land. I am then asking the trail/road be open to the Bullwhacker Creek Automatic Weather Station about 2½ miles above the Gist Homestead. The road from the weather station at Little Bullwhacker to the Gist Homestead on the river should be closed.
2102	2009	Permittees should not be allowed to keep the public from public lands. Large areas of the south side of the monument have no public access except by the Missouri River. This is wrong. If there is a road across private land to public land, every possibility should be taken to purchase an easement across private land to the boundaries of public land. The access should not extend beyond the private/public boundaries.
2102	2010	BLM should prohibit new rights-of-way in the National Monument, except those providing access to private property.
2102	2010	BLM should specify how it plans to address access to private property.
2102	2021	The BLM should provide equitable access for hunting and other purposes and discontinue those provisions that contribute to exclusive private use of public land.
2102	2028	Trappers have historically accessed this land from both sides and from end to end and the Montana Trappers Association requests that this access remain as such.
2102	2032	As recommended by the RAC, access to the river should be confined to the primary launch sites utilized prior to the year 2000. Increasing access to the river will make it more difficult to control recreational use and further diminish the wild character of the river.
2103	1864	No new communication sites on Monument land.
2103	2010	BLM should specify how it intends to handle existing permits within the National Monument.
2103	2010	BLM should specify how it intends to handle requests for new permits within the National Monument.
2103	2021	There should be no new utility rights-of-way and communication sites constructed within the monument.
2103	2032	No new utility rights-of-way and communication sites should be constructed in the monument.
2150	1	One of the largest impacts on native vegetation and riparian areas health is the excessive amount of grazing that occurs. During the hot season cattle simply should not be allowed to trample in the riparian areas.
2150	2	Eliminate degrading range practices (and in light of how you all should have bison and not cattle, the only range practice should be that of free-roaming buffalo). Do not renew the horribly cheap grazing leases when they come up for reevaluation. Do not build new fences. Terminate grazing leases and help locals stay on land sustainably.
2150	17	Has livestock grazing been identified as a primary reason for failing to meet Rangeland Health Standards anywhere within the MBNM?
2150	17	How does this decision allow for and mitigate the cumulative effects of livestock grazing impacts?
2150	17	Consider an alternative that would manage the public lands within the MBNM without reissuing federally subsidized grazing permits for domestic livestock use.
2150	17	Please list all the permitted grazing allotments, permittees, the expiration dates of the current grazing permits and the schedule for NEPA compliance in the environmental review.
2150	17	Please avoid building or repairing any livestock improvements (fences, water developments, stock tanks, pipelines, salt grounds, etc.) unless they are designed in conjunction with climax management areas that are protected from livestock use.
2150	17	Do exotic livestock, in particular, those utilizing the public lands within this MBNM, harbor any diseases that may harm or infect native wildlife? How will these effects be analyzed, avoided or mitigated?
2150	17	We would like to see the specific photos and data related to the Rangeland Health Standards for all BLM grazing allotments within the MBNM displayed in the environmental review.

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2150	17	We encourage BLM to consider an alternative that would phase out all domestic sheep grazing within the MBNM if any is currently permitted. Other alternatives could analyze various intensities, timing, length and type or class of livestock use where grazing is permitted within the MBNM.
2150	25	Cumulative effects analysis of cattle grazing and ATV roads impacts on wildlife should be clearly studied.
2150	65	Grazing/ranching should be allowed to continue.
2150	67	I would like to see the cows kept out of the campgrounds.
2150	87	The emotional "cattle can be seen standing in the river adding to the high nutrient level" implies that the cattle limit their discharge to the location of a flowing river which probably dilutes almost as much as in a public swimming pool. If domestic livestock grazing is "the primary reason for the lack of riparian vegetation and regeneration of willow and of willow and cottonwood" rather than the numerous beavers, why are there more trees now in Fergus country than when L&C wrote?
2150	92	Cows should not be allowed within the river corridor. Grazing should be limited to protect riparian areas, water supplies, and to allow regeneration of new cottonwood seedlings.
2150	117	I believe from the very beginning it was agreed that livestock grazing be allowed.
2150	118	Whatever you can do to keep agricultural landowners on the land should be pursued.
2150	119	Cross-country travel for administration or grazing permit owners should be with the least invasive transportation.
2150	124	The BLM needs to do more to encourage good grazing practices.
2150	144	Do not eliminate grazing, but control it where it may come into conflict with recreational users.
2150	149	I attribute the paucity of wildlife to the poor/depleted habitat conditions resulting from years of grazing over-use, the destruction of natural vegetation, and subsequent loss of habitat productivity.
2150	149	Restoration of natural vegetation and wildlife habitat improvement and reintroduction within the monument should go hand in hand. In a week on the river we observed no raptors, none. We saw only a few deer, no bighorn sheep, no elk, only one covey of sharp-tail grouse, and some cottontail rabbit.
2150	149	Currently, many of the cabin/dugout structures are not fenced and are being destroyed/damaged by livestock using them for shelter.
2150	152	Cattle and domestic sheep should not be allowed to graze in the federally owned land in the monument.
2150	157	Reduce or eliminate livestock grazing. Basically, keep it like it is, but try to get some of the cows out of there.
2150	170	It is very important to honor the agreements that have been made with the local ranchers.
2150	171	Grazing could continue but be more carefully regulated.
2150	171	Landowners that manage their land well should be encouraged and offered preference for grazing leases.
2150	174	Restrict livestock grazing from the sensitive, fragile riparian areas. Consider retiring some AU leases.
2150	178	RAC Subgroup grazing management issues of concern: 1) Getting grazing management consistent with current principles & standards; 2) livestock-visitor conflicts; and 3) water development to keep cows off riparian areas & streams.
2150	179	It's hard to find a non-designated camping spot along the river that is not covered in cow crap. We hate camping at designated sites. Solitude is one of the most important qualities of the breaks. We would like to see cows kept away from the river.
2150	183	Protect riparian areas from being trampled by livestock. Keep livestock out of designated campsites in the river corridor.
2150	1678	Current grazing rights should be honored but not renewed. There is plenty of additional land outside the monument.

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2150	1681	Retain cattle grazing within the area. Cattle grazing is as much a part of the tradition in the area as anything. It is a traditional use that has been in existence since man first settled the area. It would serve no purpose to eliminate it. It does not interfere with the wildlife or other uses. Landowners should be allowed to retain the grazing leases on public lands they now possess, unless there is a demonstrated conflict with wildlife management.
2150	1702	Get the cows out of the river. I've camped along the wild and scenic and it's a gross mess, with cow dung 6 inches deep in the campgrounds.
2150	1718	Grazing standards need to be monitored and enforced to maintain critical wildlife habitat.
2150	1725	Range lands management should look to protecting and restoring wildlife habitat, with hot season grazing greatly reduced in riparian areas.
2150	1726	Protect riparian areas by requiring those grazing rights to adhere to strict standards to prevent damage by cattle to these fragile areas. New methods for delivering water to the cattle must be used.
2150	1746	Sound management principles for livestock grazing should be a high priority, to protect the resource, which includes excellent wildlife habitat.
2150	1751	Where cattle, horses and sheep have damaged grasslands and wetlands, restore, monitor and correct. Where cattlemen have brooked little concern for rules and regulations, start using your laws; wildlands should protect wildlings, not wild people. Grazing in riparian areas should be stopped or monitored and controlled.
2150	1766	Even domestic animals should not be allowed to graze. That would lead to trucking, etc.

2150

1767

Grazing by cattle and other livestock on public lands has caused a tremendous amount of damage for the benefit of a handful of ranchers who profit off public lands at the expense of both taxpayers and biological integrity. We have specific comments regarding RMP analysis, and recommend steps you should be taking in considering the appropriateness of grazing and the degree to which prescriptions permit grazing.

If, in the nineteenth century people could foresee the present damage done by livestock grazing to the ecosystems in the western U.S., they would have considered the idea of running livestock reckless and radical. No rational person would have considered it a good thing that the vast majority of riparian areas in the West would be heavily trampled, the fisheries habitat all but ruined, and the water polluted by excessive sedimentation and livestock waste.

Given the large-scale and undeniable damage to ecosystems that the livestock blight has caused here in the western U.S., we are opposed to continuing this reckless and radical practice on public lands unchecked. The idea of somebody's domestic animals eating up the riparian areas—the most biologically diverse portion of terrestrial ecosystems—and defecating and urinating in the creeks and springs on our public lands is sickening enough. That the public pays for these devastating activities in the form of subsidies for welfare ranchers is a symptom of government bureaucratic gridlock.

Since it is likely that grazing has caused serious ecological damage to areas within this Monument, an issue thus arises that no amount of livestock grazing can be sustained in these areas in the foreseeable future due to the needs the areas have for recovery. Recovery of the resources impacted from past grazing should receive highest priority in both the Scope and the Purpose and Need. Consequently, we request that alternatives focus on recovery and rehabilitation for those areas previously impacted from grazing—fish and wildlife habitat improvements, watershed rehabilitation, and erosion control. There should also be other alternatives that completely eliminate livestock grazing in the Monument and in WSAs, roadless areas, areas of special concern, and other unique or important biological, cultural, historical, and recreational areas. Such alternatives would fully disclose to the public a full and reasonable range of alternatives, as NEPA requires.

Due to the distaste the general public has towards government subsidies in this era of reducing government waste, all alternatives that propose continued grazing should make permittees rather than taxpayers pay for the full amount of any "improvements" and administration costs.

The analysis should identify areas that are economically, biological, or physically unsuitable for grazing. These would include areas that cannot be grazed in the near future due to damage from grazing.

The RMP analysis should analyze the significance of the impacts of past impacts on populations of T&E, BLM sensitive species and other rare and special concern species accruing from livestock grazing, its connected actions, and other human development activities. The environmental analysis should discuss the available data from current. If sufficient data is not available to indicate trends for these species, the environmental analysis should say so and the analysis be expanded to acquire the information so that cumulative impacts from further grazing and other ongoing actions in the area can be adequately analyzed.

What is the significance of the impacts from past livestock grazing and other management actions on the diversity of plant species in the Monument?

Livestock grazing has detrimentally impacted many riparian areas. It is ultimately reasonable to cease grazing in this area until riparian areas have had time to recover.

What is the condition of all watersheds and other riparian areas in the Monument and downstream, especially in regards to past management activities including livestock grazing? Please analyze the significance of the adverse impacts grazing has had upon fish and other aquatic organisms. The environmental analysis should disclose the results of up-to-date monitoring and surveys of fish habitat and watershed conditions.

Riparian studies should be undertaken and disclosed for all streams and wetlands in the Monument. Please disclose in the environmental analysis the stream encroachment of forest habitat into the riparian zones, overall percentage of stream bank damage/shear, degree of water table lowering due to livestock grazing, and estimate of stream widening and water level lowering. Are there streams that are now dry or ephemeral due to livestock grazing that were once perennial? Compared to natural levels, what are the sediment loads, levels of fecal coliform bacteria, stream bank stability and streamflow rates of the streams in the area? Please disclose the locations of seeps, springs, bogs and other sensitive wet areas, and the effects on these areas of livestock grazing.

The environmental analysis should show that the proposed alternatives would comply with the Clean Water Act and all state water quality laws and regulations. This includes stating the beneficial uses of watercourses and how these beneficial uses have been impacted or degraded by past management actions, and how these beneficial uses would be impacted by the various alternatives.

We request a thorough analysis of the impacts of cattle grazing on noxious weed propagation. What new invaders are present and how will these be controlled when wandering livestock eat seed or carry it to new sites? For existing weed sites, effective management would involve yearly follow-up and monitoring of each noxious weed site and closure of affected main roads to prevent vehicular spreading to even more areas.

Cattle trample and eat young trees— examining new plantations in national forests provide graphic examples. What is the impact of grazing on the trees and plants of these allotment areas?

Compaction by cattle likely slows seedling growth rates, creates stress for any plant that is stepped on, and may impact roots of larger trees as well. Compacted soils on slopes don't retain moisture as well, and this can cause more runoff than uncompacted slopes, and impact riparian areas that typically absorb the water. Please analyze the effects of cattle on native plant diversity and soils.

The environmental analysis should analyze the degree to which livestock grazing has affected the succession of forested stands in the area, and thus will continue to cumulatively impact the vegetation and wildlife species.

From the abstract of Belsky and Blumental (1995):

Ponderosa pine and mixed-conifer forests of the western interior United States have changed structurally and compositionally since settlement of the West by EuroAmericans. Many of these forests historically consisted of widely spaced trees underlain by dense grass swards; however, over the last 100 years they have developed into dense, often diseased, flammable thickets. These changes, sometimes referred to as a decline in "forest health", have been attributed primarily to two factors: active suppression of low-intensity fires that formerly reduced tree recruitment, and selective logging of fire-tolerant and disease-resistant trees. A third factor, livestock grazing, is seldom discussed, although it may be more important than the other factors. Livestock alter forest dynamics (1) by reducing the biomass and density of understory grasses and herbs, which otherwise outcompete conifer seedlings and prevent dense tree recruitment, and (2) by reducing the abundance of fine fuels, which formerly carried low-intensity fires through forests. Grazing by livestock have thereby contributed to increasingly dense forest thickets. Exclosure studies have shown, in addition, that cattle and cattle alter ecosystem processes by reducing the cover of herbaceous plants and litter, disturbing and compacting soils, reducing water infiltration rates, and increasing soil erosion.

Have there been any permittee violations of grazing permits in the Monument? We would like to see a complete discussion of these violations and discussion of the action taken by the BLM. Such a discussion is fully within the scope of the analysis, since compliance with permit conditions is assumed in environmental analysis impacts analyses.

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| 2150 | 1772 | Wildlife and domestic livestock grazing can go together, but close monitoring and surveillance is a must. We have to respect the present grazing privileges now held by the ranchers involved. I'm not so sure that the economics now facing the ranching community won't provide an opportunity for this conflict to solve itself. Plus, protect the riparian corridors from excessive livestock use. |
| 2150 | 1809 | The plan should include removing livestock in riparian areas to prevent overgrazing during the hot season. |
| 2150 | 1821 | Grazing should continue. However, the pay system needs to be updated. I believe when a person pays market value per animal unit for grazing, he is much more apt to care for the public land as if it were his own. If he has to pay market value for grazing, he will move his cattle when the range is stressed, because he won't be getting his money's worth otherwise. At the present ridiculously low fee, ranchers are actually encouraged to just "turn 'em loose" on public land. There are plenty of ranchers who don't have the privilege of public land grazing, and would perhaps support the Monument more (although not publicly in front of their neighbors), if they knew the public land ranchers were having to pay a fair price for grazing. |
| 2150 | 1829 | Measures to embrace wildlife and impacts by grazing on wildlife need to be analyzed. |
| 2150 | 1829 | Impacts of grazing must be addressed. |
| 2150 | 1845 | We need to maintain water development and current use practices in the monument area without further restrictions and limitations on livestock watering and other beneficial uses. |
| 2150 | 1845 | It is our hope that we can continue cattle grazing and agriculture use as we have and that we won't be shut off because of tourists. |
| 2150 | 1854 | Restoration and biologically-correct riverine management of the Missouri River Corridor requires complete removal of all livestock and uses thereof permanently, immediately, from all federal land within the river corridor. |

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2150	1864	Strictly monitor livestock grazing within the federal and BLM laws and guidelines. The BLM should not rely on self policing methods by permittees. Those permit holders who violate their permits should be given notice that the permit will terminate unless the holder brings the operation into compliance. There should be no hesitation to hold permittees accountable under the terms of their contracts. Identify areas where diverse camping will take place which may come into conflict with cattle and modify the grazing permit accordingly. Strictly monitor rangeland health.
2150	1875	Maintain current grazing and agricultural uses.
2150	1882	Cows need to be controlled. We attempted to camp in several cottonwood groves that were overrun with manure, flies and the cows that brought both. This rendered these areas unusable by hundreds of floaters for the benefit of one rancher.
2150	1891	I hope that the monument managers will not be bullied by ranchers when cattle should not be grazing the lands or destroying riparian areas.
2150	1892	Some of the areas we saw are being mutilated by cattle, particularly in riparian areas. I'd certainly support better range management, including some judicious fencing to limit (not exclude) bovine access to the river.
2150	1905	Grazing and gas leases should be closely monitored with standards strictly enforced.
2150	1908	We were appalled to see cattle grazing on state/national lands. To be in a remote wilderness area with "cows" is totally absurd. We urge you to stop this practice.
2150	1913	Standards and Guidelines for grazing leases should be monitored and enforced. The plan should provide for greatly reducing "hot season" grazing in riparian areas and for protecting wildlife in the uplands.
2150	1931	Grazing needs close regulation, with extra vigilance towards lowland grazing in the dry season.
2150	1933	Grazing rules simply must be tightened if these incredibly important riparian communities are to be perpetuated.
2150	1935	Grazing should not be allowed in this sensitive area in order to protect native trees and plants.
2150	1940	Your plan must be certain to ensure that this wildlife habitat is safe from grazing lease abuses by a deliberate reduction of grazing allowed in watershed, riverside and upland areas.
2150	1976	We endorse livestock grazing that is compatible with vegetative recovery. The discouragement of hot season grazing will be an important factor in re-establishing cottonwoods. Even without normal river flooding we notice cottonwood regeneration on areas that are protected from hot season grazing. Reestablishing riparian vegetation will likely result in perennial flow in some side drainages (such as Dog Creek). This will also result in continued improvement in wildlife habitats. Livestock grazing is a privilege authorized by the Taylor Grazing Act. The FLPMA requires that grazing be done in a sustainable manner. This is the case inside or outside the Monument.
2150	1976	Undaunted Stewardship (MT Stockgrowers) should be encouraged if it is focused on the improvement of grazing of poorly managed allotments, historical preservation and restoration.
2150	1976	We suggest that the plan provide flexibility for a trail bison grazing program in some areas of the Monument, possibly Bullwhacker Creek. Of course, this kind of a program would require a grazing permittee that was supportive and agreeable.
2150	1978	Develop livestock grazing plans that fully protect and restore wetlands, riparian corridors, and rare ecological plant communities.
2150	1978	Evaluate livestock grazing as a vector for the spread of weeds.
2150	1982	Grazing on riparian areas should be very closely monitored to prevent irreversible destruction of these areas. Preservation of land in its natural state is not compatible with overgrazing riparian areas.
2150	1985	The RMP, while recognizing the rights of ranchers to graze cattle, should do more to protect the riparian zones and cottonwood trees.
2150	1996	Manage grazing to meet BLM Standards and Guidelines, and provide a means of effective implementation, monitoring, and enforcement.

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2150	1996	<p>It is critical that BLM Standards and Guidelines for grazing are met on all allotments containing riparian areas. Hot season grazing in these areas should be prohibited and grazing of riparian areas in general should be minimized.</p> <p>Grazing should be managed at a level that takes drought, and its subsequent effect on wildlife species, into consideration.</p>
2150	1996	<p>Specific Management Recommendations for Livestock Grazing:</p> <p>The RMP should review grazing practices and make land use level decisions about whether grazing is suitable in all areas. This is appropriately done at the land use level stage and is based on FLMPA's multiple use standard, which requires the BLM to balance competing resource values to ensure that the public lands are managed in a manner "that will best meet the present and future needs of the American people." [National Wildlife Federation v. BLM, 140 IBLA 85, 101 (August 21, 1997)]. The BLM can make decisions in the plan that certain areas should not be grazed and they should consider it if appropriate.</p> <p>The RMP should also outline how the BLM will meet their responsibilities under the Standards and Guidelines for Rangeland Health. Such an outline is a separate responsibility from the suitability review. BLM should assess each allotment under existing regulations (43 CFR 4180) and the Standards and Guidelines for Rangeland Health, and implement required changes in grazing practices. Handbook 4180-1, Rangeland Health Standards, instructs the agency to establish a "consistent, defensible approach to drawing conclusions" regarding attainment of rangeland standards. The handbook requires "an approach that is logical and provides a pathway between data, indicators, standards, and conclusions," and providing quantifiable indicators (e.g., ground cover, plant pedestaling, and other signs of erosion such as rills, gullies, etc.). The BLM must lay out a clear process using relevant indicators that assure an accurate picture of rangeland health. Technical Reference (Interpreting Indicators of Rangeland Health TR 1734-6) details a process for doing this, as does Handbook 4180-1 which states that the staff should: 1) select indicators that adequately document or explain findings; 2) select the proper intensity of assessments and density of observation points; 3) use scientifically accepted methods and, at a minimum, use the methods outlined in the BLM technical reference; and 4) assess the reference areas to establish a comparative baseline. It appears that the Standards and Guidelines currently used by the BLM are generally consistent with these guidelines, however enforcement is the critical issue.</p> <p>Standards and Guidelines should include a schedule for assessing allotments and implementing changes where necessary.</p> <p>Assessments of grazing leases should be conducted by a truly interdisciplinary team.</p> <p>Standards and Guidelines must include a collection of sufficient quantitative and supplemental qualitative information adequate to initiate monitoring</p> <p>Standards and Guidelines must include a commitment to assess springs and riparian areas for PFC, incorporating biotic and abiotic indicators, and commitments to reassess where data is not current.</p> <p>Standards and Guidelines must include a commitment to upland assessments, including evaluation of cryptobiotic soil crusts</p> <p>The BLM must enforce the grazing Standards and Guidelines in a timely, effective manner.</p> <p>Hot-season grazing (June-Aug.) in riparian areas should be prohibited. Grazing in riparian areas in general should be very limited.</p> <p>Additional funding should be earmarked to provide for off-site water for cattle during the hot season. However, these actions should only serve to remove livestock from riparian areas and not to increase livestock numbers in upland areas.</p> <p>Grazing levels should be managed to address their effects on wildlife. Detrimental impacts to wildlife associated with grazing, such as loss of cover and security, forage reduction, alteration of essential species habitat components, and other types of negative competition must be minimized. In the event of such impacts, adjustments, limitations, and if necessary curtailment of grazing should be triggered.</p>
2150	1996	<p>Fences can serve a variety of uses in the Monument, the most important being to manage livestock and visitor use and protect resources. Fences should be used only when necessary to protect Monument resources and be consistent with VRM principles. All fences should be built to wildlife compatible standards.</p>
2150	1998	<p>The livestock grazing permits should remain under the jurisdiction and control of the local BLM office. No authority or control should be given to the UMRNBMM or any other agencies.</p>

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2150	1998	Weeds need to be controlled and it has been proven that livestock grazing helps these areas and provides better range for wildlife.
2150	1999	Current grazing leases should pass to future generations or to purchasers of private property attached to these leases, as they are important to the private property value and production. These leases should be administered locally by BLM as is currently done.
2150	2001	Recognize that the BLM has the tools to effectively manage cattle use of the monument. Institute active monitoring and enforcement of grazing allotments to insure that lessees are adhering to management plans and respecting wildlife population priorities. Implement rest-rotation grazing plans that improve wildlife habitat. Ensure that new and existing livestock fences comply with legal parameters as directed in BLM Manual H-1741-1 that do not inhibit free movement of wildlife. Those standards for domestic fence requirements as quoted, "...3-wire, 38-inch height, with bottom wire 16 inches off the ground..." fences constructed as such comply to the Unlawful Inclosures (sic) of Public Lands Act of 1885 (43, USC, 1061-1064; 23 Stat. L. 321, ch. 149).
2150	2005	New rules may be needed to keep cows out of the cottonwoods and to prevent overgrazing.
2150	2009	Giving permission for a permittee to drive across a WSA to observe his cattle must be stopped immediately.
2150	2009	I support grazing by authorized individuals whose allotments have been reviewed by the NEPA process. The allotments must be monitored for utilization and stubble heights on upland pastures and proper functioning riparian areas on wetlands. A major problem in the breaks is "unauthorized livestock of an unknown origin." This has to change, if not the permit should be canceled. There must be a nationwide movement to bring grazing fees up to the average charged on private lands. Ninety percent of the livestock in this country are raised on private land. Almost all the problems associated with public land grazing would go away if there was parity in pricing between private and public ranges.
2150	2010	BLM should determine a maximum carrying capacity that ensures natural resource sustainability within the National Monument.
2150	2010	Manage livestock grazing in a manner that will not harm the objects or resources that the National Monument was established to protect. Grazing should be managed consistent with the primary purpose of resource protection.
2150	2010	The RMP should establish a detailed process for completing allotment assessments pursuant to the standards and guidelines and rangeland reform regulations. Such a process should outline a: Defensible and consistent process for doing rangeland health assessments, including appropriate assessment methodology (at a minimum, through use of BLM technical references as per BLM Handbook 4180-1) that details the proper intensity of assessments and density of observation points, appropriate indicators linked to the standards and guidelines, and the use of reference areas; Schedule for assessing allotments and implementing changes where necessary; Use of truly interdisciplinary teams to conduct assessments; Collection of sufficient quantitative and supplemental qualitative information adequate to initiate monitoring; Commitment to assess springs and riparian areas for PFC incorporating biotic and abiotic indicators (and to reassess where data becomes old or otherwise infirm). Commitment to upland assessments including evaluation of cryptobiotic soil crusts.
2150	2010	Manage livestock grazing in a manner that will not harm the objects or resources that the National Monument was established to protect. Grazing should be managed consistent with the primary purpose of resource protection.
2150	2010	Ensure that grazing conforms to the "Standards and Guidelines for Grazing Administration" by placing a priority on assessing areas within National Monument to see if they are meeting the standards and guidelines. Where standards and guidelines are not being met, BLM should take immediate action to rectify grazing management.
2150	2010	BLM should address how it will handle conservation buy-outs of grazing permits/leases and, furthermore, identify how it will retire such permits through the planning process.

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2150	2010	<p>The RMP should establish a detailed process for completing allotment assessments pursuant to the standards and guidelines and rangeland reform regulations. Such a process should outline a:</p> <p>Defensible and consistent process for doing rangeland health assessments, including appropriate assessment methodology (at a minimum, through use of BLM technical references as per BLM Handbook 4180-1) that details the proper intensity of assessments and density of observation points, appropriate indicators linked to the standards and guidelines, and the use of reference areas;</p> <p>Schedule for assessing allotments and implementing changes where necessary;</p> <p>Use of truly interdisciplinary teams to conduct assessments;</p> <p>Collection of sufficient quantitative and supplemental qualitative information adequate to initiate monitoring;</p> <p>Commitment to assess springs and riparian areas for PFC incorporating biotic and abiotic indicators (and to reassess where data becomes old or otherwise infirm).</p>
2150	2010	<p>Ensure that grazing conforms to the "Standards and Guidelines for Grazing Administration" by placing a priority on assessing areas within National Monument to see if they are meeting the standards and guidelines. Where standards and guidelines are not being met, BLM should take immediate action to rectify grazing management.</p>
2150	2010	<p>BLM should not allow water developments for the purpose of increasing livestock numbers.</p>
2150	2012	<p>Ranchers should be allowed some improvements for better managing grazing—water development, etc.</p>
2150	2021	<p>The BLM must ensure the Standards and Guidelines for grazing, for people and for all other uses are met and maintained. Effective implementation, monitoring, and enforcement are crucial.</p>
2150	2023	<p>I would like to emphasize the need to make clear to the public and the leasee/permittee what constitutes use of motorized vehicles for lease administration. In the real world, this may be interpreted by many operators to mean that they can go where they want on their allotments whenever and wherever, for any purpose, including hunting, etc. This hasn't gone unnoticed by the hunting public either.</p>
2150	2024	<p>Make sure that the ranchers do not overgraze the BLM lands.</p>
2150	2032	<p>Establish a plan with BLM staff and/or independent volunteers to monitor allotments annually to ensure that standards and guidelines established in grazing plans are being adhered to and are adequately protecting and restoring wildlife habitat.</p>
2150	2035	<p>The Montana Stockgrowers Association feels that the valuable contributions from landowners and livestock producers in the designated area and throughout Montana need to be emphasized. These landowners are good land stewards -- preserving historical sites and improving range conditions -- all without strict government oversight. For the past 26 years, when this stretch of the river was designated as wild and scenic, landowners are the main reason why we enjoy this area in the state it now exists.</p>
2150	2035	<p>An issue of concern is range improvements on BLM grazing allotments. Improvements such as fencing and water developments continue to show their importance in enhancing range conditions and better utilizing forage. It is important to point out that if these proven techniques used to improve range conditions were impeded, the range conditions, which have continually been worked to improve, may suffer.</p>
2150	2038	<p>Maintain cattle grazing as a traditional and beneficial use in the monument, including grazing in the riparian zones on public land in the river corridor. Managing cattle in the river area should be based on sound range science and not based on the opinion of a few faint-hearted floaters who find cattle to possess objectionable odors or draw flies or nip a few cottonwood seedlings. The multiple use mandate in force in the Wild and Scenic River portion of the monument must be honored and not be abrogated to please a small minority of people who believe cattle have no place on public land. And grazing management should not be manipulated to embrace that minority.</p>
2150	2039	<p>We have no problem with use of the area by cattle, so long as they are kept away from the camping areas and so long as they are not any more numerous than we experienced.</p>
2150	2046	<p>Cattle grazing has been part of the use of the Missouri River Breaks for many years and under the management of the BLM has been beneficial to the health of the rangeland, to the ranches, the communities and the schools.</p>
2150	2047	<p>Upland water development and maintenance is part of the key to maintaining these healthy rangelands.</p>

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2150	2047	There is a long history of grazing in the Monument area, as there has been in all the west. From the herds of buffalo, antelope, big horn sheep, elk and cattle the history isn't just in the past 200 years but much longer. To maintain healthy range, not only in the uplands, but also in the river corridor, managed grazing practices should continue.
2150	2048	Livestock grazing should continue as addressed by the recent watershed studies. We are, however, very concerned that an agenda exists (both BLM and environmental) to severely curtail or eliminate grazing within the corridor. Everything it seems is being held hostage by a very narrow strip identified as the riparian zone. This zone is currently being affected by water flows (or lack of) and ice, to a much greater extent than it is by livestock grazing. One only needs to look as far as the Judith or Yellowstone Rivers (naturally flowing) to see healthy riparian areas and cottonwood regeneration occurring simultaneously with livestock grazing. I also believe that these fences will cause unnecessary trampling (a cow's nature will lead her to travel down these fences to water) of the area immediately outside the enclosure, making a glaring contrast for which the rancher will be held accountable. During the ten-year period of the watershed agreement, I believe that this problem should be examined and an alternative solution be found. The fact that a majority of the range transects surveyed (also in watershed studies) in the area are in properly functioning condition should be noted in the monument RMP. For the management partnership between ranchers and BLM to remain viable, we must tell the positive side of our story. Ranching, recreation and healthy wildlife populations can all be maintained on a sustainable basis. We have already proven that here in the breaks.
2150	4244	Consider being conservative in offering grazing leases.
2150	4840	Allow 'natural inhabitants' domain over water and grazing areas. Those who may have interest in sharing these areas would do so at their own risk. Any loss of livestock would be strictly the responsibility of the one borrowing the area.
2150	5693	Explain in detail how grazing leases are put out for bid, monitored, number of livestock permitted, restrictions to protect riparian habitat, and detail this in the management plan.
2150	5694	I am opposed to any plan to restrict grazing.
2150	10008	Maintain cattle grazing as a traditional and beneficial use in the monument.
2150	10008	Maintain water development and current use practices in the monument without further restrictions or limitations on livestock watering or other beneficial uses of water.
2200	2	Do not make gross subsidies for mining.
2200	32	We don't need to use our public lands as energy resources.
2200	135	We believe it paramount that BLM consider mineral development and road development as integral parts of its RMP. In doing so, we believe that BLM should consider possible alternatives for access to the lands should critical mineral deposits be located in the confines of the particular monument. As the planning process goes forward, we hope that BLM will also give appropriate weight to the important role that the development of domestic mineral deposits plays in our national economy and national security.
2200	1678	Current mining rights should be honored but not renewed.
2200	1720	Oil and gas exploration and other extractive industries have no place in a national monument. Exclude all these industries from the monument.
2200	1743	The Breaks should not be open to development of mineral or fossil fuels.
2200	1863	Oil, gas and mineral development is inconsistent with the purposes of the monument and should be prohibited.
2200	1946	Ban oil, gas, and all mining activities.
2200	1978	Specify that the Monument is withdrawn from all new forms of mining, geothermal and oil and gas development.
2200	1998	Mining, oil and gas, electric power, and most of all, gravel pits should be allowed to be developed and transported.
2200	5694	I am opposed to any plan to restrict mining or mineral exploration.
2210	2	Allow no oil or gas development or exploration. Phase any existing out.
2210	42	Please see to it that this national monument is protected from the damaging activities of oil and gas drilling.

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2210	65	Do not exploit the area for oil/gas.
2210	124	Oil and gas drilling in adjacent roadless areas should be permanently banned.
2210	134	A prohibition from energy development must be enacted.
2210	144	Resource extraction, none whatsoever. This is not compatible with wild and scenic values.
2210	152	Oil drilling and gas drilling should be barred from the federally owned lands in the monument.
2210	169	As for gas and oil extraction, that should wait until technology gives us the means to drill obliquely. We don't need it now.
2210	171	Oil and gas drilling should be kept out of the monument.
2210	172	Prohibit the development of oil and gas leases within the monument.
2210	179	Oil and gas activity should be strongly discouraged. There is no better way to completely ruin the breaks than to allow oil and gas activities.
2210	198	Stop development of oil and gas resources that would harm the landscape and natural fauna.
2210	1678	There is plenty of additional land outside the monument.
2210	1695	Oil and gas development should be limited to current use with a management objective of phasing out such development within the monument.
2210	1734	No oil and gas development in the monument.
2210	1768	No new oil and gas activity should be allowed in the Breaks.
2210	1854	Eliminate all oil-gas activities within the Monument.
2210	1999	Gas exploration and transport should be allowed.
2210	2006	Keep oil and gas and roads out of this, our, treasure.
2210	2007	We don't want oil and gas drillers and roads ruining what should be left alone for the future America.
2210	2012	We support continued oil and gas development by companies with legitimate claims. The recent Wilderness Society (threatened) lawsuit to stop legitimate BLM-approved oil and gas development is an example of how radical environmentalist groups further their agenda—and why its important to maintain local control.
2210	2021	No new lease developments should occur until the RMP is adopted.
2210	2032	No new lease developments should occur until the RMP is adopted.
2210	2046	As to existing mineral leases, i.e. gas wells, development is important. These leases should be honored and gas exploration be allowed using guidelines that can actually be met.
2210	2047	Gas infrastructure already exists and minor disturbance is required for drilling. Further exploration should be allowed and development on existing leases should continue. I have seen firsthand the results of the pipeline on the south side of the river, and you would have to point it out to most people. An excellent job of reclamation was accomplished. As for new drilling, the impact is minimal and should continue.
2210	2048	The biggest single casualty of monument designation appears to be natural gas exploration and drilling. I believe this issue should be revisited. The existing leases should be honored, not just on paper, but out in the field. The infrastructure already exists (pipeline) so the impacts of drilling and producing gas will be minimal. I also believe new areas should be explored for their viability in this regard.
2210	2131	At the very least, big industry should not be allowed to exploit these lands for their own benefit, leaving the costs and burdens to the American public.
2210	3521	There are so many wilderness areas and fragile ecosystems in this country that are currently threatened by efforts to extract every last bit of fuel and/or mineral resources without regard for the impact of these actions.

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2210	10005	No new oil and gas development.
2211	117	From what I have learned, there is very little possibility of a sustainable amount of oil or gas in the monument. If the monument is to remain wild, gas and oil exploration should be banned. Any existing wells and pipelines no longer in use should be plugged and pipes, etc. should be removed.
2211	1768	The value of oil and gas to the local, state and national economies is, and always has been, nil.
2211	2032	Gas potential in the Bullwhacker area is small, and with no new leases being issued, gas development will eventually be phased out.
2211	2042	Significant potential exists for the discovery of minerals in the area, which could be extracted with minimal disturbance.
2211	3830	Please ensure that the land not be taken for granted in the exploration of natural fuel. In prohibiting energy exploration you have the opportunity to be one of the world's first leaders in the quest for alternative energy sources.
2212	91	To preserve and protect a wild historic landscape and then to develop and exploit it through issuance of gas and oil leases is to neglect and mismanage a national treasure.
2212	96	A designated wild land area should never have any oil, gas or mineral leases.
2212	140	I strongly believe that this area should be forever protected from oil and gas leasing. The short-term benefits from oil and gas production certainly do not outweigh the long-term benefits for quality recreation in the generations to come.
2212	174	Allow no oil and gas leasing or development.
2212	183	No more oil, gas or methane leases or drilling.
2212	1689	I don't understand why oil and gas exploration is always on our beautiful places.
2212	1725	Drilling now for gas or oil, even with current leaseholders, threatens the core of the monument lands and the natural values which should be a part of it.
2212	1786	Do not approve oil and gas leasing in the monument.
2213	1768	Presently there is a suit in federal district court challenging the validity of certain oil and gas leases in the monument. The suit alleges that the leases are invalid as a result of the BLM's failure to prepare an EIS prior to the issuance of the leases. If the judge rules that the leases are invalid, all post-NEPA leases in the monument should be revoked.
2213	2032	A full adjudication process should be performed to determine which leases are indeed valid and whether required actions, filings, and fees are in full compliance with the BLM Oil and Gas Handbook H3107-1. A detailed public record to document how leases were/are kept valid should be made available.
2214	178	RAC Subgroup management issue of concern is oil and gas development.
2214	184	Address the development of oil and gas leases.
2214	1767	What management decisions, land allocation decisions, management prescription decisions, leasing decisions and permitting decisions will be made in this analysis regarding mineral development and related activities? The following issues should be considered regarding mineral development and related activities in the Monument.
2214	2021	All lease-related roads should be closed to motorized public access.
2215	1767	The analysis should address the impacts to groundwater from mineral development. Water pollution, aquifer contamination, aquifer depletion, among other impacts, are all serious issues that must be fully considered in this analysis.
2215	1767	The analysis should address the water quality impacts associated with oil and gas leasing in the Monument and vicinity, including but not limited to, increased sedimentation, temperature modification, safe drinking water, impacts to impaired waterways, and wild and scenic river characteristics.

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2215	1767	The analysis should discuss the impacts associated with the disposal of produced water during mineral development. Soil erosion, impacts from discharge into waters of the United States, residual saline rich surface deposits, aquifer contamination are just a few of the potential impacts associated with the disposal of produced water. Please provide a thorough examination of these impacts.
2215	1767	Please disclose what amount of disturbed surface area will occur as a result of mineral development. Please explain whether any additional or expanded infrastructure at all will be required to develop minerals. What soils, water resources, wildlife, native plants, cultural resources, and other resources and values will be impacted by ground disturbing activities?
2215	1767	The Monument is a nationally significant recreation attraction. The impacts of oil and gas development will be felt throughout the Monument, not just surrounding the immediate areas of the potential well sites, but also in the most sensitive and remote roadless areas. Impacts to recreation should be thoroughly analyzed. Visual impacts and noise impacts should be considered.
2215	1767	Transportation and use of chemicals and other materials in the various phases of oil and gas exploration are a major potential vector for hazardous spills. Contingency plans for such spills should be provided. Analysis of the potential impacts such spills would have on the wildlife, cultural, aquatic, roadless and other values of the area. The BLM must disclose and discuss the impacts hazardous spills would have including, but not limited to impacts on vegetative communities, impacts on wildlife (specifically sensitive, threatened and endangered species), related fire and air pollution impact.
2215	1767	The analysis must fully consider the impacts of roads construction and use including among other things, increased erosion of extremely sensitive soils, increased vehicular emissions, wildlife habitat fragmentation, introduction of exotic and invasive plant species, noise pollution that will disturb both wildlife and the recreating public, slope stability, alteration of natural runoff, and soil compaction hindering reclamation.
2215	1767	The BLM should adequately consider the full scope of impacts associated with the development of pipeline corridors. Potential impacts that must be fully considered include the encroachment and spreading of exotic and invasive plant species, loss of and fragmentation of wildlife habitat, erosion, hazards associated with potential fire and explosion, and impacts associated with the abandonment of pipelines. The BLM should explain whether or not abandoned pipelines will be removed, or what impacts would be associated with removal or abandonment of unused pipelines. Measures to minimize or avoid erosion of the Monument's extremely susceptible soil regimes, such as varying depths for pipeline burial, should be analyzed.
2215	1767	We request a full analysis of impacts to air quality including impacts of emissions, flaring, and other factors. Activities associated with oil and gas exploration, development and continued operations can exacerbate air quality problems in this area and can affect the perceived wildness of the area.
2215	1767	Roads, other access routes and infrastructure associated with mineral development can have a negative affect on many resources, including wildlife, native plants, watersheds, aquatic species, soils, roadless characteristics, non-motorized recreation and other recreation, and cultural and historic resources. What is and what would be the Open Road Density in the Monument and its management (prescription) areas and cumulative effects analysis areas? In WSAs, roadless areas and other important areas? Could the road(s) and other potential access routes associated with mineral development be used for any illegal or environmentally destructive motorized use and off-road riding? What will stop motorized users from merely bypassing gates and signs? How will impacts be controlled or mitigated? It is imperative that both open road densities and total road densities be examined as to the potential effects they will have upon water quality as well as wildlife habitat. Please look for opportunities to perform road rehabilitation work and to repair other sediment sources caused by past management activities in the cumulative effects analysis area.
2215	1767	The BLM should analyze impacts to human health associated with this mineral development, including potential impacts to private landowners, workers, recreationists, and other persons downstream or downwind from the Monument and cumulative effects areas.
2215	1768	The fragmentation of habitat created by associated roads and pipelines, and the visual disruptions of development, detract significantly from the recreational and wildlife value of the area.
2215	2021	If threatened, endangered, or candidate species or special status species are discovered, or if evidence of habitat (e.g. prairie dog town) is found during permitting, development, or production activities, the BLM, USFWS, and FWP should be consulted and appropriate mitigation measures should be implemented to ensure no adverse impacts to these resources would occur.

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2215	2021	NEPA analysis should be used to determine onsite impacts of proposed development; new developments cannot commence until an analysis verifies validity examination.
2215	2021	Wells and pipelines should link to existing roads, with routes based on impact to monument resources rather than shortest distance.
2215	2032	Impacts from gas exploration and development should be addressed in a restoration plan.
2216	57	If there is to be an extractive industry presence, it must be closely monitored, and they must perform full reclamation after activity ceases.
2216	1767	The BLM must not allow any toxic chemicals to affect the surface. The drilling mud should be stored in tanks, and not in earthen pits. No wastewater should enter non-contaminated bodies of water, including above and sub-surface water sources.
2216	1767	Lands impacted by mineral development must be restored to a natural state once proposed activities are completed, using recontouring of slopes, revegetation, and removal of any toxic or other drilling waste. The environmental analysis must make assurances of reclamation prospects, based on empirical evidence with similar land types including soils, slope, aspect, and moisture regimes. If natural vegetation regeneration is proposed as a reclamation measures, then we would like to see resource analyses and statistical evaluations that support your decisions. If you prescribe different forms of regeneration such as planting, impacts to native species should be disclosed. Furthermore, any mineral development requirements should take into consideration permittees' past reclamation performance. Without such information, the public and decision maker can not determine if the company is not only willing to fully reclaim all disturbed areas, but it can not determine what level of commitment the companies have to reclamation activities. □ The issue of reclamation must be included in the economic analyses for this RMP and for future project-level decisions, and proof of bonding for reclamation should specify the amount of bond and the justification for that amount. We are very concerned that required reclamation will not be done in some instances and that permitted activities may not meet federal standards without strict oversight. The BLM should make sure that permittees post enough money to the BLM in their bond to totally reclaim the surface of the site. If reclamation is not guaranteed (e.g. if the money is dependent upon a budget being approved), then please do not approve mineral development proposals or leased. Approving mineral developments without being absolutely positive that sufficient money exists to reclaim the sites is irresponsible to the public. The BLM needs to insist that areas are reclaimed to the extent that everything works--environmentally--just like it did before -- and the BLM needs to develop strong prescriptions to ensure that the RMP is based on more than just lip service.
2216	1996	Fully mitigate gas leasing operations, as well as review, implementation, monitoring, and enforcement of BLM guidelines pertaining to lease validity.
2216	2010	BLM should address how it will handle energy leases and mining claims that were valid at the time the National Monument was established. BLM should perform a validity examination before claimants conduct surface disturbing activities greater than casual use.
2216	2021	Reclamation with native vegetation of all wells, pipelines, and roads created for oil and gas development should be undertaken and financed by the leaseholder as soon as the extractive activity ceases.
2216	2021	Proof of restoration funds must be presented to the BLM by the leaseholders before any new development can occur.
2216	2021	Full reclamation with native vegetation of all old well pads, roads, and pipelines, and other surface disturbance should be undertaken.
2216	2021	Removal of pressure stations and other buildings should be undertaken as soon as the extractive activity ceases.
2216	2021	Remote checking should be encouraged to minimize road use by the leaseholder.
2216	2021	All construction and facilities should be in conformance with VRM requirements.
2216	2021	Lease operators should be responsible for eliminating noxious weeds on well pads and pipeline corridors through the life of the wells and for five years post abandonment.
2216	2021	BLM must implement clear guidelines as to how reclamation will be implemented, monitored, and enforced. Relying on leaseholders to oversee themselves is not a viable option.
2216	2021	All equipment involved in the gas development and extraction process should be thoroughly cleaned, washed, and inspected by BLM personnel prior to use, and after any trips outside the area, to minimize the spread of noxious weeds.

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2216	2021	Paleontological and archeological field checks by BLM personnel or other authorized personnel should occur prior to disturbance as deemed appropriate by the BLM. Monitoring during surface-disturbing activities should be conducted by a BLM-approved archeologist or paleontologist, as deemed appropriate by the BLM. Paleontological or archeological resources discovered during activities should be reported immediately to the BLM.
2216	2032	Wells which fail to produce paying quantities should be plugged and abandoned and the leases terminated as required by law. Where development occurs, impacts should be mitigated. Roads leading to any active well should be limited to administrative use. Abandoned well sites should be restored to natural conditions and roads should be closed.
2217	1809	The Proclamation recognizes valid existing rights of oil and gas lease holders in the Monument. A full adjudication process should be performed to ensure that the leases are valid, and where development occurs, impacts should be well mitigated. Wells that fail to produce should be plugged and abandoned, and the leases terminated as required by law.
2217	1821	Regarding oil and gas development, I urge the BLM to follow procedures established in your Oil and Gas Handbook 3107-1, specifically those regulations regarding continuation, extension, exchange and renewal of leases. Leases should not be held for possible future use or speculation, and existing wells should be producing in paying quantities to hold the lease.
2217	1860	Oil and natural gas development that occurs within the Monument should be required to ensure that preexisting lease claims are valid. The impacts of any development should be closely monitored and fully mitigated with the intent to minimize damage to the area. Non-producing wells should be plugged, abandoned and their leases terminated as is consistent with the law.
2217	1864	Require strict adherence to the validity of all gas operations affecting leases within the Monument. Strictly monitor gas production from each well affecting leases within the Monument and give proper 60 day notice of leases where production has fallen off. Require operators to prove that they have paying quantities of gas. Require gas pipelines to be buried and to follow existing roads.

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2217	1996	<p>BLM needs to review whether VER's are present by reviewing files to ensure that required actions, filings, and fees are in full compliance with the BLM Oil and Gas Handbook H3107-1.</p> <p>A detailed public record to document how leases were/are kept valid should be made available.</p> <p>No new lease developments should occur until the Resource Management Plan is adopted.</p> <p>Proof of restoration funds must be presented to the BLM by the leaseholders before any new development can occur.</p> <p>NEPA analysis should be used to determine onsite impacts of proposed development; new developments cannot commence until an analysis verifies validity examination.</p> <p>BLM must implement clear guidelines as to how reclamation will be implemented, monitored, and enforced. Relying on leaseholders to oversee themselves is not a viable option.</p> <p>Full reclamation with native vegetation of all old well pads, roads, and pipelines, and other surface disturbance should be undertaken.</p> <p>Reclamation with native vegetation of all wells, pipelines, and roads created for oil and gas development should be undertaken and financed by the leaseholder as soon as the extractive activity ceases.</p> <p>Removal of pressure stations and other buildings should be undertaken as soon as the extractive activity ceases.</p> <p>All lease-related roads should be closed to motorized and mechanized public access.</p> <p>Wells and pipelines should link to existing roads, with routes based on impact to Monument resources rather than shortest distance.</p> <p>Remote checking should be encouraged to minimize road use by the leaseholder.</p> <p>All construction and facilities should be in conformance with Visual Resource Management requirements (see below).</p> <p>Paleontological and archeological field checks by BLM personnel or other authorized personnel should occur prior to disturbance as deemed appropriate by the BLM. Monitoring during surface-disturbing activities should be conducted by a BLM-approved archeologist or paleontologist, as deemed appropriate by the BLM. Paleontological or archeological resources discovered during activities should be reported immediately to the BLM.</p> <p>All equipment involved in the gas development and extraction process should be thoroughly cleaned, washed, and inspected by BLM personnel prior to use, and after any trips outside the area, to minimize the spread of noxious weeds.</p> <p>Lease operators should be responsible for eliminating noxious weeds on well pads and pipeline corridors through the life of the wells and for five years post abandonment.</p> <p>If threatened, endangered, or candidate species or special status species are discovered, or if evidence of habitat (e.g. prairie dog town) is found during permitting, development, or production activities, the BLM, USFWS, and FWP should be consulted and appropriate mitigation measures should be implemented to ensure no adverse impacts to these resources would occur.</p>
2217	2009	<p>There is a long history it seems of the BLM looking the other way or just being uninterested in properly managing, obeying the law when it comes to gas development in the area now encompassing the monument. Attachment C is one troubling example, a well in Blaine County (see letter).</p>
2217	2021	<p>BLM needs to review whether VER's are present by reviewing files to ensure that required actions, filings, and fees are in full compliance with the BLM Oil and Gas Handbook H3107-1.</p>
2217	2021	<p>Oil and gas leases now held in the monument should be adjudicated to ensure that they are indeed valid, and are kept valid according to the law.</p>
2217	2021	<p>There should be no new impacts to monument resources.</p>
2217	2021	<p>A detailed public record to document how leases were/are kept valid should be made available.</p>
2250	1	<p>We must limit impacts by reducing or limiting the number of users on the river.</p>

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2250	15	I would encourage you to ensure the proposed management plans for the Upper Missouri Breaks, first foremost protect and preserve the area from development.
2250	61	No houses, camps, floaters, guides for fishermen.
2250	117	Recreation should be allowed. Hunters, fishermen and floaters already seem to have spaces they use as campsites, continue to allow use of them.
2250	144	Develop a few trails to handle the majority of the people. It seems this is the way the BLM is going anyway.
2250	144	My concerns are motorized use, both watercraft, ORV and aircraft diminishing the wild and scenic values of the monument and quiet experience one goes there to enjoy.
2250	152	Maybe you can have some more nature trails next to some new interpretive centers in the monument with info like the geology of the region.
2250	153	Region 6 periodically puts out an information sheet for license dealers concerning wildlife and fisheries. Havre BLM will be put on the mailing list to receive this information. BLM and the local Mt F,W&P office and local sporting goods dealers are putting together materials for the recreating public (mostly hunters). We had a meeting in January of 2001 and again in February of 2002 and will be updating a map with land status and other information for use at our offices and some locations in town that serve most of the public. Gretchen Gabriel and Lori Federspiel at Havre BLM and Shane Reno at Mt F,W&P are the primary persons coordinating this effort.
2250	164	Emphasize nonmotorized travel. Other types of travel "use up" the land so that it is no longer able to provide wildlife habitat or a wilderness experience, peace, and solitude for future visitors. Nonmotorized travel minimizes users' impact on the land so that future generations of people continue to enjoy the area and wildlife can prosper.
2250	166	We should capitalize on the educational opportunities of this region. People want to see an area similar to what Lewis and Clark experienced, not a "wally world" of Montana.
2250	174	Do not overdevelop trails and facilities.

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2250	178	<p>Discussions among RAC Subgroup persons wanting to see an equitable access system developed have identified the following features or elements of a desired system:</p> <ol style="list-style-type: none"> 1. The first step is creation of a UMBNM internet site. It should be separate from the Lewistown BLM DO site, but can be connected. The site should include a map (or maps) and pertinent information about use of the monument (much of what is included in informational brochures). 2. The internet site should include the graph that shows distribution of use over the May-Sept. use season. This will help users plan trips for times that use is low if they want to avoid heavy use periods (maximize solitude, less crowding at campgrounds, etc.) or possible to choose to travel the river when others are present. 3. A page on the site should list the outfitters authorized to do business in the monument, perhaps including a statement as to types of services they provide (e.g. rent canoes, shuttle cars, large boat trips, etc.) and their address and phone number. 4. As use levels increase, information should be provided on how to apply for a use permit. An allocation model would be developed that "operates" or is based on user permit applications. Actual allocation of permits would be based on one of three types of allocation models: A) first come-first served; b) lottery or drawing from the pile of applications submitted by a particular date; c) a lottery system constrained by proportion of demand among types of users. 5. Based on physical and other characteristics of the river corridor, the monument should be divided into three parts or segments. The allocation process would be implemented only when use in a segment indicates a need to do so. Some parts of the model/process should be implemented in CY2003, however. 6. As BLM receives applications, the total number of applications would be displayed on a calendar for each day of the summer season (on a part of the internet site). It is likely that potential users would adjust their own schedule when they see numbers reaching a crowding level. This might delay any need to actually allocate use for several years. 7. Before users are refused a permit, they should be given an opportunity to change their application to a date where use levels are "below capacity." 8. Applicants would be required to pay a fee when their application is submitted. This would reduce the tendency to flood BLM with applications in an attempt to "beat the system." 9. Permits would be issued to the user or group leader. If someone wanted an outfitter to handle their paperwork/application process, they could designate that outfitter in their application. 10. The system should include sufficient flexibility that competition between outfitters occurs. This will allow the better outfitters to increase their business, and will not require that BLM keep slipshod or less competent outfitters in business. 11. It is assumed that use levels over time will be adjusted based on monitoring of "key indicators." Protection of the values that led to establishment of the monument is assumed. If adjustments in how use occurs or in the levels of use are not made, public pressure will likely lead to changes in management (possibly a different agency), or legislation that specifically constrains use.
2250	183	Provide educational literature to the public to help protect this special place.
2250	184	National monuments are to be preserved for their natural and historical resources, not to be utilized as recreational areas to the point of disintegration by human toys and therefore no longer a valuable and beautiful wilderness for the proliferation of indigenous wildlife and the enjoyment of all people.
2250	1706	Recreation, except in the form of different types of "tours" should be forbidden.
2250	1714	Recreational use must be controlled and directed so that the remote and spectacular portions of this area remain undeveloped and undamaged.
2250	1717	Interpretation should be the role of the agency, not commercial entities. I have been subjected to some absolutely awful interpretation by commercial permittees, so can heartily recommend that BLM take the lead here. I'd like to see well-trained agency interpreters leading short hikes and canoe trips like the NPS does in the parks.
2250	1742	We sincerely request that the subjects of off-road vehicle use and the subject of the use of powered boats will be major areas of study and comment in the draft plan.

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2250	1745	Make people walk, ride, or paddle in, and thus limit their impact on the area and on others' enjoyment of the area.
2250	1748	The BLM should provide opportunities for visitor exploration and discovery in the undeveloped primitive setting that the monument offers. The monument management plan must describe how the BLM intends to provide for the visitor experience while protecting the monument's resources. The BLM should be specific in identifying uses that will be acceptable/allowable.
2250	1748	The recreational collection of objects should be prohibited as part of the management plan.
2250	1761	The river is under constant change and use, motorized craft both water and ORV use will become under great pressure for travel in the river corridor. This area of wild and scenic use must be protected to restore a natural and quality experience to all the public citizens who wish for a quiet, primitive trip into this unspoiled area.
2250	1790	Impose equitable limits on use by all groups and individuals as required to protect the core values of this area.
2250	1794	Unfortunately, I am convinced that eventually there will be a need to establish some sort of permit system to limit the number of people on the river at a time. This will be needed to prevent excessive impacts on the ecosystem and on camping and hiking areas, and to maintain the feeling of wild solitude. When such a permit system is established the permits must be issued to people, not to outfitters. The people then may hire guides if they wish. Note that the establishment of a limited permit system will increase the pressure to lengthen the floating season. This makes it more imperative that jet boats, etc. not be allowed in what is now considered off-season.
2250	1913	Development within the monument should be limited, and recreational activities that can be carried out at other locations should not be allowed within the monument. Similarly, visitor services should be located outside the monument in nearby communities.
2250	1976	The principles of Recreation Opportunity Spectrum (ROS) should be considered for the entire Lewis and Clark trail, keeping in mind the Monument should be at the most primitive end of the scale when considering all aspects of management and development. We believe that recreational facilities should be confined to road heads, with the possible exception of the primitive toilets that now exist. Signing, other than at road heads, should be kept to an absolute minimum. Interpretation and necessary information should be done with written material that the visitor brings with them.
2250	1976	Monitoring of recreation use is important. The concept of Limits of Acceptable Change (LAC) and sustainability should be implemented.
2250	1997	As far as actual visitation to western public lands, the vocal minority that continually chants the solitude mantra, are vastly outnumbered, perhaps a thousand to one, by other Americans who are looking for a different experience, be that historic, interpretive, scenic, or just camping with their families. Please be fair to the majority of Americans when crafting the RMP and the Monument Travel Plan.
2250	2001	The integrity of the resource must be given priority in planning and construction of any trails; visitors must assume responsibility for their actions.
2250	2010	The RMP assess recreational use of the wild and scenic river segments within the National Monument and determine how much use and access the area can sustain without adverse impact to the river's outstandingly remarkable values.
2250	2010	Rock climbing should not be allowed where it would harm archeological, paleontological, biological or other resources.
2250	2010	Trails and recreation facilities should not be placed in riparian areas.
2250	3521	The harmful effects of increased tourist and recreational uses must also be regulated so that wilderness areas will not become another commercial theme park.
2251	1	The solution lies in education programs on leave no trace camping.
2251	67	The monument area strongly needs additional campgrounds in the shade, especially with the increased river travel.
2251	68	There is a need for more campgrounds with shaded areas and more maintenance.
2251	115	Congested camping is bound to happen and you will probably need to permit visitors.
2251	117	Since many people will be floating the river during the Lewis and Clark celebration, there should be a few established campgrounds. These should include the basics -- toilets and a few fire rings or something for a campfire.

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2251	144	Facilities. I remember the days when you floated into Eagle Creek Campground and if there were 2 other groups, it was crowded. There needs to be some plan to accommodate the increased numbers but still maintain the "experience." Two ways to go, develop more sites to spread people out or increase concentration in the few existing sites. I prefer the 2nd option, develop Eagle Creek, Hole-in-the-Wall, etc. to handle larger numbers effectively, thus keeping most of the river primitive. This may also apply to trails/hiking.
2251	171	Recreation needs to be managed and not just by tiny exclosures. I think some kind of mix of designated sites and choice could be implemented, but a permit system may be necessary in the busiest months. When we were at Eagle Creek last year there were over 50 people there. Party size should be limited to 15.
2251	174	Consider designated-assigned permitted camp areas along the river, primitive with only a fire pit and a pit toilet like the Smith River.
2251	182	Last year I noticed especially that an outfitter can motor ahead of the floaters and pick the best spots for camping, then get set up to greet his floaters. One created an unpleasant incident for me which I reported to BLM without getting a response.
2251	183	Improve public access campgrounds.
2251	1702	The one campground that was fenced didn't have an outhouse so human feces was behind every tree. Come on you guys, you know better than this.
2251	1706	Remove camping areas along the river.
2251	1720	Campgrounds should be organized in the uplands for the motorists and by the river for the canoeists. They should include toilet facilities to protect the land.
2251	1748	Overnight camping should be managed to prevent impacts to resources and camping should be prohibited in sensitive areas.
2251	1794	Except perhaps on the external boundaries of the monument there should be no developed campgrounds. Camping in this last remaining wild section of the L&C Trail should be primitive.
2251	1809	Developed campgrounds should be kept in the external boundaries of the Monument. Camping within the Monument should be kept primitive.
2251	1836	Aside from appropriate toilet placement, do not make campgrounds or structures. Encourage dispersed light-on-the-land camping.
2251	1839	We had not been on the river for two or three years and were pleasantly surprised at the difference in the campgrounds at Hole in the Wall and Slaughter River. The shelters were well designed and placed and the toilets were a great improvement over the old, falling-down "privies" that we had seen earlier. The maintenance was good and the campers seem to be taking care of the new facilities.
2251	1843	Campgrounds; as already discussed there are to be four levels of sites. 1. Launching and takeout sites with camping spots and improvements and accessible by road; 2. Improved sites with vault toilets, shelters and fire rings; 3. Sites with only fire rings; and 4. No improvements at all.
2251	1864	Identify areas where camping is not permitted because of fragile soils, archeological sites, private land or historic features. Create adequate maps which identify camping areas. Developed campsites should be accessible from the river corridor and segregated from cattle.
2251	1892	Since it seems the most heavily impacted area is the white cliffs section, camping should either be limited to improved sites (with bathrooms), or campers should be required to carry portable toilets. I also don't think fires should be allowed at unimproved sites unless floaters are willing to carry a firepan, and deal with their cinders appropriately. I believe the lower section should be left completely undeveloped. Require toilets, firepans etc. for all floaters on this section and enforce responsible and low impact camping.
2251	1896	Do not hesitate to limit the number of sites that will be impacted by the inevitable increase of traffic even though that may mean crowding of transients in a few areas if needed to preserve the wild values of the Monument area as a whole.
2251	1897	In an attempt to maintain good floater, resident relations, there should be signs on both sides of the river indicating where private lands begin and where public lands begin. Numerous small campsites, with pit toilets, and a few large campsites also with pit toilets would also diminish the problem of floaters not knowing where they are and camping on private land. Lands leased for grazing should still be available to the public owner for camping.

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| 2251 | 1947 | As a rancher my concerns for river management are: 1. Floaters must adhere to the same rules for campsite-area grasses and river banks as livestock do. Refer to BLM watershed study for specific rules; 2. More river patrols are needed to ensure floaters are camped where they are supposed to be. Limit number of campers on BLM campsites. |
| 2251 | 1972 | Campgrounds should be located next to waters edge, due to fire danger. They should be built on existing BLM land. They could be built and fenced with local rustic but attractive materials that would not restrict or cut off livestock or large wildlife from watering. Campgrounds could include landscaping of local vegetation. |
| 2251 | 1985 | Though I dislike the idea of the improved campsites in wilderness areas, the reality is that people are coming and it is a lot better to concentrate them in those campsites where hygiene can be managed. |
| 2251 | 1988 | Campsites should have larger signs more easily visible from further upriver than they currently are. By the time we identified some of them, we were either too far across the river from them or too close in to shore to buck the current to get to them. You have to lead your turns in a canoe by quite a bit to make your landfall when you're floating down river at even a mere 3½ miles per hour. |
| 2251 | 1996 | <p>Specific Management Recommendations to Protect Quality Camping Experiences:</p> <p>Zones should be categorized as follows:</p> <p>Zone 1 Campsites: Developed Public Access. These sites are situated at the major existing access points. Campsites should still contain minimal infrastructure, with only potable water pumps, fire pits, picnic tables, trash containers, and pit toilet facilities. No additional development, such as RV hook-ups or commercial facilities should be constructed. Zone 1 sites should be the only areas where motorized camping is allowed. Light pollution (see section below) should be minimized.</p> <p>Zone 2 Campsites: Developed Boat Camp. These sites should only be in areas of heavy use, and should still only consist of a firepit and vault toilet. Trash should be packed out by the permit holder.</p> <p>Zone 3 Campsites: Primitive Boat Camp. These sites should have no development, aside from a designation as a boat camp. They should be designated in areas of heavy use in order to localize impacts. All trash and human waste must be carried out by the permit holder.</p> <p>Zone 4 Campsites: Undeveloped Public Lands. This zone should be designated to areas that experience light use and can therefore sustain random camping throughout the zone. "No-trace" camping should be mandatory and all trash and human waste must be carried out by the permit holder. All off-river lands should be designated Zone 4 areas.</p> <p>The BLM should implement a system of monitoring to ensure that habitats in and around camping areas are not becoming overused and degraded from firewood collection, trash, and human waste. Protection of these habitats is a priority and the BLM should implement restrictions and/or seasonal closures if needed.</p> <p>The BLM should educate visitors about the importance of "no-trace" camping through interpretation.</p> <p>The BLM should manage camping with the main priority being to protect Monument resources. BLM should delineate what level and type of camping is in accordance with this priority.</p> <p>Maps and discreet signs in accordance with VRM principles should be available for visitors to locate designated campsites.</p> <p>The BLM should decide whether campfires are appropriate, based on the impact to the habitat and the potential fire danger.</p> |
| 2251 | 1996 | Group size limits should be imposed in sensitive riparian areas, or the areas should be closed or seasonally restricted. |
| 2251 | 2005 | A permit system should be used in busy times to not overload camp areas. |
| 2251 | 2010 | BLM should manage overnight camping to prevent impacts to resources. BLM should consider prohibiting camping in sensitive areas or limiting camping to designated sites. |
| 2251 | 2012 | How would you manage congested camping? Quit advertising (with tax dollars) and encouraging more visitors. At least advertise truthfully mentioning: hundreds of floaters, crowded campgrounds, frequent unfavorable weather (hot, cold, hail, wind, etc.), slow floats (no rapids), muddy water, insects, snakes, few trees. Encourage more off-season floating. |

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2251	2039	We urge that your plan preserve the wild character of the river by allowing no more development of any facilities except perhaps some more campgrounds. The campgrounds should remain primitive with only vault toilets provided. We see no need for picnic tables or fireplaces. We would, however, suggest a few more camping areas with toilets. And those areas should all be fenced to keep out cows, like is done at some of the sites.
2252	61	I would agree to a regulated, reasonable number of float trips for the public but no permanent camping facilities.
2252	64	The size of float parties, guided or not, should be restricted to no more than ten people.
2252	64	If floaters put too much pressure on campsites or fish and wildlife resources they should be permitted like the Smith River is.
2252	79	The public and private lands must be identified along the river and along the top where the public lands meet the private land.
2252	102	The day may come when, in order to preserve the essential qualities and the isolated remoteness of the river, some sort of permit system may have to be adopted--at least for the busiest times of the summer.
2252	117	It may be necessary to place a limit on the number of floaters per day. It should be by special drawing. Outfitters names should be included in the drawing. They should be allowed a stated number of floaters (e.g. if their name is chosen they would be allowed xxx floaters, that day).
2252	124	Last year the increased traffic on the river was very noticeable. River use needs to be actively managed, including instituting a permit system. We float many other rivers with permits and are glad they are in place on every one of them, even though we may not be able to make the trip as often as we would like.
2252	170	Apparently the current permitting process discourages short scenic trips between Coal Banks Landing and the white cliffs. It should be possible for the BLM to arrange the process to take into consideration short trips for those whose infirmities, budget, or work schedule do not permit several days commitment.
2252	1713	Create and maintain limited but functional access points, with emphasis on serving the general public and not commercial outfitters. On the water, attempt to meter a controlled flow of smaller parties down the river. Assure that they are well-educated on the rules of the river before they enter the water.
2252	1772	Recommend that float trips only be authorized.
2252	1794	The increasing use of motorized vehicles in wild areas (land and water) is making it so only the most fit and skilled can get beyond the motors to experience the quiet and peaceful wild. Places like the Missouri River which do not require much skill, strength, or endurance must be saved so the unskilled, the young, the old, and the infirm and disabled can also experience the quiet and peaceful wild. Do not deny them this opportunity.
2252	1794	Floating is an ideal mode of wilderness travel for unskilled and disabled people. Allow them the opportunity for a quiet wild experience they might not be able to get hiking. There may be people who are unable to float the river, but providing for motorized access for all is allowing access for none. The quiet solitude they seek would be gone for all.
2252	1795	Nothing can compare to drifting silently down this river in a canoe or raft.
2252	1799	I was pleased to have only encountered 2 motorized watercraft in 149 miles, one of which was patrolling for safety (Fish and Game?). Please continue to strive to maintain the current quiet and primitive character of the Wild and Scenic segment of the Missouri River.
2252	1836	Permits to float may become necessary as usage increases. Increasing use will affect both the landscape as well as the users experience. After all, most floaters go to the Missouri for the solitude and natural landscape. If it becomes necessary to limit numbers by a permitting process, those permits should only be available to individuals, not outfitters. Individuals always have the option to hire an outfitter.
2252	1874	The number of visitors on the river per day must be controlled to prevent overcrowding on the water and in the campgrounds.
2252	1976	All river floaters, as well as overnight campers at road heads, should be required to register at convenient locations.
2252	1985	The RMP should preserve and restore the Monument's wild, undeveloped character, which should include a strategy to limit the number of large groups on the river.

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2252	1988	On a recent self-guided canoe trip on the UMR, some of the guided tours had entirely too many people in one group. One group had twenty campers in it. This tends to result in immediate saturation of the best camping spots, consigning the rest of us to whatever's left another hour of paddling down the river. You need to develop some kind of scheduling or reservation scheme to at least alert non-guided canoeists as to what spots are already taken. It would sure help us soloists to develop a pacing plan of our own that doesn't put one into camp totally exhausted and in near darkness.
2252	1995	There should be no float allocation made to service providers such as outfitters or boat rental businesses. The internet is available to establish an allocation system that is fair and equitable for everyone. If limits are necessary on use, any allocation should be made directly to the potential user. If he or she then wishes to hire an outfitter or rent a boat, that can be done.
2252	2012	Some floaters litter, start fires, spread weeds, and vandalize the sandstone formations (carving initials and rolling boulders off cliffs); yet the river has not been closed. We rarely float the river, but used to occasionally enjoy an afternoon by the river near the Hole in the Wall (just a few miles from home)—until we were unexpectedly locked out by BLM. I object to the favoritism given to floaters who want a "wilderness experience" when it takes away my right to drive to the river for a few hours of relaxation, fishing or a picnic near the Hole in the Wall (or other areas with vehicle access). Do not turn these places into "wilderness" for floaters. Wildlife doesn't mind sharing the area any more than it minds the constant flow of floaters.
2252	2012	Sometimes canoes are so thick, I wonder if wildlife is able to drink in the river undisturbed. Since few areas are accessed by vehicle, wildlife can usually go a short distance upstream or downstream to avoid the people who arrived in those vehicles.
2252	2012	Make certain floaters know what's private land and what's Monument, so they can avoid trespass.
2252	2024	Clearly mark the boundaries on the river between BLM lands and private property.
2252	2038	Under no circumstances should the BLM develop a boater/floater allocation system.
2252	2039	You might want to consider a permit system for river trips to limit the pressure on the land and water. The Missouri Breaks is a unique and valuable resource and every effort should be made to preserve it in its wild condition for future generations.
2252	2048	I am opposed to an allocation system. I don't believe we are seeing the numbers yet to justify it.
2252	10008	We don't want a boater/floater allocation system.
2253	51	I believe having motorization on the river ruins much of the history and experience that runs deep in the river's natural feel.
2253	52	Motorized vehicles and so-called personal watercraft can do a great deal of damage, unless they are under strict control.
2253	57	Rivers and their natural pathways should be free of machines and other loud, blatantly artificial signs of human industry.
2253	59	Intrusive motorized travel (esp. jet skis) must be limited.
2253	64	Jet skis must be prohibited. Motor boats should be restricted to no-wake all year long and be prohibited in sensitive areas.
2253	86	Please adopt a river plan to enforce the no-wake rule all year.
2253	91	The river corridor must be monitored in order that pollution from high-speed watercraft is kept to a minimum.
2253	92	The current summer no-wake rule should be in effect 12 months a year to preserve the natural quiet of the river corridor. Motors should be required to be 4-stroke to limit water and noise pollution.
2253	92	PWC should not be allowed on the Missouri River.
2253	118	No jet skiing or other such recreational pursuits (surfboarding, etc.) and enforce the high speed motorcraft from this river before Memorial Day and after Labor Day. Encourage nonmotorized use of this river—canoes are ideal.
2253	122	Don't allow uncontrolled travel and speeding at any time by motorized crafts on the water creating wave erosion of shore lines.

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2253	124	Motorized boats should not be allowed at all in the monument. The drone of motorboats has spoiled the peacefulness of our floats for hours at a time. If a complete ban is impractical, personal watercraft should at least be prohibited. All other boats should be required to observe a no wake speed all year long.
2253	125	I do not think that jet skis are at all compatible with the use of the river for their recreation purposes. I believe that no wake speeds need to be maintained all year long.
2253	149	You should reconsider your boat motor policy. The only boats/canoes we observed with motors, the whole time we were out, were BLM canoes. Why can't the BLM set a different/better example?
2253	154	This monument must be managed for its undisturbed natural values, including wildlife, and allowing speeding motorized boats and jet skis is contrary and detrimental to the designated management concepts.
2253	156	Motorized river traffic should be limited by sound and/or speed.
2253	157	Limit horsepower of motorboats. Ban any jet skis. They are of no use.
2253	164	One single person on a jet ski can destroy this experience for the majority. In addition, jet skis have been shown to discharge gas directly into the water, and they use two stroke engines, which are notorious for their emissions problems.
2253	167	Phase out motors on the wild and scenic river corridor, especially on the wild stretch below the Judith.
2253	171	Motorized use on the river should be discontinued.
2253	172	Prohibit jet skis and require other motorized boats to observe no-wake speeds all year long.
2253	174	Prohibit all motor boats on the Missouri River within the monument.
2253	179	Motorboats ruin the river experience. We always see motorboats, even when not allowed. Current regulations are completely ignored by some motor boat owners. We have never encountered jet skis on the river and I hope we never do. Jet skis should be banned forever.
2253	183	No jet skis or motorboats on the river.
2253	185	I've seen large motorcraft going up and down the Missouri River and the damage and erosion that they do to the banks along the river. They also disturb the wildlife and nesting birds and animals.
2253	197	No personal watercraft on the river and severely restrict other motorized boats (number and speed). My last trip by canoe on the Missouri was tremendously diminished by motor boats.
2253	1681	Retain floating and other watercraft uses on the Missouri River. The use of motors should be retained, however, with some restrictions. Perhaps regulations limiting the size of motors as well as the size of pontoon boats could be established. Motors could be used on float boats, canoes, rafts, row boats and platoon boats only. Personal watercraft and other speed boats should be restricted. Boats should not be permitted to speed upstream except for an emergency.
2253	1689	Motorized boats of any kind should be kept off portions of the river. There should be authority to fine and punish those not following the law.
2253	1695	With the following exceptions I recommend the Agency employ the 1999 recommendations of the Lewistown RAC, which are a continuation of the preceding policies of the Wild and Scenic Missouri designation. This includes the current seasonal closures for no-wake boating on the river. 1) Engines on motor boats being used on the river during the fall and spring motorized season should be limited to 80 bhp or less; 2) commercial operators on the river should be restricted to no-wake boating year round; 3) The two areas of the river currently open to motorized boating in the summer months should be eliminated so the no-wake rule in place between Memorial Day and Labor Day is consistent for the whole river. The agency should write some flexibility into its management policy in this area to allow for further restricting motorized boating on the river should overland access to adjacent public lands improve in the future. A major justification for maintaining motorized boating on the river within the monument is to compensate for lack of overland public access to adjacent lands.
2253	1699	Please hold boats to no wake.
2253	1703	Please prohibit motorized watercraft.
2253	1704	No motorized watercraft in the area.

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| 2253 | 1705 | I'm writing in support of eliminating motorized water transportation on all areas of the Missouri River that are designated wild and scenic. I have floated stretches of the Missouri and think that we should preserve at least this portion of the river in its natural state. |
| 2253 | 1707 | Jet boats and jet skiing on the Missouri in the Monument should be prohibited. Motorized boats should be required to limit their speed to the no-wake rule throughout the year. Operators of motorized boats are not adhering to this rule during spring and fall seasons. They are disrupting non-motorized river travel and upsetting hunting and traditional recreation. This must be stopped. All motorized watercraft should be barred from that part of the Missouri classified in 1977 as Wild and Scenic. |
| 2253 | 1708 | Now is your chance to create a section of the poor, despoiled Missouri river and turn it into a national monument where city folks, etc. can drift down a river without motorized monsters (jet skis, etc.) disturbing the serenity of wild hunks of landscape. |
| 2253 | 1710 | Limit motorized recreation and protect roadless lands. |
| 2253 | 1713 | Put an immediate stop to the growing use of the Wild and Scenic Missouri segment by noisy and polluting watercraft. Power boaters already have access to the massive Fort Peck Reservoir. |
| 2253 | 1714 | Motorized use of the river should also be strictly controlled. No motorized boats should be allowed in the portion of the river that was designated Wild and Scenic in 1977. I am not against motorized boating, per se, but I am opposed to speeding, noisy craft buzzing up and down the river. I believe that a no-wake policy should be enforced throughout the remaining river areas year round. |
| 2253 | 1715 | My wife and I live on the Missouri River about 5 miles south of Great Falls. One of the reasons we had as a basis of living here was solitude. Five years ago we still enjoyed solitude and silence at home. With the advent of personal water vehicles and jet boats, both of those characteristics are gone forever. People who use the river for this sport are not evil, nor do they intend to rob everyone along the river of peace and tranquility, it's just that stealing peace, tranquility, serenity, and silence is a natural by-product of their enjoying their sport. The Missouri Breaks must be protected against this type of usage, otherwise commercial jet boats are inevitable. It's just human nature. |
| 2253 | 1716 | Keep motorized watercraft out of the Wild and Scenic section of the Missouri River. I know the difference between canoeing a river that is free from motorboats and jet skis, and one that is plagued with them. When the river is free of motorized traffic, we enjoy the birds and wildlife, and the experience is wonderful. It does not take many motorboats to remove the birds and totally change the experience for floaters and canoeists. |
| 2253 | 1717 | The entire W&SR corridor should be closed to all motorized use yearlong, including motorized boats. |
| 2253 | 1720 | It has been a canoeing river for years and part of the attraction is the quiet solitude. Power boats will eliminate the trip for canoeists by making it noisy and dangerous (boat wakes). |
| 2253 | 1721 | We deserve to have the river, which is the core of the monument, quiet and calm. Visitors should have the opportunity to experience the wild Missouri as Lewis and Clark did, not as a loud, hectic, high-speed throughway. |
| 2253 | 1726 | Do not allow motorized travel on the river, or if you must allow some, limit the horsepower as is done in Glacier Park. |
| 2253 | 1729 | Please maintain the quiet character of the wild and scenic segment of the Missouri River by prohibiting motorized watercraft. |
| 2253 | 1732 | Restrict, as much as possible, the use of motorized vehicles, especially on the river itself. |
| 2253 | 1735 | All motorized river traffic should be prohibited save enforcement and emergency craft. |
| 2253 | 1737 | Maintain the quiet character of the river and the river corridor. Prohibit motorized use on the portion that is a wild and scenic river. |
| 2253 | 1739 | Public use of jet boats on the river should be halted because of their noise and interference with the original kinds of travel and recreation. |
| 2253 | 1740 | We met only 1 motorized boat and it was observing the no-wake rule. I believe that should be a year-round rule and that no jet skis should ever be permitted. |
| 2253 | 1742 | Powered boats should be allowed to operate only at no-wake speeds in any stretch where soil erosion could occur, and in any stretch where nesting wildlife could be adversely affected. |

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2253	1743	Only small personal boats or craft with a maximum size motor of 50 hp should be allowed on the river for purposes of hunting, fishing, and sight seeing, outside of the wild and scenic portions of the Missouri River.
2253	1744	The no-wake rule for boats should be enforced all year long. Jet boats, jet skis (personal water craft) and speed boats should be prohibited.
2253	1747	There should be a ban on personal as well as commercial motorized water travel.
2253	1748	The BLM should prohibit personal water craft (jet skis) and require other motorized boats to observe no-wake speeds all year long in order to prevent river bank erosion and prevent disturbance to wildlife.
2253	1755	Please eliminate motorized traffic in the Missouri Breaks Wild and Scenic River corridor.
2253	1760	The use of motorized boats (including jet boats) has increased and this fact adds a request to curtail motors in the river.
2253	1763	The most moving and spiritual part of our float trip was the utter silence. I had forgotten such silence still existed on earth. Please, no motor boats.
2253	1764	Enduring the whine of motorized activity is not compatible with "wild." Nor is it particularly "scenic" to watch jet boats or personal watercraft (a euphemism if ever there was one) move up and down the river (and up and down, and up and ...).
2253	1765	If people want to use this area they would be perfectly free to float or to raft the area, to canoe or kayak the area, but to allow it so the use of motorized water craft will, inevitably, destroy some of the values that are already present.
2253	1766	I hope that all motorized vehicles will be prohibited. It should be as natural as possible.
2253	1770	The BLM should make a farsighted decision to curtail motors on the river now, or the river is certain to become another high speed, motorized throughway.
2253	1770	Motorized use in the Missouri Breaks, as in other outdoor areas, is growing and unless a decision to curtail motors on the river and on the land surrounding it is made now, the river will certainly become just another motorized playground. Can't we protect at least 149 miles of a 2700 mile river as a quiet and primitive place, as it was when Lewis and Clark first saw it?
2253	1780	Maintain the quiet character of the river and the river corridor; prohibit motorized use on the portion that is a Wild and Scenic River.
2253	1781	Maintain the current quiet, primitive character of the wild and scenic segment of the Missouri River by prohibiting motorized watercraft.
2253	1784	We just returned from a canoe trip through the white cliffs area of the Missouri. We would like to encourage you to consider a no-motor rule to preserve the quiet and primitive character of the river.
2253	1790	Recent increases in use, particularly by power boats, have intruded on our ability to encounter this landscape in a primitive, quiet and reflective manner and have diminished some of its core value.
2253	1790	Eliminate powerboat use wherever and whenever legally possible.
2253	1794	Motorized travel--both land and water--is one of the major threats to the character of the area. Consider an arbitrary ten-mile section of the river with about 120 people (maybe in groups of half a dozen family or friends) paddling and floating quietly in non-motorized boats. (This would correspond to 200 or 300 people per day launching from a river access point.) With this high density the groups would still be half a mile apart on average. They would be aware of other groups and would pass or be passed occasionally, but all could experience the quiet, wild, solitude. Add one or two jet boats or PWCs and no one would experience any solitude on the ten-mile stretch. Motor boats should not be allowed on the Wild and Scenic sections of the river any time of year--especially boats going any faster than no-wake speed. Currently motor boats are allowed between Labor Day and Memorial Day without a no-wake limit. But with increasing numbers of people wanting a wild Missouri experience there has been, and will be more "off season" demand. As the above illustration demonstrates a few motors can destroy the experience for many floaters.
2253	1795	Please let us have this stretch of river free of motorboats, so Americans can escape to a place of peace and quiet.
2253	1796	Please do not allow motorized craft to be used on the stretch of the beautiful Missouri River designated for the monument. It is absolutely devastating to wildlife and the scenic beauty.

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2253	1800	On the 149-mile portion of the river designated as Wild and Scenic, use of motorized water craft should be prohibited.
2253	1803	Closely manage all motorized use on the river & prohibit motors except for administration & mgt.
2253	1804	It is not a place where motors are welcome, by humans or critters either one. Motor boats overwhelm the sounds of the natural world on the river -- the sounds of birds, fish jumping, beavers slapping tails, even the simple drip of the water from a paddle.
2253	1805	Maintain the quiet character of the river and the river corridor; prohibit motorized use on the portion that is a Wild and Scenic River.
2253	1806	The river itself is in danger of being overrun by motorized craft in the wild and scenic stretch particularly. Too many rivers, including the Kootenai on which I live have become a nightmare of traffic, degrading the trout fishing and destroying any peaceful quiet time one would like to have.
2253	1807	There should be no power boats of any kind nor any off road vehicle activity.
2253	1808	Being a canoeist, I know nothing can spoil a quiet time on the water more than motorized watercraft. Please prohibit motorized crafts on the wild and Scenic segment of the Missouri.
2253	1809	Motor boats should be rapidly phased out on the river and restricted to no-wake speed in the interim. A single motor boat can disrupt the peace and serenity of a large number of people over a large area. This situation will only be exacerbated as use increases if motor boats are allowed to remain. It is a myth that the elderly or disabled will be prevented from using the river if motorized access is not allowed. The Missouri is an easy river to float and floating is the ideal way for the unskilled or disabled to experience the river. Motor boats have the entire Fort Peck Reservoir, they should not be allowed on the "Wild" Missouri too.
2253	1815	The 149 mile "Wild and Scenic" portion of the 2700 mile river should be quiet and primitive. Motorized water craft should be prohibited on that portion of the river.
2253	1817	Maintain the historic character of W & Scenic M by precluding all motors on watercraft.
2253	1822	On motorized travel (watercraft) - keep them out of the wild and scenic portion period. The Big Mo is 2700 miles long, and this 149 mile section of river deserves the primitive, quiet character it now pretty much enjoys.
2253	1830	There should be no motor boats on the wild & scenic portion of the river.
2253	1831	Motorized and nonmotorized recreation, at least for the nonmotorized group, are simply not compatible. I should not be forced to spend 6 or 8 thousand dollars on motorized recreation to enjoy the experience. Motorized recreation along the Missouri Breaks needs to be stopped so that everyone can enjoy and relive the Lewis and Clark expedition experience.
2253	1832	Prohibit jet skis and other water craft for all year round not just the summer season. Nonmotorized river travel will keep the natural integrity of the area for future generations to enjoy.
2253	1836	No motorized traffic on the river. After all, motor noise and pollution extends far beyond the motor boat. After canoeing with people ranging in age from very senior citizens to babies, I believe anyone can enjoy the river without motorized transport. In extreme cases requiring motors, use should be by permit only with no-wake speeds and quiet motors.
2253	1843	Quiet usage; noise pollution can be a very large factor in any wild area. In the case of this area the use of powerboats that are capable of going upstream in shallow water require a fairly large engine. This is especially so if they are used to guide tourists and the associated equipment they require. Personal experience has, although infrequent to date, led me to believe power boats have no place on this river during the floating season. They can be heard for miles as they claw their way upstream. If allowed at all it should only be during the big game season.
2253	1843	Whenever possible administrative use should be restricted to canoes with small motors.
2253	1849	In my opinion, the BLM should ban all motorized boat traffic within the monument boundaries to ensure that this state and national treasure remains as pristine and wild as possible. Boats, jet skis and all type of watercraft are a nuisance to those trying to enjoy the monument and they should be removed from the monument. They take away from the quiet splendor of this monument, disrupt wildlife, pollute the waters, and destroy any peaceful experience exploring the shores of the river.

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2253	1851	As you well know, soils along the MRB are highly sensitive to erosion. The natural rise and fall in water levels have resulted in the formation of steps along the shoreline. Artificial wakes caused by motorized craft, especially high-speed river boats and jet boats, will cause irreparable damage to these fragile banks. In addition, there is the desire to have the Missouri Breaks remain primitive and quiet. At least a portion--such as the Wild and Scenic segment--should remain off bounds to motorized craft.
2253	1852	Manage the river in a way that's sympathetic to the users. Don't set up river rangers in a way that makes them a caste above the typical user--manage by example. I floated the river in early July and encountered 5 motorized craft going up and down the river. All of them were BLM canoes and boats, with the staff cruising the river, hand on the throttle, leaning back with their feet up. Aside from the droning noise, and the marginal non-compliance with the no wake rule--I sensed a disturbing trend--that the rules and the ethics of the river don't apply to the managers. You'll be more effective if you institute policies that manage the river in the way you expect it to be used. It may not be completely efficient in the short term, but it will be in the long term. You need to make sure that your staff is and remains empathetic with the user.
2253	1854	Eliminate river traffic which generates noise that violates wilderness solitude criteria, speeding, upstream traffic, by effecting horsepower limits, time of travel and frequency of boats, etc. limits on those action which create these environmental destructive results. Apply year long, no seasonal exceptions.
2253	1860	Motorized water travel should be restricted in order to preserve the solitude and quiet beauty of the river. As visitation intensifies with both the upcoming bicentennial of the Lewis and Clark expedition and natural increases in the interested public, managers of the Monument must recognize that it is essential that the experience of the area is not adversely affected by increases in noisily powered water traffic. The Monument plan should include a strategy for phasing out motorized water craft. At the very least, the no-wake rule should be applied throughout the year for the section of the river that passes through the Monument.
2253	1863	Motorized watercraft should be prohibited along the Wild and Scenic segment of the Missouri.
2253	1864	Designate a section of the Missouri River as a no motor area to preserve the quiet and primitive nature of the river corridor.
2253	1866	At least 3 days of each week should be motor boat free.
2253	1869	The ideal solution would be to prohibit motorized travel on the river, but since this is probably politically impossible, a No-Wake rule should be in effect all year long. Or perhaps a 10 hp maximum could be established for outboard engines (no inboards allowed) as is in effect on some of Glacier National Park's more remote lakes.
2253	1874	A calm and unhurried pace of travel along the river must be maintained. To this end it is necessary to prohibit the use of motorized watercraft on the river and motorized land vehicles on land that is visible or audible from the river.
2253	1875	Only allow no wake speeds or set horsepower limits for motors.
2253	1878	I want to add my voice to those who oppose motorized traffic on the Missouri. Places of quiet and beauty are in scarce supply, and we should not spoil the few that are left.
2253	1879	I urge that motorized use on the river be eliminated. The effect of motors on the native species in the river corridor should be studied. At the least, there should be some opportunities for non-motorized recreationists to be able to enjoy periods in which no motorized use is allowed.
2253	1880	I consider preserving the tranquility of the river experience an absolute priority, and suggest that all travel in the river corridor should be non-motorized, year-round.
2253	1881	Only non-motorized travel should be permitted.
2253	1882	Motors should be banned from the wild and scenic portion with an emergency exception for rescues. Motors disrupt the natural quiet.
2253	1885	This section of the river also should be free of the intrusiveness of motorized craft.
2253	1887	I am opposed to allowing any type of motorized boat to be used in the wild & scenic portion of the river. I used to live in Michigan and can remember how the jet skis and racing boats took over the lakes and rivers so that all you could hear was the roar of motors and huge wakes destroying any fishing or any quiet floating along the water.
2253	1889	Disallow all powered water craft in this stretch of the Missouri. Allow boat traffic powered by oar or drifting.
2253	1891	The river itself should be kept safe from being over-run by motorized boats.

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2253	1892	I support no motors on this section, and no jet skis anywhere. They have no place on this river.
2253	1897	There should be no private motorized craft allowed between Ft. Benton and Kipp Bridge, other than official ranger boats or search and rescue operations.
2253	1901	I would recommend prohibiting motor boats on the Wild and Scenic section of the Missouri.
2253	1905	Motorized boats should be limited to no-wake speeds at all times.
2253	1907	Motorized watercraft should be prohibited on the Wild and Scenic portion of the Missouri.
2253	1918	Only non-motorized boats should be allowed on the Missouri River corridor to protect its serenity and keep polluting emissions out.
2253	1944	Allow as little motorized traffic on the upper Missouri as possible.
2253	1952	Protect the quality and tranquility of the river experience by requiring that all travel in the Missouri River corridor be non-motorized throughout the year.
2253	1965	Travel along the Missouri River should be non-motorized all year long.
2253	1966	Protect the quality and tranquility of the river experience but also allow the majority of the public to recreate. This includes motorized recreation.
2253	1968	Please restrict motorized boat travel in the Missouri River monument management plan. BLM use for search and rescue and day-to-day management would be okay.
2253	1973	Keep motors to a minority. There are other places for loud river craft and scenery at high speeds.
2253	1975	The plan should limit the numbers, types, and speeds of boats and other watercraft on the river within the Monument. All motorized watercraft should be prohibited within the Wild and Scenic portion of the river. High-speed watercraft, such as jet skis and jet boats, should be prohibited throughout the Monument and low speeds should be required for any motorboats allowed outside the Wild and Scenic portion of the river within the Monument.
2253	1975	Regulation of motorized use on and off the river is necessary to maintain the natural values of the area.
2253	1976	A carefully worked out system of time zoning should be developed in consultation with the RAC. This would provide some times of the year when users would not have to hear motor boats. Some part of the floating and hunting seasons should be devoted to non-motorized boats. Motorized boats should be the first to be use-restricted if and when use restriction becomes necessary.
2253	1985	The RMP must protect the quality and tranquility of the river experience by requiring that all travel, except for BLM managers, in the Missouri River corridor be non-motorized throughout the year.
2253	1989	It would be spectacular if we could have the Missouri River corridor be nonmotorized throughout the year. That is our dream of a perfect vacation. No noise from motors.
2253	1992	Use on the Missouri River is steadily increasing, not only during the high use season of summer, but also during the "shoulder" seasons of spring and fall, especially hunting season. The current seasonal restrictions on motorized travel are not enough to ensure the quiet beauty of this landscape. In order to protect the primitive character of this river the BLM must prohibit motorized watercraft on the Wild and Scenic section.
2253	1995	We accept the non-wake requirement for all boats during the May to Oct. float season. We believe, however, that non-commercial users should be allowed to use motors of limited horsepower during big game general season and waterfowl season. Late fall can create some safety problems with travel over long distances during cold weather.
2253	1996	The BLM should designate the entire 149 miles of the Wild and Scenic Missouri as free from motorized boat travel. Such travel is unnecessary and will contribute substantially to noise pollution in the Monument.
2253	1996	Current seasonal "no-wake" restrictions and potential horsepower restrictions are inappropriate and insufficient as Monument visitation increases and motorized technology continues to improve. Allowing the corridor to become a noisy, crowded, motorized thoroughfare will substantially degrade the values for which the Monument was protected. By providing such protections for the Wild and Scenic portion of the Missouri, the Monument retains the wild, undeveloped character of the Breaks and provides for a boating experience unique to the entire length of the river and to the region.

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2253	1996	Designate the Missouri River corridor as free from motorized boat travel.
2253	2001	<p>Manage motorized use of the river corridor to emphasize a natural experience using recommendations by the Central RAC as a guide.</p> <p>All motorized use will be 'no wake' from Saturday before Memorial Day to the Sunday after Labor Day.</p> <p>Allow for controlled motorized use of the river corridor during hunting season provided such use does not compromise riparian health objectives or other aquatic resource health issues. Restrictions to minimize high-powered boat use, in an objectionable manner, must be considered to ensure a high quality experience for all visitors to the monument.</p> <p>Disallow the use of jet skis throughout the river corridor.</p> <p>Adjust river management plans to reflect consistency throughout, eliminate unrestricted motorized boating use areas presently in place.</p>
2253	2005	Motors should be prohibited on the river. They completely change the nature of the area for humans and wildlife.
2253	2009	Motorized craft on the Missouri should be limited to no-wake travel year long in enhancing the wild characteristics of the monument as the RAC recommended.
2253	2027	In order to protect the wild character of the national monument and respect the legacy of Lewis and Clark and the frontier history of Montana, the Missouri River within the monument should not be open to motorized boats. Leaving a fraction of the entire Missouri River drainage free of motors is a commonsense way to fulfill the purpose of the national monument and would provide a little bit of balance in the recreational use of the Missouri River. There should be some place on a major river system where traditional, nonmotorized water use is available in a nonmotorized setting.
2253	2032	The management plan should prohibit motorized recreational watercraft on the portion of the river designated as "Wild and Scenic" in 1977. It is not unreasonable to begin to establish some balance and expect that 149 miles of a 2700 mile Missouri River be free of motors. Where special use permits are required or needed for administrative use, exceptions could be allowed. If the status quo stays in place, the river will become a motorized throughway. The trends are unmistakable: No wild place can resist motorization without formal protection. The time to address the motor issue is now, in the RMP process, not in 5 or 10 years, when motorized watercraft become better established and the river -- and the monument becomes a far different, degraded place. Horsepower, wake speed, or other qualifying limits on motorized use won't address the real problem. If motors are allowed in qualified ways, evolving technology and ever-building public pressure will combine to meet the qualifications and still transform the river into a motorized corridor.
2253	2033	All motorized boats should be prohibited. Unless BLM acts now to stem the growth and prohibit all motorized use, the river will certainly become a motorized corridor. Such a loss of natural conditions should not be allowed to occur on the most undisturbed remaining stretch of the Missouri River.
2253	2036	Maintain the quiet character of the river and the river corridor; prohibit motorized use on the portion that is a Wild and Scenic River.
2253	2038	The rules being enforced on the river basically endorse floaters and ban power boating during most of the year. This is not right and needs to be relooked. If there are user conflicts, why are power boaters forced to provide the solution? Boaters would be very happy if they could be allowed to boat three days a week and share the river with floaters. Throw in a few holidays. Upstream travel during the paddlefish and walleye run in early spring from the Robinson Bridge to Demars Bottom would be terrific. Why not work with the Crooked Creek Chapter of Walleyes Unlimited and see if some user friendly rules could be developed? A little slack here will go a long ways with local residents.
2253	2039	We would like to see motors limited to official ranger boats and for emergencies. The sound of motors is very disruptive to the enjoyment of the river.
2253	2044	Motorized watercraft should be prohibited from disturbing the natural ambience of the cliffs and uplands that tower over this water. Provide the public with the opportunity to listen to the sounds of the wild that echo through the terrain. There are so few places to listen to the hush of the land anymore.
2253	5696	I would like to see the wild and scenic section of the river maintained as nonmotorized except for emergency and management reasons.

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2253	10003	Prohibit jet skis (i.e., "personal water craft") and require other motorized boats to observe no-wake speeds all year long. (Currently, a no-wake rule is in effect from Memorial Day to Labor Day. But high-speed motor craft are now proliferating on the river in spring and fall seasons, intruding on the experience of traditional, nonmotorized river travel and degrading the high-quality hunting and recreational opportunities in the river corridor.)
2253	10006	Maintain the current quiet, primitive character of the Wild and Scenic segment of the Missouri River by prohibiting motorized watercraft.
2253	10007	To preserve the tranquility of the river experience, all travel in the Wild and Scenic Missouri River corridor should be non-motorized year round.
2253	10009	Protect the quality and tranquility of the river experience by requiring that all travel in the Missouri River corridor be non-motorized throughout the year.
2254	79	Outfitters should not be allowed to sell the public game to the highest bidder.
2254	115	Do not let all the permits go to outfitters. The average Joe should always have access too, even if they have to make a reservation.
2254	124	Private outfitters should not have any preference in a launch allocation system. The dramatic increase in outfitters the last year definitely changed the flavor of the float.
2254	144	Outfitters should not be allowed a preference and in fact, there should be controls placed on them so as to not negatively impact the private floater (i.e. taking up all the choice camping sites, large groups).
2254	171	A cap should be placed on outfitters.
2254	178	RAC Subgroup management issues concerning control/limiting use of protected areas to assure that natural resource values are not lost: 1) equitable access management system; 2) no outfitting unless access to all of public; 3) user choice as to whether to use outfitters; and 4) no establishment of 'vested rights.'
2254	182	With the recent influx of users (used to see no one), outfitted groups of floaters with their every need catered to create a risk of destroying the ambiance. If they get to "own" the river I will never want to see it again.
2254	1695	BLM should not institute any system of reserved access to the public resource for the specific benefit of commercial service providers within the monument.
2254	1695	I request that BLM adopt a management policy that allows no special use permits to be issued to outfitters on BLM lands where the public has no legal, equitable access.
2254	1712	Commercial hunting operations probably should be excluded from the public estate and, if allowed at all, only permitted where the public has equal access to the public lands.
2254	1717	If there is to be any kind of allocation of river use, the vast majority of trips should go to unguided visitors. Most of the commercial activity related to the river should be limited to canoe and gear rental and shuttle service. Anybody can float the Missouri; there's little need for guiding for technical or safety reasons.
2254	1765	Tour businesses are already threatening Wild Horse Island State Park. I think it's far past time for people to get off their behinds and either walk to or hike to or row to areas that should be left in as pristine a state as possible for the use of future generations.
2254	1803	Do not allow commercial outfitters into areas where the public does not have equal access.
2254	1809	Outfitting should not be permitted to operate on public land where the public does not have equitable access. The Monument is a public resource and BLM should not allow it to become a private recreational preserve for commercial ventures.
2254	1843	Outfitters must be permitted and the use of the permit system can and should control the launch and take out procedures. As it stands now outfitters are not permitted to enter any National Park or Monument willy nilly at their own discretion.
2254	1852	Outfitters should not be allowed to run generators in order to charge the batteries for their motors (as Star West does) or any other purpose.
2254	1854	Immediately effect commercial outfitters licenses limits, specifically eliminate the current privileged reservations process and user limits to outfitters. Everybody throws their application in annual pot, specifically including outfitters (one person application) and whoever draws a float permit can make their own arrangements.

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2254	1854	Do not permit any outfitters access or special use permits anywhere within the Breaks NM where the general public does not have access.
2254	1860	Outfitters who are allowed private access that is not allowed to the public should not be permitted.
2254	1866	Commercial outfitters should be strictly limited and controlled. The privatization of public lands and public wildlife should not be condoned.
2254	1976	Guiding is an important option for recreation and hunting visitors. The primary need for guided trips is education, interpretation and facilitation of visitors who do not have the skill or equipment to float the river or hunt on their own. We believe that there will be a time in the near future when recreational floating use will need to be restricted. With that in mind, the BLM should be very careful not to create any priority, or use right, to guides. At the time use restriction becomes necessary, guides should not have any first opportunities or priority over citizen permits. We believe that it is critical that recreational floating and wildlife hunting opportunities on public rivers not be privatized. Any permits should be issued to the public and not to guides.
2254	1976	As far as guided hunts are concerned, no guiding should be allowed from private land onto public land that is blocked from public use. We believe it is improper to create incentive to close access to the public land.
2254	1995	<p>The public land within the monument lacks adequate access. Road systems within the monument are not the real problem. Access to the boundary is more of a concern since many private landowners do not allow public access through their land to the BLM and State land beyond.</p> <p>Much of this is brought on by outfitters who pay or otherwise reward landowners for preventing public access. Your agency compounds this problem by issuing outfitting permits and rewarding these people for preventing the public from enjoying their own land.</p> <p>We urge you to put an end to much of this by not issuing outfitting permits for any public land area unless the public has the same access opportunities as the outfitter and his or her clients. That would include both mode of transportation and distance involved.</p>
2254	1996	<p>Specific Recommendations for Fair and Equitable Outfitter and Guide Operations:</p> <p>Hunting outfitting on public land within the Monument should only be allowed on those public lands that have open public access.</p> <p>The BLM should provide equitable access for hunting and other purposes and discontinue those provisions that contribute to exclusive use of public land by commercial outfitters.</p> <p>In the event that it is decided that opportunities to hunt, fish or float become based on an allocation system, the fundamental standard for all allocations must be based on a process in which permits are awarded on a randomly selected basis and only individuals representing themselves as members of the general public should be allowed to apply. Private commercial outfitters should not be provided with any guaranteed use, access rights or permits in the event that use restrictions on public lands and waters are implemented. Public individuals drawing use permits in a randomly selected process should be allowed to utilize the guide or outfitter of their choice when they travel within the monument.</p>
2254	2001	Limit commercial, motorized tourist operations so that commercial ventures are not given preferential treatment or conflict with non-commercial public use. If allocation is needed in the future to deal with crowding or issues of overuse, allocation/use must be given to the public.
2254	2005	Commercial guides and outfitters should be permitted but limited.
2254	2012	Encourage outfitters to cooperate and stagger start times for groups during the busiest times (schedule starts on different days, etc.) Some outfitters have agreements with private landowners—study how that is working out.
2254	2023	I recommend you fully explore options to limit commercial outfitting on blocks of public land to those areas where there is or can be equivalent public access. There really shouldn't be significant parcels or blocks of public land that are used exclusively by commercial outfitters.
2254	2048	I believe river outfitting should not be hampered, but encouraged. In my experience, these visitors have the least impact on the resource. The same holds true for outfitted hunters.
2255	17	Allow the State of Montana to retain the authority and responsibility of managing fish and wildlife within the boundaries of the MBNM.
2255	157	Continue with allowing hunting.

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2255	168	Hunting and fishing should be fostered as part of a quality outdoor experience.
2255	177	Trapping has been one of the historical uses and the Montana Trappers Association requests that it be kept.
2255	1681	Continue wildlife management and hunting within the area. The wildlife does not interfere with cattle grazing, and it is a traditional use that has been around since long before Lewis and Clark visited the area.
2255	1712	The Hunter Behavior Advisory Council in their 12/98 report recommended that wildlife and land management agencies address creating and maintaining ethical hunting environments. In your planning for the monument, the BLM has an excellent opportunity to respond to that recommendation.
2255	1719	Hunting and fishing and other outdoor activities shall not be restricted except as provided by Montana regulations.
2255	1858	Please keep the Monument open to public hunting and non-motorized boating.
2255	1861	Let's not degrade the high quality hunting and "quiet" recreational opportunities in the river corridor. Future generations deserve so much more!
2255	1978	Clearly distinguish issues related to wildlife and hunting. Hunting, fishing, and trapping shall be recognized as historic and traditional uses in the Monument and shall be included in current and future management plans.
2255	1996	The BLM should work to restore and augment wildlife sporting species and provide world class hunting opportunities for the general public as an historic use.
2255	2001	Include the following items into the list of concerns for scoping: Hunting and fishing shall be recognized as historic and traditional uses in the Monument and shall be included in current and future management plans. Hunting outfitting on public land within the Monument shall only be permitted on those public lands that have equivalent public access. Consideration for the public as a whole cannot be sacrificed for the benefit of commercial venues.
2255	2009	Animal damage control should only take place with monument manager approval. I have personally seen abuse by trappers. Trapping, I understand, is under the jurisdiction of Montana FWP. The problem is enforcement. There are not enough wardens to control the abuses.
2255	2021	Hunting outfitting on public land within the monument should only be allowed on those public lands that have equivalent public access.
2255	2023	I would like to emphasize the recommendation of the Montana Wildlife Federation regarding hunting and private outfitting on public lands that are generally unavailable to the general public. This is a recurring complaint that I hear, e.g. blocked public lands that are used exclusively by adjacent landowners and/or outfitters for personal gain.
2255	2028	Trapping has been one of the historical uses and the Montana Trappers Association requests that it be kept.
2255	2032	It is important that the management plan provides for fair, equitable permit and access opportunities for public and private persons and companies alike. Hunting outfitting should not be permitted to operate on public land where the public is denied equitable access. The monument is a public resource and cannot be allowed to become a private hunting preserve for commercial ventures. Hunting outfitting on public land within the Monument should only be allowed on those public lands that have equivalent public access. The BLM should provide equitable access for hunting and other purposes and discontinue those provisions that contribute to exclusive use of public land by commercial outfitters.
2255	10002	Develop a management plan that allows the state of Montana to retain authority for fish and wildlife management.
2255	10005	Montana should have authority over wildlife.
2256	15	Federal lands are a great source of free recreation for the public at large.

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In the July 26, 2002, meeting of the Upper Missouri River RAC Subgroup (a diverse set of volunteers working with the Central Montana Resource Advisory Council [RAC]), the Subgroup voted against the initiation of a visitor use fee program for this unique part of the American landscape. This recommendation comes after thorough discussion of this issue over previous Subgroup meetings and the efforts of a fact-finding committee of Subgroup members to explore the consequences of a fee program. The Subgroup believes that these fees will be counterproductive to the BLM's mission to protect and manage the nation's natural resources for the benefit of the American people.

Here is why the Subgroup believes that charging visitors a fee to access the river will do irreversible harm:

1. The Upper Missouri River flows through a remarkable complex of property ownerships, many with existing roads that can provide pathways for people to embark or disembark from the river. Because of the fragility of environmental, cultural, and historical characteristics, it is desirable to focus access to the river to specific locations to focus human impacts. These hardened access sites also provide a valuable opportunity to distribute valuable information on safety and appropriate river behaviors to the visiting public. Imposing fees on visitors will naturally displace visitors to other access points, where fees cannot be charged, and the negative impacts of human interactions to fragile resources will be felt.

2. Recreation use fees are disproportionately punitive to low-income families – those that can least afford to pay fees frequently decide to forego those settings where there is a demanding extra expense. This disproportionate negative impact flies in the face of the very idea of public lands, especially those of such a shared legacy as the Missouri River. Worse, it hurts the people of Montana, who already suffer one of the lowest levels of average income in the United States. Why should the people of Montana be excluded from the opportunity to experience the pleasures of the public lands in their own state?

3. Ongoing research on visitor use fees identifies that Americans have mixed feelings about visitor fees. Respondents to surveys on fees on National Forest lands strongly support opportunities for people to visit public lands without charge. Fees create a barrier that runs counter to longstanding policies regarding public land purposes – to provide for the health, well-being, and enjoyment of the American people. The issue is especially salient in the modern West, where land ownership is increasingly concentrated to the hands of fewer and fewer owners, and experiences of western landscapes are becoming more difficult. The nation is on the verge of celebrating the bicentennial of the Lewis and Clark expedition, and the creation of this barrier in one of the very few places where people can relive some of the authentic natural characteristics of this expedition is both untimely and unnecessary.

4. The number of visitors to the Missouri River corridor is relatively low, and it is very unlikely that the BLM will be able to net more than \$30,000 annually from new visitor use fees. This level of financial return occurs under a best-case scenario of very low overhead costs for fee administration and a \$10 per person fee (on the very edge of people's willingness to pay). This does not include the monies that the BLM already collects as a proportion of income from commercial permittees (outfitters). The new income received from fees would be less than 20% of the cost to manage recreation resources on the river (not including salaries of staff). If the sole reason for the BLM's imposition of fees is to garner additional revenue, this seems like a poor financial return for such a high social cost.

5. The imposition of fees hurts the local economy, not only because some people will decide not to visit the river because of the expense, but also because money spent on fees will be money not spent in local communities. Rural communities and county governments already support BLM recreation management via local taxpayer funding of search and rescue operations and other services. In a time of economic stress in rural economies, why make it more difficult for people to visit rural areas?

6. The timing of the imposition of fees could not be worse. The creation of the new Upper Missouri River Breaks National Monument occurred in a highly politicized setting. However, the highly positive efforts of the BLM to engage its Resource Advisory Council as a partner in shaping the public use of the Monument has helped to rebuild trust between the public and the agency. Indeed, the staff at Monument Headquarters remains open to ideas and suggestions of informed citizens. Members of the Subgroup have expressed their opposition to fees to local BLM officials through informal channels on multiple occasions. Yet the pressure for fees continues at precisely the time when public involvement in a new management plan is most critical. A unilateral decision to impose fees will be a trust-buster, and it will be hard to repair the damage.

2256	178	<p>Objective: Assure that BLM develops and implements an equitable access management use policy/procedure to assure that citizens who wish to visit/use the Monument have an equal chance to do so and are not forced to pay fees to outfitters, guides or other suppliers of goods and services, for things that they do not want or need.</p> <p>Why? Very often at popular recreation areas, some form of limitation procedure is required as biological or social carrying capacity is reached. (We tend to love/use some places to death.). Too often, as these restrictions are imposed, there is a loss of fairness in the opportunity to enjoy the area. Allocation systems are often devised that allow commercial service providers a guaranteed client base by awarding them some percentage of permitted use. Over time, as demand grows, the allocations made directly to service providers, such as outfitters, result in a situation where money or one's ability to pay determines who will use and enjoy the resource rather than a fair or equal chance to use the area. [For example, at many wild and scenic rivers, prime historical attractions, some hunting areas, etc. use typically increases until the impacts of use (erosion, destruction of vegetation, crowding and waste, etc.) require that some sort of restriction or use allocation system be imposed to protect the values that initially caused the area to be recognized and protected. The unconstrained capture and use of most of the nation's wildlife resources also required that we either regulate use or the species would become extinct.]</p> <p>Most recreation permitting systems in use today include some sort of "historic Use" reservation or allocation policy and procedure to protect the interests of outfitters or other businesses that operated in the area in the past. The way that these procedures are applied typically results in discrimination against private citizen users, forcing people to use an outfitter/guide whether or not the person wants or needs those services. They are often promoted as representing a regulated free market approach to assistance of recreationists when, in fact, they prevent rather than facilitate competition and market flexibility. This sometimes results in the "liquor license" type of economic gain. On the UMRBNM we have a unique opportunity to develop a system that is fairer. This is a new monument and use levels do not yet require the immediate implementation of an allocation system. There is time to develop and refine a different and non-discriminatory approach. We also now have available technology that will provide to potential users, real time information about use levels and the number of persons wanting to use permits and information about outfitters having permits to operate on the Upper Missouri Wild and Scenic River. On public land, the user should be free to choose whether he or she wants the services of an outfitter and also free to choose among the qualified providers of those services.</p>
2256	1717	User fees should be limited to commercial use and use of major developed areas like campgrounds; no launch fees, no backcountry fees, no fee to get into visitor centers, period.
2256	1769	We do not want included in the management plan any user fees.
2256	1809	User fees should not be imposed. The generation of user fees would change the management directive of the Monument and would create the expectation that services will be provided.
2256	1843	Fees; the demo user fee has to my knowledge never been extended to the BLM. If it was when and where did this occur? It was to be used exclusively with USFS sites. Further, the demo fee shows no capacity to generate any funds over and above the costs to operate the program unless the fees are excessive. It is not an equitable system in that fees are charged in some sites and not in others with no discernible reasons other than locale. In actual use how would the system even pretend to register all persons using the site. There are many, many places to launch and haul out on private land. To make the system fair to all users it would take a Gestapo police force continually cruising the river to catch violators, night and day, seven days a week and every month the river was not frozen. In addition, the chances that the Monument would retain even a majority of the funds collected is not promised. If the site can not be funded by the taxpaying public it is only because they have not been asked.
2256	1845	We don't want user fees and restrictions in any form that infringe on economic opportunities and use practices in the area.
2256	1852	I hope the BLM is not considering a user fee for this river. There are a lot of ways in which I feel this would break trust with those who have supported the monument, and confirm the paranoia of those who have opposed it. You don't need to make this the straw that breaks the camel's back. The amount of money a user fee would raise represents mere crumbs. If your superiors insist on a fee, make it symbolic. Treat the visitors as animal units, and assess them at the same rate you assess cattle at the AUM rate. A couple of people on the river for three days would amount to what--thirty cents, maybe? And a discount might be in order--after all, when I float the river, I don't eat the grass, and I bury my waste.
2256	1860	User fees should not be imposed on visitors. This befits an area whose value is beyond price, but addresses the reality that charging fees creates expectations of service and facilities that are inappropriate to the Monument.
2256	1976	We recommend a go-slow approach to fees. Problems of distortion of use patterns, collection costs, visitor acceptance and other potential problems are a reality that BLM should weigh carefully sometime in the distant future before use fees are considered.

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2256	1996	Due to the emphasis on minimal development within the Monument, the BLM should not impose fees on visitors. By charging visitors to enter the Monument it is highly likely that there will be an expectation of services and infrastructure in return. This expectation could create enough pressure to derail the minimal development policy, which would then fail to protect the character and resources of the Breaks.
2256	2012	Fees and quotas should be avoided.
2256	2032	As recommended by the RAC Subgroup, the BLM should not impose fees on visitors. The cost associated with collecting the fees is unlikely to justify the small amount of revenue which would be generated. Moreover, the proclamation emphasizes minimal development within the monument. Generating user fees changes the management directive of the BLM and creates the expectation that more services will be provided and infrastructure developed. This expectation could create enough pressure to derail the minimal development policy, which would then fail to protect the character and resources of the Breaks.
2256	2038	Under no circumstances should the BLM develop a user fee system (not even under the guise to reimburse local emergency services).
2256	2048	With regards to people management, I am opposed to a fee system. It could very well cost as much to administer as it brings in. It would also, I believe, be viewed negatively in the local communities.
2256	10008	We don't want a user fee system.
2257	167	Put emphasis on providing nonmotorized recreation opportunities (hiking and horseback riding) to compliment the objects for which the UMRBNM was designated to protect.
2257	1978	Provide opportunities for visitor exploration and discovery in an undeveloped, primitive setting.
2257	1978	Identify specific uses that will be acceptable/allowable; e.g., hiking may be allowed only on designated trails in certain areas of the Monument. Prohibit rock climbing where it would harm archeological, paleontological, biological or other resources.
2300	1724	Please manage the monument to reduce the sound of motors so that I can hear natural sounds. This means keeping cars to designated roads and motorboats to a no-wake limit.
2300	1854	Effect and enforce a strong Breaks NM boundary sign program to clearly identify the federal land and resources. Accomplish the same for public rights-of-way across private or state-administered land to the Breaks NM boundary. Do the same for all remaining, after closure efforts, for all trails, roads, roads, ways, routes, etc. within the Breaks NM to preclude all ORV, snowmobiles, vehicles, mechanized-motorized equipment from leaving the publicly marked open trails or roads. There can be no enforcement without an effective sign program in place. Budget for and assign BLM staff to an effective Breaks NM sign program now.
2300	1864	No permit should be given for competitive, special events like motorcycle racing or 4x4 rallies or fixed wing races. Special events which do not create noxious fumes, noise pollution and soil erosion may be studied on a case by case basis.
2300	1951	Motorized recreation -- in the form of motorized watercraft on the water; motorcycles, all-terrain vehicles, and full-sized vehicles on the land; and helicopters, fixed-wing planes, and other motorized aircraft in the skies -- is not currently an overwhelming problem in the Breaks, but that truth presents a tremendous, and not-to-be-repeated opportunity for BLM to enact strong, non-motorized use policies for the monument now, before motorized uses become widespread and entrenched in the monument, as they surely will in the absence of BLM resolve and vision in the current planning process.
2310	82	I feel it is very important to allow aircraft access.
2310	84	Immediate aviation concerns are that: 1. No general aviation overflight restrictions be imposed; 2. Existing (currently open or previously closed) airstrips be reopened or remain open; and 3. Consideration be given to public access by general aviation in general with identification of potential new airstrips.
2310	85	Please take into consideration previously existing airstrips and their usage, and create procedures and access rules which allow this to continue.
2310	99	I would like to see the airstrips in the Breaks that are now closed to the public, Slippery Ann and Sand Creek, open for public use. And I would like to see the other airstrips on public land that are in use now that are on BLM land and that are now part of the Monument to remain open for public use. Additionally, the private airstrips that are within the new Monument should remain without restrictions. In other areas of the state, recreational aircraft user groups provide annual maintenance as does Montana Aeronautics. I am also concerned that overflight altitude restrictions over the Breaks may be considered.

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2310	107	I am excited at the future prospect of utilizing existing airstrips in the MRB for camping and fishing opportunities.
2310	108	In addition to recreational use of the strips they provide a means of firefighting access and medical evacuation of hikers and boaters, should that become necessary. These strips normally do not see heavy usage associated with commercial airports but do serve a recreational use as important as boat access or trails. No group should be excluded from the enjoyment of this area.
2310	125	I do think that limited aviation access would be appropriate.
2310	141	In addition to recreational uses, air strips provide emergency landing places for my single engine Cessna 185 in the event of mechanical failure. These minimally improved landing strips on BLM managed lands afford pilots the only opportunity for an emergency landing within dozens of miles, in many cases.
2310	1836	No airstrips or landing strips.
2310	1856	My principal concern in the development of a Monument management plan is that of public access to the public's land. Specifically, I refer to access by private aircraft to landing strips that already exist within the Monument. These airstrips were constructed by the BLM and are still usable by certain type of aircraft. I want them to remain open. The demand for recreational opportunities for pilots and their families is increasing. The impact on the natural resources in the Monument would be minimal as the land disturbance has already occurred. The cost to the BLM would be nil, as pilot groups would do the maintenance. As a pilot with over forty years flying experience in Montana, I request that aircraft access be made part of the transportation plan for the Monument and that the aviation community be recognized for the input they can provide into the planning process.
2310	1864	There should be no landing strips developed in the Monument. There is no valid existing right to landing strips in the Monument.
2310	1889	Disallow powered flight access such as helicopter, floatplane and so forth except in case of emergency.
2310	1962	Other pilots have sent you locations of existing BLM and private landing sites in the study area. We want these sites part of the final transportation element of the plan.
2310	1987	Keep the grass airstrips—do not expand them.
2310	1994	I would like to add my voice in strong support of reopening the Slippery Ann airstrip. This area should be open to several forms of access and not the exclusive domain of automobiles, buses, and winnebagos. The land belongs to all of us and should not be denied to those with aircraft as a viable means of transportation.
2310	1996	The BLM should not allow private or commercial airstrips in the Monument.
2310	1996	The BLM should evaluate the impact of aircraft operations on wildlife and visitor experience in the Monument.
2310	1997	A back country airstrip provides a simple runway, meeting the most basic requirement of accepting small general aviation aircraft operations, and are depicted on Federal, State and local maps and charts. Some are already known to land managers at the BLM and are often erroneously referred to as "abandoned". While this term may apply to the original constructors, these airstrips have been in casual use and maintained by the flying public. Lewistown area managers should create a framework for the continued use and maintenance of these airstrips. To that end I am proposing that these landing strips be included in the RMP Planning Process. I will submit a set of Exhibits at a later date with location, condition, and other pertinent information on these airstrips. Presently , three of these are known to local pilots as Cow Creek, Black Butte, and Bullwhacker Coulee. The airplane uses only a small strip of land, typically about the width of a dirt road and less than one-half mile in length. An airplane has no drive train connected to its wheels and by its very nature renders one on foot after landing! Only footprints leave the airstrip.
2310	2000	There are existing airstrips within the monument that the Montana Aeronautics Division desires remain open for public use. The individual traveling by aircraft deserves the same access to the monument to enjoy the recreational opportunities offered by the area s others. Also of importance is the role these airstrips play relative to an emergency landing strip.
2310	2009	There should be no recreational airstrips in the monument. Aircraft should not have public access like any other hiker or recreationists and certainly there should be some places in the United States that you don't have to hear noisy aircraft. Overflight restrictions are a must for the river and the uplands in the monument.

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2310	2017	<p>The Montana Pilots' Association is aware of four airstrips on BLM land that are now encompassed by the new Monument. As pilots in the state we have referred to these as Black Butte, Ervin Ridge, Bullwhacker Coulee, and Cow Creek. Geographically these airstrips are all on the north side of the river close to 109° of longitude. They can also be found on the Winifred BLM map as well as the DeLorme computer mapping software.</p> <p>Besides the airstrips mentioned above on BLM land there are also two airstrips on USFWS land in the Breaks called Sand Creek and Slippery Ann. And there are other strips on private inholdings within the Monument.</p> <p>As pilots with recreational interests we would like to see these airstrips included in travel plan maps of the new Monument. We're also interested, as a group, in maintaining these airstrips for casual use, which would include some limited brush trimming. According to contacts we've made recently with the BLM office these airstrips are open today for use by pilots and we know that they do see limited use.</p> <p>Additionally, it is our understanding that the federal government cannot now close these airstrips on the BLM land "without public notice, consultation with appropriate Federal and State aviation officials, and the consent of the Federal Aviation Administration." This quote is taken from the Memo of Understanding between the Department of Agriculture and Senator Crapo from April of 2001 in regards to "Backcountry Airstrips" on federal land.</p> <p>These airstrips are recognized by pilots in the state as having some historical value as well. We understand that they were pioneered in the 1960's for use in firefighting and later gas and oil prospecting.</p> <p>Though not all Montanans were pleased with the creation of this new Monument we are willing to work within the planning process to make our needs and desires known. We feel it is only right that airstrips open to the public prior to the Monument status remain open.</p> <p>One other issue that concerns us is the possibility of altitude restrictions on overflights on the Monument. We would like to go on record as opposing any minimum altitude requirements for overflying the Breaks area. Some parts of the country, such as the Grand Canyon area of Arizona have very restrictive minimum altitudes and narrow travel corridors. We believe that such restrictions would be unnecessary for the Breaks Monument.</p>
2310	2021	No private or commercial airstrips in the monument.
2310	2029	Non-pilots should realize that backcountry airstrips are a fantastic asset that should be preserved and encouraged. 1. Backcountry airstrips are used for rescue, fire-fighting, emergency landing and recreation; 2. Maintenance is often volunteered by the users (weed control, wind sock, camp area); 3. The area for a typical strip is less than 5 acres, requires no costly access road with ongoing maintenance and dust; 4. Since most pilots enjoy hiking, camping, and the outdoors, any temporary closure of airstrips to protect wildlife breeding can be accepted.
2310	2031	The aviation community believes the existing uses currently in the area should be allowed to continue. Just as floaters, boaters, hunters and such feel that they should be allowed to continue to enjoy the area, we too feel the same. Any discussion relating to overflights is not appropriate and should not even be considered. There are existing airstrips in the proposed monument and we would like to work with you on the continued use of those facilities. Aircraft are one of the least intrusive forms of access and we are not seeking to create new landing facilities, but merely to maintain that which we now have. Once on the ground an airplane goes no further.
2310	2034	The Aircraft Owners and Pilots Association (AOPA) is an organization headquartered in Frederick, Maryland representing over 385,000 aircraft owners and pilots. AOPA strongly supports keeping airports and airstrips on public lands open for public use. The existing airstrips within the Monument boundary should be included in the transportation element of the resource management plan. Pilots and their passengers should be allowed the same recreational opportunities within the Monument as others. In addition, consideration needs to be given to the role these airstrips provide for emergencies and wildlife management.
2310	2037	We are writing to ask that you keep open all airstrips within the new Missouri Breaks Monument. These strips are a real joy to be able to fly into and take a short hike when my wife and I are occasionally traversing your great area. Airplanes create exceptionally little impact and these airstrips afford a great opportunity to visit some of our greatest natural and scenic areas. Air travel has grown slowly but steadily over the years and should definitely be included in future planning for public access to these areas. Again, the impact is very small and limited to the strip only, and general aviation pilots and their families are known to be good stewards of the land.
2310	2050	I am asking you to work with the pilots' associations to keep these airstrips open. One of the nice things of the Montana Pilots' Association and its close relationship with the Montana Aeronautics Division is that we maintain and keep airstrips operational, cleaned up, and repaired. You would be pleased to know that these organizations are willing to help take care of these airstrips within your new Missouri Breaks Monument area.

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2310	5698	<p>I am a pilot in the Seattle area, and I would like to see the airstrips in the Breaks remain open for recreational use. In the state of Washington there are essentially no airstrips like this--places where one can land, camp, and get away from the crowds for a few days. Idaho has many such airstrips, but Montana has only a few. I myself just learned of the existence of these strips a few weeks ago, so I haven't even visited any of them, but I hope to at least get to Bullwhacker next summer.</p> <p>The environmental impact of these strips is minimal. The desolate nature of the surrounding area means not all that many pilots will even find them appealing, perhaps 20 or 30 planes per year. Airplane camping does not require stock that can overgraze and erode the soil. The exotic-plant-spreading potential of a few aircraft is minimal compared to that of livestock. And the majority of airplane campers are conscientious about packing out everything they brought in.</p> <p>Please keep these strips open for public use. Furthermore, resist the urge to institute overflight restrictions in this area. The Missouri River Breaks is a huge piece of land, and even requiring flights to maintain 1000 feet terrain clearance will create a huge navigational obstacle in poor weather, especially in winter.</p>
2311	81	<p>I would like to see aviation included in the resource management plan.</p>
2311	83	<p>I would very much like to see the use of aircraft in the Monument area encouraged by the opening of the Slippery Ann airstrip, and Sand Coulee airstrip to use by pilots wishing to explore the area. I would like to make sure that there are no further restrictions on air travel through the area, and that all of the private airstrips located within the area face no new restrictions placed on the entire monument area.</p>
2311	85	<p>I am very concerned that (General Aviation) GA privileges be retained, supported, and encouraged in the area of the monument.</p>
2311	85	<p>I urge you to create appropriate rules/permissions for pilots who wish to transit the area or simply to visit and sightsee by air.</p>
2311	1768	<p>I would urge a plan that establishes minimum overflight altitudes that prohibit low-level sightseeing trips, and prohibits the establishment of so-called "backcountry" or "recreational" airstrips.</p>
2311	1794	<p>It should be obvious that low elevation aircraft should not be allowed.</p>
2311	1852	<p>We don't need commercial overflight concessions.</p>
2311	1907	<p>aircraft tours below 5,000 ft a.g.l. should be strictly prohibited.</p>
2311	1951	<p>BLM should act immediately to prohibit commercial overflights in the national monument, establish minimum flight altitudes for aircraft above the monument, and prohibit use of any airstrips within the monument.</p>
2311	1962	<p>We now abide by FAA rules and regulations, and state statues pertaining to aircraft operations. Any additional flight restrictions should not be considered in the final plan.</p>
2311	1970	<p>I floated the Wild and Scenic Missouri from 20-24 August. The experience was diminished by motors, jets and helicopters.</p>
2311	1996	<p>The BLM should make recommendations to the Federal Aviation Authority to restrict private, commercial, and military overflights in the Monument. These recommendations should emphasize eliminating air travel in the Monument. Only if this is not possible should the BLM then recommend establishing strict altitude standards for aircraft. These standards should be determined by the effect of air travel on the remote character of the Monument, on visitor experience, and on wildlife.</p>
2311	2032	<p>The BLM should act on the recommendation of the RAC to "Ban commercial recreational overflights over the Upper Missouri National Wild and Scenic River Corridor" as well as the monument uplands and seek support from the Federal Aviation Authority and other appropriate agencies. Allowing the Breaks to become a popular thoroughfare with private and commercial aircraft degrades the character of the monument. The BLM should make recommendations to the Federal Aviation Authority to limit private and military overflights in the monument and establish strict altitude standards for aircraft. These standards should be determined by the effect of air travel on the remote character of the monument, on visitor experience, and on wildlife. Recreational airstrips in the monument should be prohibited.</p>
2311	10004	<p>Immediate aviation concerns are that: 1. No general aviation overflight restrictions be imposed; 2. Existing (currently open or previously closed) airstrips be reopened or remain open; 3. Consideration be given to public access by general aviation in general with identification of potential new airstrips.</p>

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2320	10	Ingress of roads will destroy large areas, and off-road vehicle use will do irreparable harm to the sensitive ecosystem.
2320	15	Ensure access for environmentally sound outdoor activities such as hunting and fishing, but severely limit ATV and the like.
2320	17	Prohibit the construction of new roads and manage the existing road and trail network to maintain the primitive nature of the MBNM.
2320	31	No ORV's!
2320	31	Prohibit construction of new roads.
2320	32	Wildlife living in this region may be threatened by a management plan which allows for the creation of new roads, and the use of off road vehicles in sensitive areas.
2320	42	Please restrict off road vehicle use in sensitive areas.
2320	46	No new roads, restrict off-road vehicle use from sensitive areas.
2320	47	Keep the MRBNN free from motorized traffic all year long.
2320	51	I believe that allowing ATVs or dirt bikes off road here (or anywhere) would ruin much of the beauty of the Breaks. A plan to ban motorization on all but established roads would be greatly appreciated.
2320	52	One has only to look at much of our national forest where logging roads, off-road vehicles of all kinds and during all seasons contribute damage to wildlife and ecology.
2320	57	There should not be motorized travel, as this damages wildlife populations and also reduces the wilderness experience of others.
2320	59	ATVs must be limited.
2320	61	We do not need snowmobiles, ATVs, SUV trails any place. Ban all these activities. Maintain only the existing roads for public entrance.
2320	64	The plan must prohibit cross-country travel by all-terrain vehicles and other motorized vehicles such as motorcycles and snowmobiles.
2320	79	I do not believe that there is any need for the building of any more roads or trails in the Breaks.
2320	80	Motorized use needs to be restricted to the minimum number of roads designed for such use.
2320	86	Please adopt a travel plan which keeps motorized vehicles of all sorts on designated roads.
2320	91	Allowing unlimited access to existing roads invites abuse by ATVs, dirt bikes, snowmobiles, and other motorized vehicles.
2320	92	All travel by motorized vehicles should be limited to existing improved roads. No cross-country travel by ATV, motorcycle, and dune buggy should be permitted except for emergency management purposes. If such activity is allowed it should be limited to designated "sacrifice areas" where the destruction of soils and vegetation is planned.
2320	96	Keep all motorized toys out.
2320	97	It should be protected from motorized vehicles--including jet skis.
2320	99	I would like to see the existing road system in the Breaks remain open to vehicular travel without any undue seasonal restrictions.
2320	99	I am not in favor of off-road travel by conventional vehicles or 4-wheeler types.
2320	114	As a user of public land I believe access concern does (and should) run both directions. Preventing users of public land from accessing the same needs to be addressed. Keeping the roads open to both the owners and the users should be important in the management plan.

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2320	115	I firmly believe there should be ground transportation access to many of the historical sites. Many, many people who cannot afford guided river trips--financially or physically--should be encouraged to visit this wonderful part of Montana, and Montana history.
2320	115	I think we should have more and better roads for day use recreation within the monument.
2320	117	Access should be by existing roads or by river (no motorboats). It should be the users' responsibility to find transportation.
2320	117	I would like to allow off-highway vehicle use on existing roads only, but unless there is some enforcement to ensure they stay on roads, I am opposed to OHV use on the monument.
2320	118	Maintain public access for hunting, fishing and recreation. Don't punch in new roads or trails, but maintain those presently in place. I certainly favor nonmotorized travel within the monument, not dirt bikes, ATVs, etc.
2320	119	Some of my concerns: too many unnecessary roads, trails and motorized traffic in the area; non-correlation of motorized vehicle use on state and federal lands.
2320	122	Don't allow uncontrolled travel by motorized vehicles off of designated roads.
2320	124	All ORVs need to be kept on designated, existing, improved roads. There needs to be active enforcement of this. We have noticed a rapid increase in the amount of weeds in the area, much of which is undoubtedly due to ORV use. No motorized cross-country travel should be permitted and all areas of the monument should be off limits to ORVs unless specifically designated as open.
2320	125	I don't believe that motorized vehicles should be allowed, except on already existing improved roads.
2320	134	This area must be protected from the polluting and destructive off-road vehicles.
2320	148	Limit roads to those just absolutely necessary. This means closing roads in some instances, so the area's natural beauty can be maintained. Wildlife will benefit, not only improving the quality experience that true hunter ethics dictate, but by reducing the "slob" roadside or vehicular shootings. Managing the Breaks is difficult enough without having excessive access with little funding for enforcement of existing regulations.
2320	152	Motorized bikes, cars should be barred from the federally owned lands in the Missouri Breaks, except for campgrounds, loading sites and developed areas.
2320	153	Roads and transportation issues. BLM has been updating maps of all the roads and trails existing in the Breaks. The amount of roads and trails in the area are more than what is needed for administration, management and recreation (hunting). With BLM's, Off Highway Vehicle (OHV) Plan and the Monument designation, cross county vehicle travel is limited to emergency situations or very specific activities. Further, designation of open and closed areas/roads/trails will be dealt with in the Monument planning. Reasons for keeping areas open or closed need to be addressed. Concern for erosion, wildlife security, quality of recreation, and aesthetics will frame reasons for closures. Closed areas to protect winter habitat may not be an issue right now, however problems could easily develop with gas development activity. Reasonable access and providing opportunities for recreation and convenience of management (gas facility service, grazing etc) will frame reasons for having open roads and trails. Mt F,W&P doesn't believe that vehicle access for sheep hunters should be an issue because one way or another these folks will get into the area since sheep permits are such a prized opportunity. Access and vehicle use during off season for trappers could be a special circumstance to deal with. Sometimes there is a problem being clear on access and use. Since it is permissible for authorized users within the terms and conditions of permits to have vehicle access and OHV use, there is a tendency to think a person has the privilege when that is not the case. It is the use that is the issue. (Example: A grazing permittee would be allowed to use a closed trail with a vehicle if it was for purposes of normal livestock and range management, but the same person would not be authorized to use the same trail to go hunting.) Mt F,W&P would like some agreement with BLM that will allow them to pursue and enforce off road and road closure violations.
2320	154	If there are any areas which currently need to be closed to dirt bikes and all-terrain vehicles, so that the area can be rehabilitated to stop accelerated erosion, that needs to be accomplished.
2320	155	Thorough study should be done before any roads are improved or maintained. Unnecessary roads, trails, and routes should be closed and damaged areas restored or reclaimed. Motorized vehicular traffic should be restricted with a "closed unless designated open" policy.

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2320	157	Restrict motorized vehicles to existing improved roads. Nonmotorized travel should be encouraged and emphasized. Do not build any more roads and eliminate any unimproved ways that are currently used or unimproved roads.
2320	161	Ban motorized cross-country travel in all forms.
2320	168	Vehicle access should be controlled and restricted to roads already in place.
2320	171	ORV use should be prohibited and vehicles kept on identified roads except where necessary for fence or improvement maintenance.
2320	172	Strictly limit motorized vehicles to existing, improved roads.
2320	174	Keep all motorized vehicles on essential designated roads. Do not allow motorized vehicle travel on trails or cross country.
2320	175	I would like to see more roads closed during the big game season. However, I do like the idea of being able to retrieve your game during certain time of the day (10am-2pm) due to the temperature.
2320	177	Trappers have historically accessed this land from both sides and from end to end and the Montana Trappers Association requests that this access remain as such. Historical access has relied on existing roads and trails, and the MTA requests that all existing roads and trails be kept open. The MTA further requests that no seasonal closures of any existing roads or trails be implemented, as this would severely impact the accessibility of the land.
2320	178	RAC Subgroup access/visitor management issues of concern: 1) assuring that public has access to public lands; 2) roads out of wilderness areas; and 3) hunter access to retrieve game animals.
2320	180	How do you propose to improve the current gumbo, substandard roads to allow access? At whose cost?
2320	183	No off-road travel by vehicles or ATV, motor bikes, etc.
2320	197	Protect the Missouri Breaks and Missouri River from motorized use. Allowing vehicles to travel anywhere except on improved roads is/would be a travesty for the area.
2320	198	Limit use of motorized vehicles.
2320	336	The transportation system used at Zion Park and Bryce Canyon are very effective and to be emulated.
2320	1678	Access should be made to the most desirable sites in the form of paved roads. Additionally trails should be constructed to desirable areas within the monument.
2320	1680	I favor limiting vehicles to maintained roads and favor closing user-created routes.
2320	1681	We feel that road access must be provided and maintained for the local landowner as well as visitors to and within the area. Road access must be made available for the aged and handicapped. Cross-country motorized travel on open range or unroaded lands should not be permitted. However, vast areas of unroaded lands should not be established. Some access to the river at several areas must be retained. Some kinds of transportation methods, motorcycles and off-road vehicles, should be limited or restricted.
2320	1689	Noisy watercraft, motorbikes and ATVs are not desirable in the Missouri Breaks if it is to remain wild and scenic. All-terrain vehicles cause unlimited erosion when they are permitted off established roads and trails.
2320	1695	A travel management plan should include the following policies: 1. All roads and trails within the monument are closed to public travel unless designated as open; 2. No off-road travel is permitted; 3. During hunting season, certain roads and trails may be designated for game retrieval during the hours of 10 a.m. to 2 p.m. No other exceptions are included and no off-road use is allowed (see CMRNWF regs); 4. Roads within the monument should be reduced to the minimum needed to serve permitted and traditional uses at existing levels. No expansion of the road system for increased vehicle use should be allowed. Visible identification should be required for permittee vehicles which must travel off-road for permitted activities.
2320	1695	BLM should not allow motor vehicle travel within the monument during the hunting season by outfitters who also are grazing permittees that is not allowed to the general public.
2320	1699	Please keep motorized travel off of undesignated roads.
2320	1702	Please restrict motorized use of the area, upland and on the river.

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2320	1703	I would appreciate reasonable access but as little motorized use as possible.
2320	1704	Please keep vehicles on established roads.
2320	1705	Motorized vehicles within the Missouri Breaks Monument should be restricted to designated routes as recommended by the Tristate OHV decision. User-created roads not present in 1977 should be closed to motorized traffic. The noise and pollution that would result from such motorized use would diminish the experience that most people seek in this wild area. Almost all other areas of the Missouri River are motorized both on the water and on its banks surely preserving quiet on this small stretch is most appropriate.
2320	1706	Certainly not more roads. Open to "getting off" points from which only on-trail, no-road use will be allowed.
2320	1707	The travel plan should confine all motorized land vehicles to existing improved system roads. Routes established by recreational use and other unauthorized routes should be closed to motorized vehicle traffic.
2320	1712	Motorized access must be kept minimal and equitable. Please do not yield to arguments that motorized access is needed. Hunter Behavior Advisory Council in their 12/98 report and final recommendations identified off-road vehicles as perhaps the most serious 'bad behavior' problem in Montana.
2320	1713	To maintain the quiet, primitive nature of the monument, close non-authorized roads and monitor vehicle traffic on the authorized, maintained arteries.
2320	1714	The unroaded portions of the monument (especially the six BLM WSAs and other large and scenic expanses such as the Bullwhacker area) should remain unroaded and off limits to off-road vehicles. In areas where there are roads, vehicles must be required to remain on the roads. In areas where unauthorized roads have been created, these tracks should be closed and returned to natural conditions. Please adopt a closed unless designated open policy for motorized travel. By restricting motorized use to established roads, wildlife and vegetation will be protected, weeds will not be spread, and the natural quiet will be preserved for those who venture in to the Breaks.
2320	1715	The terrain is majestic and beautiful, but also fragile. Riding a trail bike off road, no matter how carefully, will leave tracks that will exist for years. One rider alone given freedom to ride where they wish, and being indifferent to their impact on this fragile environment, could make enough tracks in a month to leave a permanent scar in the area. Imagine dozens, or hundreds, of such riders and we can write the Breaks off as a national treasure.
2320	1717	Motorized vehicles, including all classes of ORVs, should be limited to maintained, designed roads and jeep trails with no off-trail travel or travel on single-track trails allowed. Game retrieval only using motor vehicles could be allowed in selected areas on existing, designated routes that are already wide enough for the intended use.
2320	1718	All travel should be closed unless posted open.
2320	1718	Adequate levels of enforcement need to be applied to travel regulations and those need to be defined in the management plan.
2320	1719	The transportation system should be adequate for private land acreage access, hunting and fishing, agriculture, mining, energy exploration and harvest, and timber harvesting.
2320	1725	BLM must design and implement a transportation system that emphasizes protection of the monument's resources. Roads should be closed to all motorized vehicles unless they are designated open and that needs to be enforced.
2320	1726	Limit all development to only that needed to allow reasonable access, but allow absolutely no off-road vehicle use where not specifically allowed. Enforcement should also be high on your wish list. Restore to their natural state all trails and roads not deemed necessary. Parallel tracks and trails should not be allowed.
2320	1735	Motorized recreation on the land of the breaks monument should be limited to established roads. I hunt there annually and access is currently adequate.
2320	1736	Keep motorized use within the monument minimal while being reasonable and fair to private landowners for agricultural purposes.
2320	1737	Limit motorized use within the area to a few specific signed routes. Do not repeat the experience of many national forests by suffering ATVs and four-wheel vehicles to create de facto roads.
2320	1738	Punish those who negligently and intentionally violate motor vehicle restrictions.
2320	1739	Motor vehicle travel on land in the Monument must be on officially established roads.

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2320	1742	Given the incredible spread of noxious weeds here and throughout Montana, no motorized access should be allowed off of maintained, designated roads. Even then, monitoring should be done for the introduction/spread of weeds and if it is apparent that motorized use is accelerating their propagation, as it seems to everywhere, it should be banned altogether.
2320	1744	There should be no off-road travel permitted. ATV (four wheelers) should be prohibited because it has been shown many times that they cannot be trusted to stay on the roads of the national forests in Montana.
2320	1746	Much of the existing terrain can be managed prohibiting motorized use on land and on the river. Land motor vehicles should be banned in all of the monument except on existing, signed roads (no off-road use). Lack of control of ORV use, and depending on signage to identify banned areas, always leads to abuses to the resources of the land.
2320	1748	The transportation plan, included as part of the management plan, must further the protective purposes of the monument as declared in the proclamation. The BLM should designate a transportation network that allows the minimum amount of routes necessary to provide reasonable access to the monument. The BLM should inventory the objects of historic and scientific interest and other relevant and consistent uses of the land and then determine what roads are necessary and where to place those roads. Motorized vehicle travel should only be allowed on designated routes that are determined during the planning process. Motorized and mechanized vehicle off-road use should be prohibited, except in the case of emergencies.
2320	1751	All user-made roads should be closed and, where necessary, obliterated and scraped to grade. Without road obliteration, removal and closures, wildlands cannot be kept wild.
2320	1753	Jetboats on the river, and dirtbikes and ATVs in the Breaks should be discouraged, except on well established roads.
2320	1754	Minimize motorized use in the monument, with reasonable exceptions and reasonable public access; and maintain only those roads that are necessary to assure that public access is adequate.
2320	1764	Motorized use on the land raises its own problems, including weed dispersal, and displacement of (other) visitors and wildlife.

2320 1767

Roads often have devastating impacts on water quality and fish habitat by increasing landslides, erosion, and siltation of streams. Roads also fragment forests and degrade or eliminate habitat for species that depend on remote landscapes, such as grizzly bears, wolves, and other large, wide-ranging predators (Trombulak and Frissell, 2000). The habitat fragmentation, erosion, and sediment transport associated with roads is a major threat to the integrity of our forest ecosystems. The impacts on watersheds of "pulse" events created by wildfire and naturally occurring erosion are very limited in duration and are the very conditions with which aquatic organisms evolved. Forest road networks, in contrast, are a chronic source of sediment pollution to the watersheds. And disturbances created by management activities can cause high peak flow events from spring runoff and rain-on-snow events that destabilize the streambeds and streambanks, fill pool habitat with bedload sediment, and increase fine sediment input—all further damaging the aquatic environment.

In a Jan. 22, 1998 the Washington Office of the Forest Service (a major land management agency in Montana) found "Only about 40% of forest roads are maintained to the safety and environmental standards to which they were designed." Since road maintenance on BLM lands is also chronically underfunded, the existing road network causes problems that should be dealt with in the RMP. The degree and impacts of sediment problems, slumps, poaching, litter, noise, and other problems are inadequately understood and poorly documented. The degree and impacts of sediment problems and slumps should be well documented. The BLM should monitor and mitigate the hydrological and biological changes roads have caused. Given the scope of the potential road-created problems in the Monument, the BLM should address the problematic features of road segments in affected watersheds, and propose timely solutions.

The reasons for going beyond simple gating or blocking road entrances are many. Those closure methods are often quite ineffective: surveys on public lands have shown closure effectiveness in some areas is as low as 35% (Roads Scholar Project, 1998). Gates are often detoured by ORVs or receive frequent administrative use (Id.), compromising secure habitat for wildlife. For example in one area of Montana, Hammer (1986) found that 38% of the road closure structures were ineffective in restricting motorized use. Platt (1992) found 54.5% overall non-compliance with road closures in grizzly bear areas. Closures of roads in the Selkirk and Cabinet-Yaak Mountains, an area with wilderness areas and other public lands, have been repeatedly violated due to incomplete closure, trespass, and gate vandalism (Knick and Kasworm 1989). Similar impacts on WSAs, roadless areas, and other public lands portions of the Monument should be considered here.

Gate or berm closure methods leave the remainder of the roadbed in place. The resulting impacts to soils, vegetation and watershed function can continue indefinitely. NEPA analyses often far underestimate the impacts of roads upon the affected watersheds. In a letter to the Kootenai National Forest, dated February 6, 1995, entitled: Factors Supporting Road Removal and/or Obliteration, Forest Hydrologist Steve Johnson, states, "Impacts from roads basically fall into three areas: introduced sediment into streams; snowmelt re-direction and concentration; and surface flow production."

In this memo, Johnson discusses how the presence of roads in multiplies peak flow amounts by "snowmelt re-direction and concentration and surface flow production." Analyses should disclose the degree to which roads increase peak flows above the amounts models typically estimate.

Johnson also states, "For the roads we no longer actively use, our dwindling road maintenance budget will make it difficult to maintain the culvert crossings. When these fail during storm and runoff events, tremendous amounts of sediment can be delivered directly to the channel and from there down to lower streams with significant beneficial uses such as sensitive fish habitat."

It is important that the RMP analysis disclose the potential impacts of underfunded maintenance, and how direct, indirect and cumulative effects of poorly maintained impact water quality.

As mentioned above, even a "decommissioned" road does not necessarily have "neutral" hydrological impacts. This is of high concern in portions of the Monument, where treeless vegetation may facilitate illicit, improper or environmentally destructive motorized use. And even with decommissioning the road prism, cutslopes, and fillslopes remain intact—the integrity of the slope is compromised and is susceptible to mass failure, especially on sensitive landtypes.

The RMP analysis should estimate the quantitative elevation in risk of road failure during all phases of road existence as compared to the same slopes without roads.

You should also indicate the degree of the various modes of travel "closed" roads will experience. Since data on effectiveness of closures for the Monument is not apparent, it is important to consider whether closures are frequently violated. To deal with this issue, the BLM should strive to increase road closure effectiveness—in the meantime, thorough monitoring must take place in order to account for the cumulative effects of road density. All NEPA documents should disclose the effectiveness of road closures and trail exclusions of ORVs of those travelways in the analysis area. Another factor to consider is that opening roads will cause snag loss in old growth otherwise not reachable due to firewood cutting.

		<p>"Decommissioned" roads could be at increased risk of mass failure because difficulties in inspecting and maintaining them could be created by the closure methods employed. Recontouring the first 200 feet of each decommissioned road for example, while good to reduce use and thus the impacts of users, would make maintenance almost impossible.</p> <p>It is imperative that both open road densities and total road densities be examined as to the potential effects they will have upon water quality as well as wildlife habitat.</p> <p>Please look for opportunities to perform road rehabilitation work and to repair other sediment sources caused by past management activities in the cumulative effects analysis area.</p>
2320	1768	Consideration should be given to obliterating all non-system roads, and the necessity of all system roads should be evaluated. The fact that these lands are surrounded by a sea of farms and ranches makes it all the more important that this habitat be preserved as roadless land.
2320	1768	In considering keeping the Breaks non-motorized, the BLM should keep in mind its experience since the early 1970s when motorized use exploded from an experimental use of public lands to the situation that exists today where vast areas are exclusive playgrounds for motorized users. Once motorized use is established, many motorized users feel that they have a "right" to such use and it becomes impossible for agencies to reduce the level of motorization even when it is obvious such use is damaging the resource and the public overwhelmingly opposes such use. The time to do it is now.
2320	1770	The first priority which you should address is the control of motorized recreation, both on the river and the breaks uplands. The use of all vehicles, especially ATVs and dirt bikes, should be confined to established, maintained system roads.
2320	1772	Too many roads will destroy the character of the monument. And, given the limited number of enforcement people you will no doubt have, it will be found to be difficult to enforce undue and damaging access. Keep roads to a minimum.
2320	1780	Limit motorized use within the area to a few specific signed routes. Do not repeat the experience of many national forests by suffering ATVs and four-wheel vehicles to create de facto roads.
2320	1781	Limit motor vehicle traffic to authorized, maintained roads. Close roads and user-created routes that diminish the natural values of the monument. I think it is so important to keep motorized use within the monument minimal but allow adequate public access.
2320	1783	When will you simply put your foot down and give us what was on the table? The exasperation of concerned citizens is going to blow up in your face coddling the mechanized, corporate world as you seem to be doing.
2320	1788	What we don't need there is unfettered use of ORVs. Too many areas in Montana are designated as closed but are not enforced as such.
2320	1789	Minimize the number of roads.
2320	1794	There should be no off-road vehicle travel on monument lands. There is no such thing as an off-road vehicle. They are either on a road or are creating a new one. There should be a firm closed unless clearly designated open policy. The number of open roads should be severely limited. Any road without compelling reason for existence should be closed and the land restored. This is especially true in and near WSAs (and areas that ought to be), and near the river corridor within sight or hearing of floaters.
2320	1795	Please protect the area from massive use by vehicles and minimize the number of roads so as to prevent it from being overrun by motorized vehicles.
2320	1796	Limit public access roads in the monument area. Our wildlife must have their space for propagation and privacy. I have seen snowmobile travel ruin deer yards and elk wintering ground.
2320	1798	Supports a policy that prevents motorized vehicles, especially ATVs and dirt bikes from desecrating the landscape.
2320	1799	Limit motor vehicle traffic to authorized, maintained roads only, but work to ensure that public access to the boundaries of the monument is adequate and reasonable.
2320	1800	Limit motorized vehicle access to authorized roads only. User-created roads and routes should be closed. These demean the natural value of the monument.
2320	1803	Close off roads, trails & motor ways to motorized traffic.

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2320	1803	Protect the Monument's resources by closing the roads that are not needed.
2320	1804	It is up to the BLM as managers of these public lands to restrict motorized use both on land and water. Otherwise such use will surely only increase in the next few years as the Monument receives more and more nationwide visitation and as motor users are further encouraged by a lack of restrictions.
2320	1805	Provide low-standard vehicle access to the boundaries; no more paved roads than exist today.
2320	1805	Limit motorized use within the area to a few specific signed routes. Do not repeat the experience of many national forests by suffering ATV's and four wheel vehicles to create de-facto roads.
2320	1806	I believe that motor vehicles of all types should be limited to maintained roads, with all the 4 wheeler created roads closed permanently and the rules rigidly enforced.
2320	1807	There is sufficient access to the river now using already established roads.
2320	1808	In the uplands of the monument, user created roads should be closed and motorized traffic limited on authorized maintained roads.
2320	1808	It is important that you insure public access while keeping motorized use to a minimum.
2320	1809	Non-motorized travel should be emphasized within the Monument. Motorized travel, both on water and land, is a major threat to the primitive character of the area. Only essential roads should remain open. There should be a firm road policy of "closed unless clearly designated open" within the Monument. The two track, non-system roads should be closed and restored as trails for foot and horse travel with pull-out areas at the trailheads for vehicles. Essential roads should be severely limited. All roads in Wilderness Study Areas and the land separating them should be closed to maintain the wilderness quality of the area in anticipation of full Wilderness designation.
2320	1813	With designation of specific roads for motorized vehicles, better protection of wildlife will be provided. The designated road plan would also apply to the entire river corridor. Strict enforcement would be a priority.
2320	1815	The use of dirt bikes and ATVs should be confined to officially established and maintained roads. Roads which diminish the natural values of the monument and unauthorized routes (created by renegade motorists) should be closed to motorized traffic. There should be an adequate budget for the strict enforcement of the closures. Motorized use within the monument should be minimal.
2320	1816	Minimize roads and prohibit motorized travel.
2320	1817	Keep all recreational vehicles on designated roads only. No special routes for ATV's or specialty vehicles.
2320	1818	Close the area to vehicle travel. If ranchers want to tend their livestock let them ride horses. Arrange with ranchers/outfitters public access routes. Provide trailheads for all users. Where practical dig up and replant existing roads in the area.
2320	1818	Local ranchers/outfitters use the area for grazing and wildlife hunting. There are two-track roads all over the area. I've been on them many years ago. There are dozer constructed dams and water pits. The ranchers treat the area as if they owned it.
2320	1821	Motorized use should be strictly limited to established system roads, two-tracks and other unauthorized routes should be eliminated.
2320	1829	Off-road vehicle use must be addressed. A road plan must be established and all of road vehicle use must be excluded.
2320	1832	I'm writing today to emphasize nonmotorized travel within the monument.
2320	1836	Use of all vehicles, especially motorized should be confined to established, maintained system roads. User created, two tracks should be closed and rehabilitated to natural contours. Reseed with appropriate native species.
2320	1840	The current road network is too extensive, lacks enforcement, and leads to degradation of the resource. Reduction of the road network will substantially aid in preserving objects of biological, historical, and paleontological interest.

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2320	1843	The established access points are sufficient and no more should be added. There are several private points of entry that are at the disposal of the owners. Whether or not these sites should be allowed for commercial use, such as by outfitters, is a point of contention and must be addressed.
2320	1844	Not is it fair that the private property of the farmers is included in the Monument but old residents like us are not permitted beyond a locked gate. We old people would just like to drive in for a picnic and fishing like the old days. Thomas was good enough to fight in the Philippines but not permitted to drive to the river when he is old. Elderly access is demanded on private buildings but not government parks.
2320	1845	We need to have our access roads to the area to check on fences, cattle and other problems that come up.
2320	1854	Do not permit any ORV, snowmobile, motorized equipment, or vehicles of any type off-road travel anywhere, anytime. Designation of the entire Breaks NM as closed, unless designated and signed open must be effected as part of this plan.
2320	1854	Close all avowed trails, roads, troads, ways, routes, etc. within the wildlands known as the monument as a critical part of the plan, with the rare exception of only those specifically justified trails, roads mandated to remain open by the proclamation for the limited uses of internal land ownerships. This specifically includes all motorized, mechanized equipment, vehicles of all types and purposes permanently and year round. No exceptions.
2320	1854	All trails, roads, troads, ways, routes, etc. within the wildlands known as the monument must be designated closed unless designated open.
2320	1854	Do not apply the terribly flawed and illegal joint BLM-FS "Tri-State ORV Mgt Plan" criteria/policy recently developed within Montana and the Dakotas.
2320	1854	Eliminate all oil and gas exploration/development trails, roads, troads, ways, routes within the monument illegally created or modified within the monument, and/or resultant of terminated or out-of-date oil-gas leases. Do now.
2320	1854	Require the lessee-builder or the current lease holder to finance elimination and restoration to pre-construction condition all oil-gas exploration/development trails, roads, troads, ways, routes within the monument.
2320	1854	Mandate clearly identifiable motorized vehicle, equipment licenses, identification, etc. within the Breaks NM so that violators can be publicly identified and eliminated. Post signs at Breaks NM boundary that clearly mandate a specific and functional equipment, vehicle identification system clearly identifiable at a distance by the public.
2320	1857	A good management plan would prohibit motorized vehicles from cross-country travel and from all trails. Because of the high clay content of the soil tire tracks make large, lasting impressions, which opens areas where noxious weeds can get in a foothold. When that type of soil is wet vehicles get sucked into the mud. With the increasing interest in ATVs the area will be filled with mud holes and tire tracks left from vehicles trying to free themselves of the mud. Land managers may look at the area and amount of use today and decide it is not a problem, but the management plan must plan for the amount of use in five or ten years from now.
2320	1860	Motorized vehicle access must be restricted to essential, established roads. This does not include the two-track ORV trails that are currently found throughout the upland breaks. These roads should be closed. Roads should be closed to all motorized traffic unless designated open.
2320	1863	To limit damage to the resources, four-wheel drives and ORV use should be restricted to designated routes. Unauthorized and user-created routes should be closed. The Monument as a whole should have a "closed unless posted open" policy for ORVs.
2320	1864	Restore old, user created routes to natural grass where such routes are not needed for administration of the monument.
2320	1864	Limit motorized traffic. Only authorized roads should remain open for motor traffic. Routes should be closed unless designated open. Open routes should be determined by considering whether administration of the Monument requires the road or whether the road is necessary access to private land. No user created trail or old 2 tracks which were used for gas exploration are administratively necessary. Limit motorcycles and ATVs to designated roads.
2320	1864	Identify areas where users may drive off designated routes for a short distance, e.g. 20 feet in order to set up camp. There should be no cross country vehicle use for the purpose of camping.
2320	1867	Inventoried and uninventoried road density should not be permitted to increase and should be reviewed for possible reduction. Motorized access should be closely monitored with roads/trails closed to motorized (and foot, if needed) access unless signed otherwise. Motorized access in the Wild and Scenic River Corridor does not seem to be a good idea.

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2320	1869	The Monument should be managed to protect its relatively pristine character. This means that development should be kept to an absolute minimum and motorized traffic should be confined to the existing improved roads. This does not include 2-track roads carved by repetitive ORV use.
2320	1879	I support limiting motorized traffic to designated routes only. If a route is not designated, it should be closed.
2320	1882	Off highway vehicles should be limited to established roadways. I had occasion to observe OHV damage far from any road.
2320	1885	The purpose of this letter is to ask you to restrict motorized travel within the N.M. to authorized, maintained roads. We must stop off-road travel and the abuse it brings with it, or the character of this area will suffer irremediable harm.
2320	1887	I would also like this area to be designated as a roadless place. In the future these quiet places are going to become more and more valuable to our future generations. We so not need more roads for ATVs, dirt bikes, motorcycle or powerful four wheel vehicles driving over challenging land or streams.
2320	1889	Carefully manage vehicle roads. Allow new roads after thorough review and determine the best benefit for the public overall. Road development should be kept to a minimum and be for recreation access such as hiking, backpacking, fishing, hunting and the like. Disallow offroad vehicles such as motorcycles and all terrain vehicles. Snowmobiles are probably not an issue here but I would be against them also on the off road basis. Horse traffic should be allowed. It is traditional.
2320	1891	Off-road vehicles need to be controlled, maybe prohibited if they cannot abide by the laws requiring them to stay on established roads. Many established roads or trails should be closed, there are currently far too many running all over the monument lands. Too many roads and vehicles lead to considerable damage to the landscape, can affect wildlife, weeds, and obviously the quiet solitude of this wonderful natural place.
2320	1892	After having hiked over some of the badlands area, it is clear how friable the soils are, and how easily damaged. All vehicles should be limited to main roads, tracks overall should be closed, and cross-country travel done away with. There are plenty of other areas for 4 wheelers to tear up.
2320	1896	Public access to the area must be ensured but not developed to the detriment of the sense of primitive/minimal development or wilderness. Any proposal to pave any road that leads to the River should be considered with the greatest care and with full regard for the impact of increased use that will attend such a decision. Motorized travel within the Monument should be kept to the minimum needed for administrative needs and public safety and to allow necessary livestock maintenance and access to private lands over authorized roads. De facto roads on public lands created solely by use should be closed lest the perception of wilderness be destroyed.
2320	1897	The only motorized travel anywhere within the boundaries should either be official vehicles, search and rescue outfits, or inholders traveling on fenced-in roads to their private land or on private land. Motorized vehicles of all kinds are the most destructive agents in an area that should remain remote and as close to the character of the land the Corps of Discovery saw as possible.
2320	1898	Minimize motorized traffic within the monument and on the river. I believe that ATVs and motorized water craft detract from the quiet and primitive feeling one experiences when visiting the monument and would create stress for the wildlife in the area.
2320	1899	By strictly enforcing, limiting, and monitoring all motorized travel in and around the breaks, we can insure that wildlife and the vegetation can maintain and prosper in this delicate landscape. As we have witnessed in other "wonderlands" in and around this beautiful state, once motorized traffic is allowed to enter then even when it is blatantly obvious that the damage they create is astronomical, it is next to impossible to remove them.
2320	1901	I would favor limiting motor vehicles to as few as possible of the currently established, maintained roads and preventing user-created roads from becoming established.
2320	1905	Motorized vehicles should be confined to established roads; user-created roads should be closed to motor vehicle traffic.
2320	1907	motorized vehicles of any type should be permitted only on designated roadways. Any "user-created road" should be closed.
2320	1908	We definitely believe in no off road vehicles anywhere!
2320	1913	BLM should allow only the minimum necessary roads for management of the monument. Vehicle use of dirt tracks and trails should be prohibited so that further damage can be prevented, and the monument can begin to heal.

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2320	1915	Reduce the number of roads in the in the Monument that currently exist. Manage the use of vehicles so as to provide for the most wild experience possible.
2320	1917	I support the limitation of motor vehicle traffic in the uplands of the monument.
2320	1918	Similar restrictions should also be instituted on road transportation. There are currently too many roads in the Monument and too little management of motorized use.
2320	1920	Include restriction son motorized vehicles and boat use.
2320	1921	Of course all travel should be non-motorized.
2320	1924	The final RMP should provide for a Monument transportation system that relies on science to determine road retention and closure and the protection of natural and historic resources. There are too many roads in the Monument today and too little management of motorized use. The RMP should include solid provisions for monitoring and enforcement.
2320	1925	Implement such rules as prohibiting ATVs and other motorized off-road vehicles that disturb the land and animal habitats.
2320	1930	It is important that motorized use of the monument not dominate.
2320	1931	Roads should be reduced in number and their usage more tightly regulated to limit maintenance costs and damage and disturbance to surrounding land and inhabitants.
2320	1932	ORVs should have to stay on designated routes. These routes should be limited in number. The RMP should include strict provisions for monitoring and enforcement.
2320	1933	Reduce the number of roads in the monument and the excessive motorized use. The plan ought provide for meaningful enforcement and monitoring of this use.
2320	1935	I believe this area should be managed as wilderness as much as possible, with no new road building and protection of all existing roadless areas. Road usage should be tightly managed, with road closures where necessary to protect the local ecosystem.
2320	1940	There are already too many vehicles and unrestricted traffic of various kinds and your plan must include enforcement and control of this aspect.
2320	1940	The number of roads must not be increased and maintenance must be done with consideration and scientifically and ecologically sound practices.
2320	1946	Eliminate dirt bikes, off-road vehicles, snowmobiles and motor watercraft.
2320	1951	All user-created roads and two-tracks should be closed. The BLM should adopt a national monument transportation plan that emphasizes non-motorized enjoyment and use of the monument.
2320	1952	Provide for a monument transportation system that determines road retention and closures based on science and the protection of natural and historic resources. The RMP should include solid provisions for monitoring and enforcement.
2320	1953	Part of the plan should restrict road development in a scientific manner so that access roads are maintained while restricting new road development. Motorized vehicles need to be controlled and that includes enforcement provisions, staff to control that and some sort of meaningful penalties that will serve to restrict access where appropriate.
2320	1961	Motorized vehicle and watercraft traffic should be kept to an absolute minimum.
2320	1963	The road network should provide access to the area, not all over the area.
2320	1965	The RMP should include solid provisions for monitoring and enforcement of these non-motorized roadways and areas.
2320	1966	Provide for a monument transportation system that closes no existing roads or trails and provides a multiple use access for all the public. The RMP should include solid provisions for signing, monitoring and enforcement for multiple access.
2320	1968	ORV and motor bike use should be restricted to designated roads.

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2320	1972	Traditional access routes, roads and trails should be kept in the monument. There should not be restrictive zoning in the monument to achieve de facto "wilderness-like" areas.
2320	1973	Design access that doesn't assault the resource.
2320	1975	The plan should prohibit establishment of any new roads and trails other than any that may be necessary for administrative purposes and prohibit off-road and off-trail motorized use.
2320	1976	Off road and trail vehicle travel should be prohibited in the Monument. Site-specific plans should be developed, closing most vehicle trails, taking care that public access into the area from private lands is not restricted. Roads that are blocked by private landowners should be closed to all users, particularly to that private landowner.
2320	1978	Preserve the roadless natural characteristics of the Monument by prohibiting the construction of new roads, and prohibit the upgrading of existing roads. Close existing roads that are determined to damage land or water resources, conflict with wildlife management, interfere with maintenance of wildlife habitat or which are determined to be inconsistent with the area's overriding managerial purpose. Restrict ORV use from ecologically and culturally sensitive areas, and limit ORV use to suitable designated routes that will result in the least possible impact on the environment or impairment to other legitimate uses of public properties.
2320	1978	Prohibit placing trails and recreation facilities in riparian areas.
2320	1978	Evaluate roads and road construction as channels for the spread of weeds and motorized vehicle travel as the vector.
2320	1982	Off-road use should be more closely monitored and many roads closed. There is no need for a labyrinth of roads in this area.
2320	1985	The RMP should provide for a Monument transportation system that relies on science for decisions on road retention and closure and must focus on protection of natural and historic resources. There are too many roads in the Monument today and too little management of motorized use. The RMP should include solid provisions for monitoring and enforcement.
2320	1987	Keep existing roads as is—do not expand them. Keep existing trails; expand them only if they will not adversely affect the wildlife, nor will they not adversely affect the highly erodable soil.
2320	1989	If you don't want the nightmare that Yellowstone has become, be smart and devise some kind of transportation system based on protection of natural and historic resources.
2320	1990	I urge you to develop a transportation plan that allows maximum access while preserving the Monument's resources. The transportation plan that the BLM will write should leave open roads and "trails" and "ways" and any other words for routes of travel. Maximum access for all people should be allowed. These are our public lands. Most people need to use a vehicle to gain access to areas like the monument. Please note that I am not asking to allow "off-road" travel.

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Off-road vehicles must be limited to roads specifically designated for their use following appropriate analysis under the National Environmental Policy Act (NEPA) and public comment. The Presidential Proclamation creating the UMRBNM prohibits cross-country motorized travel, and BLM must act to implement this directive.

BLM should adopt a "closed unless posted open" policy, which would allow off-road vehicles to be used only on roads specifically marked with signs as "open" to such vehicles. All designated roads within the Monument should be appropriately signed as open or closed to off-road vehicles. Posting such signage is required under BLM regulations (43 CFR 8342.2(c)). This principle should not be interpreted to suggest that appropriate signage is a substitute for other enforcement actions.

The BLM should not use categorical exclusions to shield from NEPA review actions related to off-road vehicle use, including, but not limited to, the construction of facilities to support such use or maintenance of any portion of a designated road system that is open to off-road vehicles. These activities have significant individual and cumulative impacts on the human environment which mandate NEPA analysis.

Off-road vehicle use is prohibited in legislatively designated wilderness and should be prohibited in proposed wilderness areas, inventoried roadless areas, and in Wilderness Study Areas (WSAs). Under federal law, WSAs must be managed to retain their wilderness characteristics. The prohibition of motorized travel in these areas is permissible, and often necessary, if it protects these characteristics.

No part of a designated road system should be made available for off-road vehicle use unless the BLM has the staff and budgetary resources to effectively monitor the impacts of and to enforce existing laws and regulations related to such use.

2320 1991

Based on the widespread, serious and long-lasting impacts associated with off-road vehicle use, developing an effective and legally sound travel management component of any Monument plan will be absolutely crucial to safeguarding the historic, scientific and other objects of interest for which the UMRBNM was established. In developing such plan, the BLM should follow the principles below:

As noted above, the BLM must address off-road vehicle management as part of the RMP. According to BLM regulations (43 C.F.R. § 8342.2(a)), off-road vehicle designations must be made through the resource management planning process. Therefore, the BLM cannot defer such decisions to future implementation or activity level plans and decisions.

BLM must regulate off-road vehicle through the land use plan consistent with the Presidential Proclamation that established the Monument. The Proclamation creating sets forth the fundamental tenet of travel management as follows: "For the purpose of protecting the objects identified [above], the Secretary shall prohibit all motorized and mechanized vehicle use off road, except for emergency or authorized administrative purposes."

In developing any proposed transportation system, the BLM must ensure that such system or systems further the protective purposes of the National Monument and must determine that each road included in the system(s) is necessary for specified and defined uses of the Monument. Only those roads that meet these requirements should be included in proposed transportation system(s) presented to the public for comment as part of a draft EIS and draft RMP. We have included (only in comments submitted via U.S. mail) a white paper developed by The Wilderness Society which describes the legal, regulatory and procedural requirements which mandate this approach and how proposed transportation systems should be presented to the public for review.

BLM must establish a set of criteria to determine the circumstances under which off-road vehicle use on designated roads might be authorized. Use of designated roads by all-terrain vehicles, dirt bikes, and other off-road vehicles can lead to illegal off-road use and abuse. Criteria for designating roads open for off-road vehicle use should include the following:

1) Roads within the monument must be limited to "roads" based on the definition derived from the legislative history of FLMPA which states: "The word "roadless" refers to the absence of roads which have been improved and maintained by mechanical means to insure relatively regular and continuous use. A way maintained solely by the passage of vehicles does not constitute a road." (H.R. Rep. No. 94-1163 at 17 (1976)) Roads within the monument, therefore, must have been "improved and maintained by mechanical means to insure relative regular and continuous use. A way maintained solely by the passage of vehicles does not constitute a road."

2) In addition to being consistent with this definition, a travel way that might be considered a "road" must meet at least the following criteria: a) it must have been specifically authorized and planned by the BLM prior to use; b) it must have been subject to NEPA analysis and public comment prior to use; c) it must have been continuously monitored by BLM to ensure that use has not and will not cause considerable adverse effects on natural resources; and d) it can only be made available for a purpose specifically authorized by the Presidential Proclamation.

The development of criteria for determining what constitutes a road must be a first step in the travel planning process. Any and all documentation of roads within the Monument, including, but not limited to, aerial and ground surveys, GIS analysis or mapping, can only begin after criteria are proposed, subject to public comment and finalized as BLM develops criteria to guide the larger planning effort pursuant to 43 CFR 1610.4-2. This process can and should be completed as part of the scoping phase. The need to develop these and other planning criteria should not be used as an excuse to separate travel planning from the overall resource management plan development process.

The BLM may only designate roads available for off-road vehicle use based on a set of objective and legally-based criteria (see discussion above), NEPA review and public comment—it can not merely adopt any or all "existing" travel ways as "designated" roads for the purpose of complying with the Proclamation. The vast majority of existing travel ways are unlikely to have been planned or authorized by BLM in advance of use and/or subject to the required NEPA review. Therefore, for the most part, they are illegal. Reclassifying existing travel ways as "designated" roads would reward illegal actions, fail to satisfy the basic requirements of NEPA, agency regulations or Executive Orders, and violate the letter and the spirit of the Presidential Proclamation that established the Upper Missouri River Breaks National Monument.

Off-road vehicle use has a myriad of impacts that must be carefully assessed during the planning phase and continuously after any management regime has been formally adopted. During the process of developing a draft Resource Management Plan (RMP) and draft Environmental Impact Statement (EIS) for the UMRBNM, the BLM must systematically evaluate these impacts and make management recommendations based on the following regulatory requirements:

Any road designated for use by off-road vehicles "shall be located to minimize damage to soils, watershed, vegetation, air, or other resources of the public lands, and to prevent the impairment of wilderness suitability." (43

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Any road designated for use by off-road vehicles "shall be located to minimize harassment of wildlife or significant disruption of wildlife habitat. Special attention will be given to protect endangered or threatened species and their habitats." (43 CFR 8342.1(b))

Any road designated for use by off-road vehicles "shall be located to minimize conflicts between off-road vehicle use and other existing or potential recreational uses of the same or neighboring public lands, and to ensure the compatibility of such uses with existing conditions in populated areas, taking into account noise and other factors." (43 CFR 8342.1(c))

Any road designated for use by off-road vehicles "shall not be located in officially designated wilderness areas or primitive areas. [A road] shall be located in natural areas only if the authorized officer determines that off-road vehicle use in such locations will not adversely affect their natural, esthetic, scenic, or other values for which such areas are established." (43 CFR 8342.1(d))

BLM must consider whether or not off-road vehicle usage is likely to increase in the Monument during the time period to be covered by the RMP and then develop a draft RMP based on that assessment. The draft RMP should identify recreational carrying capacities and thresholds beyond which mitigation measures, such as road closures or other restrictions, become necessary to protect the objects of scientific and historic interest and the experience of other visitors.

2320

1992

On land, motorized travel must be restricted to authorized, maintained system roads. No user-created trails or two-tracks should be allowed. All "roads" but authorized system roads should be closed to motor vehicles. There is no need to examine the land two-track by two-track prior to closing them for travel.

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2320	1996	<p>All motorized and mechanized travel should be confined to designated routes.</p> <p>Roads should be justified and managed with the proper level of NEPA analysis (centered on the objects of scientific and historic interest) taking into account the spatial pattern of roads, not merely mileage.</p> <p>No road improvements, only maintenance. Closure, rather than maintenance, should be considered on roads that pose unnecessary safety hazards. The Knox Ridge Road resurfacing is by definition a road improvement, rather than a maintenance activity, intended to increase access and visitation. This action is inconsistent with the Proclamation and fails to protect Monument resources.</p> <p>Roads open for administrative use, or right of way to a lease or private property, should be used solely for that purpose.</p> <p>Roads should be in compliance with various historical and archaeological protection laws.</p> <p>Anything identified as a "road" in the draft plan must meet the legal definition of a road as "improved and maintained by mechanical means to insure relatively regular and continuous use. A way maintained solely by the passage of vehicles does not constitute a road."</p> <p>The BLM should recognize that the transportation plan for the Monument is a unique plan for this particular protected area. The blanket standards set forth for BLM lands in the Tri-State plan (BLM/USFS Jan. 2001) should not just merely be adopted for the Monument, as it is a BLM holding of special significance and protective status. The transportation plan should reflect this.</p> <p>The BLM should locate designated travel routes in a manner that minimizes habitat fragmentation and wildlife disturbance.</p> <p>Travel routes should avoid sensitive habitat such as big sagebrush, riparian areas, and critical winter, birthing, or mating grounds.</p> <p>Travel routes should avoid introducing human activity into sensitive habitat features.</p> <p>The Transportation Plan should not make objects of historical, biological, or paleontological significance travel route destinations. Increased access to these objects will lead to increase degradation and/or vandalism (BLM/USFS Jan.2001).</p> <p>Designated travel routes should limit breeding bird disturbance by providing buffers of at least 1.5 km around sharp-tailed grouse leks and 3 km around sage grouse leks and away from raptor nest sites.</p> <p>Reclamation procedures and standards must be incorporated when closing roads and routes that are not justified, are no longer necessary, or do not meet the definition of a road. Restoration of these roads not included in the Transportation Plan should be undertaken as soon as possible, and the BLM should earmark a portion of its budget each year for this purpose.</p> <p>The Bullwhacker area, with its important wildlife habitat, unparalleled primitive hunting opportunities, and strong wilderness character, should be given special emphasis as an area where roads should be minimized.</p>
2320	1996	The BLM should include noise pollution as an impact when considering the effects of any proposed activity.
2320	1996	The Transportation Plan should implement a "closed unless designated open" road policy. Maps of these routes should be readily available to visitors. Instituting an "open unless designated closed" policy is difficult to enforce due to the potential for the closure signs to be removed. Data from other federal lands demonstrate this (BLM/USFS Jan. 2001). Transportation enforcement should be prioritized and funded in proposed wilderness areas, inventoried roadless areas, and wilderness study areas.
2320	1996	Designate a road system in the Transportation Plan that emphasizes protection of Monument objects and resources and is based on scientific review.
2320	1996	The BLM should limit motorized travel in the Monument to the minimum amount of designated roads possible. These roads should be selected based on the protection of Monument resources, including the lack of noise pollution.

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2320	1998	I would like to see all roads and trails left open to all kinds of travel and use; none should be closed for any reason. An example is the wagon wheel trail that begins on the Dick Wilson property, goes off the Missouri rim and travels up the Missouri River to an old homestead called the Brinks place (I believe). The Breaks are full of these kinds of trails and all should be eligible to be maintained and used to service the area. They are important for fire control and livestock management.
2320	1999	Roads must not be closed to allow for emergency services and fire suppression.
2320	2001	Reduce habitat fragmentation by eliminating non-essential and user-made roads. Eliminate user-made roads within WSAs to comply with DOI directives regarding WSAs. Travel planning should aggressively ensure that the integrity of the resource be left intact; primitive travel corridors should not be replaced by high-speed roads, motorcycle or ATV trails. Corridors built to facilitate oil and gas drilling should not be included in the travel infrastructure and will be reclaimed as soon as feasible. Travel corridors and pad locations contribute to a "disturbed land" condition that encourages noxious weed infestation. OHV use is to be limited to existing designated open trails and roads; post signs and distribute brochures outlining available open trails to minimize abuse of this restriction. Recreational vehicles introduce and encourage weed growth.
2320	2005	ORVs and motorcycles should be prohibited.
2320	2009	Attachment B is roads to abandoned gas wells that should be closed (see letter).
2320	2009	User-created routes and other unauthorized routes should be closed to motor vehicles. All roads should be closed unless designated open.
2320	2009	Unauthorized surface disturbance is the largest threat to the integrity of the WSAs.
2320	2009	Trappers want to drive everywhere on their ATVs. This is one of the biggest problems in the monument. No driving off established roads except in emergencies. Retrieval of game is not an emergency.
2320	2010	BLM should not build new parking areas or turnouts unless deemed absolutely necessary and only after accounting for natural, cultural and scenic values and minimizing all adverse impacts to said values. In general, new parking areas or turnouts should be presumed unnecessary.
2320	2010	BLM close and reclaim informal (unofficial or undesignated) parking areas.
2320	2010	Limit vehicular speed.
2320	2010	As part of monitoring, BLM undertake relevant transportation studies to understand how increased visitation impacts natural resources.
2320	2010	BLM not upgrade existing routes or build any new routes.
2320	2010	BLM must use only the "closed" and "limited to designate roads" off-road vehicle designation categories, as set forth in 43 C.F.R. Part 8340, operating under a "closed unless posted open" policy whereby ORVs are allowed only on designated and explicitly signed roads in the National Monument.
2320	2010	BLM must specify the locations, terms, and conditions for all emergency and authorized administrative motorized and mechanized use and analyze the impacts – especially cumulative impacts – of such use within the EIS and close administrative routes once the administrative purpose ends.
2320	2010	Such a plan must consider road closures and travel restrictions. The RMP should not only close roads and impose travel restrictions, as appropriate, immediately upon completion of the RMP, but also outline the conditions that will trigger future road closures and travel restrictions. We assert that the National Monument contains a more than sufficient road network and that the construction of new roads is, generally, unnecessary. In fact, we believe that the BLM should close roads within the National Monument, predicated such decisions on the spatial pattern of roads – not merely mileage – and associated impacts in order to protect National Monument values.
2320	2010	The BLM should establish a travel system that retains the minimum amount of routes necessary to provide for reasonable access to public lands. Extraneous, little used, unauthorized, and unjustified routes should be closed within a defined time period through a defined process.
2320	2010	The travel systems should differentiate "roads" from "trails" by using the legal definition of "road" as derived from the definition of "roadless" in the legislative history of FLPMA (H.R. Rep. No. 94-1163 at 17 (1976)).

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2320	2010	Recreational off-road vehicle use on designated roads must be authorized only after the BLM fully applies the off-road vehicle designation criteria set forth in 43 C.F.R. § 8342.1.
2320	2010	Travel management decisions – especially specific road designations – must be made at the RMP level and not deferred to subsequent travel management planning.
2320	2010	BLM encourage bicycle transportation or walking instead of vehicle use within high-use areas.
2320	2010	BLM must consider the impacts of existing roads in ecologically sensitive areas and consider their removal (or reconstruction with appropriate mitigation measures).
2320	2012	Do you want more or fewer roads? About the same. Allow ranchers to maintain roads and trails for management and access to private land. Allow recreationists traditional access sites.
2320	2013	We are greatly concerned about the continued reduction of multiple use, motorized access and motorized recreation opportunities on public lands and feel that this trend is grossly out of step with the needs of the public. The project lands were designated as multiple use lands. Management for multiple use is responsive to the needs of all citizens including motorized recreationists. We have compiled issues and concerns (see letter) and request that these issues and concerns be included in the project record, and fully evaluated and incorporated into the analysis and preferred alternative.
2320	2021	Competition, using motorized vehicles, shall meet the requirements and obligations of the monument, which are to preserve and protect.
2320	2021	Restrict the road system to only those “roads” absolutely necessary for the proper functioning of the Monument. To be a “road” it must be “improved and maintained by mechanical means to insure relatively regular and continuous use.” Others should be decommissioned. A “closed unless designated open” road policy should be implemented. Roads open for administrative use or right-of-way to a lessee or private property, should be used solely for that purpose without impairment to the resource. Existing uses are those which were in effect at the date of the proclamation. If rights-of-way become formalized they are to applicant only. Applications and granting of rights-of-way are to an individual. If the lessee sells, the new owner must re-apply. No road improvements, only maintenance. Closure, rather than maintenance would be considered on roads that pose unnecessary safety hazards.
2320	2027	On the public lands within the national monument, every effort should be made to minimize the number of roads, eradicate user-created motorized routes and two-tracks, and limit motorized recreation vehicles to established, recognized roads. Once again, the idea of balance and fairness should be considered. There are too few landscapes in eastern Montana where motorized recreation is not occurring. If motorized use in the Missouri Breaks is not limited as much as possible, what was the purpose of protecting the area as a national monument?
2320	2028	Historical access has relied on existing roads and trails, the Montana Trappers Association requests that all existing roads and trails be kept open. There are many tracts of state land within the boundaries of the Monument that are being trapped under special land use licenses, issued by the DNRC. Many of those tracts have access crossing BLM lands. The MTA asks that all those roads be kept open to allow the licensee access to trap those lands. The MTA further requests that no seasonal closures of any existing roads or trails be implemented, as this would severely impact the accessibility of the land.
2320	2029	With the mixed publicity of the Lewis and Clark journeys and their minimal observable tracks, I personally have no intention of traveling and tramping to view where they supposedly hiked. I really doubt that crowds will justify any big improvements to land or roads.

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2320	2032	The BLM must demonstrate that any road designated as "open" to motorized vehicle use conforms with the conservation mandate articulated in the proclamation. All other routes, travel ways, trails, etc. should be closed to motorized vehicles and designated as non-motorized trail or restored to a natural condition. Under the Interim Management Plan motorized vehicles are restricted to established roads to prevent damage to natural resources. While the restriction is helpful in managing vehicle use, it is largely ineffective in areas such as the Bullwhacker, Cow Creek and Antelope Creek, which are laced with "vehicle ways" currently defined as roads. As a result, motorized travel is uncontrolled throughout the upland breaks. With cross-country, off-road vehicle (ORV) use increasing this is a problem that will only worsen. Most of the routes currently defined as roads by the BLM lead to abandoned gas wells and should have been restored to a natural condition years ago. Motorized travel in the monument should be determined by where it is needed and not where it currently exists. Effective, enforceable protective actions can only be accomplished by restricting the road system to only those roads absolutely necessary for the proper functioning of the Monument. A "closed unless designated open" road policy should be implemented for visitor guidance.
2320	2032	Travel projects which make improvements (rather than maintenance) on existing road conditions in order to increase access and visitation, such as the Knox Ridge Road resurface (Missouri Breaks Backcountry Byway), are not in accordance with the Proclamation. Where appropriate, trailheads with pull outs for vehicles should be created and existing primitive two-track vehicle ways should be restored as trails for foot and horse travel.
2320	2033	On the public lands within the monument, motorized recreation vehicles should be allowed only on well-established, maintained roads. They should not be allowed on roads that are not part of a necessary transportation system, and they should not be allowed on any of the many two-track paths that have been cut into the Missouri Breaks landscape.
2320	2033	The management of motorized recreation is the most important issue to address for the national monument. Because the monument was established to protect the natural and historical legacy of a largely undeveloped region of central Montana, the use of motorized vehicles within the monument should be kept to a minimum.
2320	2035	While it is important to properly manage off highway vehicle (OHV) use and other forms of transportation, in many cases permit holders use these vehicles to maintain fences, distribute salt and mineral, check livestock on grazing allotments and access private lands within the monument boundary. Any discussion pertaining to the use of OHVs and other forms of transportation should be examined on a case-by-case basis and should not be subject to a blanket ruling. Restricting OHV use and other forms of transportation would make it extremely difficult for permit holders to maintain the level of standards they are now demonstrating on these allotments.
2320	2036	Provide low-standard vehicle access to the boundaries; no more paved roads than exist today. Limit motorized use within the area to a few specific signed routes. Do not repeat the experience of many national forests by suffering ATVs and four-wheel vehicles to create de facto roads.
2320	2038	Presently, the interim plan implies that there can be no off-road travel in the monument. A few exceptions are in order. 1. Travel during the hunting season to retrieve big game. 2. Travel within 300 feet of an established road to permit camping in the monument area.
2320	2038	As a minimum, the BLM must coordinate with county commissioners in the four-county area of the monument and determine the roads, trails and access points the counties desire to assert claim to under the RS 2477 rule and keep open to the public. Any public road or access area the BLM desires to close must be made available for public comment and review by commissioners of the four-county area.
2320	2040	Enclosed is a copy of an ad for an ORV "landing craft." Guess where people will want to use this motorized assault vehicle! The BLM should make an immediate and unequivocal statement that ORV access from the river corridor is prohibited in the monument. Can you imagine the damage that a couple of ATVs could cause after exiting a landing craft at a convenient beach in the wild and scenic Missouri? Please put a stop to this threat before it becomes a use and a problem.
2320	2042	No roads should be closed in the monument, except in "natural areas" or where the danger of excessive and unnatural erosion is evident. Any road closed for such reasons should be replaced with a new road having a comparable route to the same destination.
2320	2044	The most pressing problem, in my mind, is the increasing use of off-road vehicles that the BLM has failed to address, even though it participated in the tri-state OHV plan that was developed in conjunction with the regional Forest Service, but the BLM has yet to publish in the Federal Register. This is not a promising example of the ability of the BLM to step forward and take responsibility for the protection of public lands. I would ask that you seriously analyze the effects of off-road vehicle use and restrict this use in the monument to authorized and maintained roads. Keep motorized use to a minimum for environmental and economic reasons by closing roads and user-created trails that diminish the natural values of the uplands. Instead, allow adequate access to the boundary, so that the public can enjoy the solitude and natural integrity of the area via foot trails.

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2320	2046	Closing historical roads will restrict many people from seeing and enjoying the river. This really affects local people. Many elderly "old timers" that have lived in the area for many years often go to the river on a Sunday afternoon for a few hours. Also locals and others canoe or float from one access point to another for a short trip. Most agriculture people don't have an opportunity to take a lot of time in the summer and enjoy the river experience in this way.
2320	2047	Current roads in the Monument are essential to access for recreational opportunities, emergency services, maintenance of existing water developments and future water, maintaining gas wells and access to the Monument in general. With projected numbers of tourists it would not be a good thing to concentrate them in limited areas. Local people use many of these roads to the river for weekend recreation and family get-togethers. Many times these roads are the only way for some to experience the Monument.
2320	2048	There is a strong agenda promoted by the environmental groups to close roads. I believe this would be a mistake. These roads are not only used by allotment holders, but also by local people for recreation. They also provide a conduit for Lewis and Clark travelers to see a portion of the area, without adding to the growing problem of river traffic.
2320	2049	While still keeping landowners' private property rights intact, I also think we need to work on public access. There should be more and improved access to monument lands, other than just by boat. I would hate to see the monument become a locked-up paradise for the outfitters and the wealthy.
2320	2437	To visit such an area is truly rewarding. To be able to do it without the intrusion of large numbers of motorized vehicles is even more important. Please protect and strengthen the monument.
2320	2911	I am concerned that there may be additional intrusions of roads and motorized vehicles into this wild landscape.
2320	2923	While road maintenance is necessary for agency employees and park visitors, I encourage your RMP to include and encourage the use of non-motorized vehicles as well as clean-burning fuel transportation vehicles.
2320	3468	Road building is probably the most dangerous form of development in the park because it can degrade the landscape and environment. From my personal experience, our region of the Poconos instituted rigid controls on ORV use and property values soared. Most people want wilderness to be quiet.
2320	3830	Ensure that this incredible habitat is protected for human (non-motorized land use), animal and bird use. Ideally, it should be managed in a way that keeps it as close to the natural condition that Lewis and Clark encountered some 200 years ago. This should include no motorized use off of primary road ways as there are currently far too many existing roads. Please close the majority of these unnecessary thoroughfares.
2320	4020	I am particularly concerned about insufficient regulation of motorized vehicles in the monument purview.
2320	4244	I sincerely hope that you will closely manage, monitor, and enforce stringent guidelines on road use in the Monument.
2320	5693	How is the monument's wilderness protected from traffic and commercialism? Please expand on this in the management plan.
2320	5694	I am opposed to any plan that closes any roads and denies people access to their public lands.
2320	10001	Cross-country motorized travel should cease immediately in order to protect the resource throughout the planning process. A "closed unless designated open" policy should be implemented. Off-road vehicles must be limited to roads designated for their use following comprehensive environmental review and public comment.
2320	10001	Designate a transportation system with a primary goal of protecting the resources. Roads should be maintained only to the extent that they access key visitor destinations within the monument. Unnecessary or ecologically harmful roads, trails and routes should be closed and those damaged areas should be restored or reclaimed.
2320	10002	Develop a management plan that restricts off-road vehicle use from ecologically and culturally sensitive areas.
2320	10002	Develop a management plan that prohibits construction of new roads.
2320	10003	Emphasize nonmotorized travel within the monument. Adopt a travel plan that prohibits cross-country travel and limits dirt bikes, all-terrain vehicles, and other motorized vehicles to existing, improved roads. Adopt a "closed unless designated open" policy for motorized travel.
2320	10005	Restrict ATV use from ecologically and culturally sensitive areas.
2320	10005	Prohibit new road construction.

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2320	10006	Keep motorized use within the monument minimal, but work to ensure that public access to the boundaries of the monument is adequate and reasonable.
2320	10006	In the uplands of the monument, limit motor vehicle traffic to authorized, maintained roads. Close roads and user-created routes that diminish the natural values of the monument.
2320	10007	The Monument's transportation system should be based on scientific review and focus on protection of natural and historic values. Roads and ways should be closed, unless designated open.
2320	10008	Revise the interim monument plan and allow roadside camping within 300 feet of an established road and permit off road travel during hunting season to retrieve big game.
2320	10008	Keep traditional access routes, roads and trails open in the monument.
2320	10009	Provide for a Monument transportation system that determines road retention and closures based on science and the protection of natural and historic resources. There are too many roads in the Monument today and too little management of motorized use. The RMP should include solid provisions for monitoring and enforcement.
2320	10010	Provide for a Monument transportation system that relies on science to determine road retention and closure and the protection of natural and historic resources. There are too many roads in the Monument today and too little management of motorized use. The RMP should include solid provisions for monitoring and enforcement.
2321	156	I believe that travel plans should be developed for the waterway as well as with roads and trails into the area.
2321	167	Carefully manage road usage in the uplands.
2321	1815	Public access to the boundaries of the monument should be adequate and reasonable.
2321	1854	Do not develop any new Missouri River Corridor or Breaks National Monument access locations. Keep at, or preferably below, those existing on date of Proclamation. Restrict all access to the Breaks National Monument boundary only--no internal developments.
2322	13	Restrict off road use in ecologically sensitive areas along the Missouri River.
2322	67	Additional access is needed to the river, as all current accesses are only on the north side of the river.
2322	112	We need access to the river at all times guaranteed.
2322	124	There should be no new construction of roads down to the river.
2322	165	We went down to see the white cliffs through private land. However, they did not want the large group (30-40 people) going down through their land. We would like to have a route down there where we can drive down to them--not hike--easy access. Any way but on the water.
2322	169	Please exclude the use of motorized travel off road and on the waterway.
2322	1695	Access points to the river should be kept at the current level (those existing prior to monument designation) with no new in-put or take-out points being developed. No new motor vehicle access points to the river riparian corridor should be developed.
2322	1720	No motorized traffic near enough to the river to be heard. In no way should motor vehicles be allowed to run through the monument or up and down the river corridor.
2322	1732	The wild and scenic segment should remain primitive in character. ATVs and motorboats would destroy the quiet solitude that makes the area so appealing and valuable.
2322	1768	I would urge a plan that restricts ORV/motor bike usage to system roads; that prohibits any motorized use on the wild and scenic portion of the Missouri.
2322	1809	As recommended by the BLM Resource Advisory Council, river access should be confined to the primary launch sites utilized prior to 2000. This would be in keeping with the remote nature of the area.
2322	1860	Access to the river itself should only be allowed from the launch sites in use prior to 2000, and no further access sites should be developed. In addition, no developed campsites or motorized access should be allowed in the section of the river from Judith Landing to Kipp State Park.

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2322	1871	My main concern is that you address vehicular uses, both in the river and on adjacent lands. It's pretty much a figment of our imaginations as it is...just hike up the breaks in most areas and it's all wheat fields and roads.
2322	1993	Remove the lock on the gate at the campground to reopen the road to the Hole in the Wall.
2322	2012	Remove the lock on the gate at the campground at the Hole in the Wall Campground. Remove the "authorized personel only" sign since people who access the river by vehicle there are part of the "public", too. Replace the sign with one that has campground rules for everyone to follow. The road to the Hole in the Wall is a traditional recreational access, which was locked by BLM a couple years ago (I thought it was due to extreme fire danger that year) without notification of local users or public process. The closure was sneaked in with no notification of the road's users. Since this is how BLM "manages", is it any wonder landowners are concerned about the future? Remedy this wrong and remove the lock. Some members of this family (who have never done "resource damage", vandalism, started wildfires or spread noxious weeds) are no longer able to picnic, fish or recreate or see the Hole in the Wall up close because they aren't able to crawl though barb wire fences or walk more than a very short distance. After nearly a century of family recreation on this area of the river with just a two-track road as evidence of the visits, it seems that floaters are given priority and we are being punished. All users should not be punished for the actions of one or two.
3050	153	Fire suppression and prescription burning. In recent years the BLM's attitude has been changing to try and let fire play a more normal historical role where practical. This means that suppression strategies may not be as aggressive in parts of the Breaks as they have been in the past and that natural barriers will be used to control fires before heavy equipment or other means are used. BLM also sees prescription burning as a management tool to manipulate vegetation communities to meet habitat goals and to control hazardous fuel situations. Shrub and tree communities are valuable habitat for wildlife species and especially for mule deer and sage grouse. Mt F,W&P is concerned that some burning will be carried out to the detriment of wildlife, but also recognizes that fires are a natural part of the ecosystem. The bottom line is that there needs to be a balanced approach and honest communication for the projects.
3050	1996	Fire can be a useful management tool and is a natural part of many biological communities.
3050	2010	BLM should develop a comprehensive fire management program for the Upper Missouri River Breaks National Monument.
3050	2010	Fire management is a controversial issue that should be dealt with through the application of the best available science to protect the long-term public welfare and the health and integrity of the ecological landscape.
3051	1996	The overriding priority in reseeding after fires should be to use native plants. In order to determine which native plant species are most appropriate for reseeding the BLM should consider the structure and diversity of vegetation in the burned area, the presence of noxious weeds, and the likelihood of reseeding. Areas with high diversity and likelihood of reseeding should not be reseeded.
3051	2010	BLM should develop appropriate Emergency Fire Rehabilitation protocols that are consistent with the protection of Upper Missouri River Breaks National Monument objects, resources, and objectives.
3100	1996	A determination must be made on a fire-to-fire basis as to the cost-benefit ratio, and particular emphasis should be placed on preservation of threatened habitats such as big sagebrush and riparian areas, as well as other non-fire adapted habitats.
3100	2010	BLM should define the Appropriate Management Response to fires within the Upper Missouri River Breaks National Monument, taking into account protection of objects and resources.
3100	2032	Fire can be a useful management tool and is a natural part of many biological communities. Fire is inevitable and has a positive role in maintaining the health of grasslands and enhancing wildlife habitat and forage. Trying to completely eliminate fire from grassland ecosystems would be extremely costly and probably isn't possible. Most important, it would be detrimental to long-term range conditions.
3150	1999	There should be no "let-it-burn" wild fire policy to threaten private property.
3150	2010	BLM should identify the threats imposed by Hazardous Fuel situations.
3150	2032	Restoration of natural fire regimes should be implemented where possible without undue risk to structures, livestock, and private property. However, a determination must be made on a fire-to-fire basis as to the cost-benefit ratio, and particular emphasis should be placed on preservation of threatened habitats such as big sagebrush and riparian areas, as well as other non-fire adapted habitats.

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4050	1996	The entire Monument was designated to protect objects of outstanding biological, historical, and paleontological significance. Consequently if any additional ACEC's are proposed within the Monument then the entire area should be included.
4050	2001	Determine and promote suitable habitat for sensitive species such as sage grouse and protect those resources with ACEC protection.
4200	1767	What impact will the prescriptions and RMPs have on waterways that are protected or eligible for protection under the Wild and Scenic Rivers Act? What permitted activities will be visible from any such waterways? State wild and scenic rivers? What impact will permitted activities have on wild and scenic river corridors?
4200	2010	BLM address how management of the wild and scenic segments of the Missouri River within the boundaries of the National Monument will be managed to complement protection of the National Monument's resources.
4200	2010	Ensure that within the boundaries of the wild and scenic river segments BLM proactively protect and enhance the outstandingly remarkable values of the river (16 U.S.C. § 1281(a)).
4250	149	There are supposedly several Wilderness Study Areas involved in portions of the Monument. I am in favor of wilderness classification for these areas within and contiguous to the Monument. There are few if any such: breaks topography/river system, prairie/badlands, low-elevation ecosystems represented in the wilderness system.
4250	153	There are three Wilderness Study Areas (WSA) (Cow Creek, Ervin Ridge, Stafford) in South Blaine County that BLM oversees. Congress has to designate wilderness areas, but until Congress specifically acts to create a wilderness, or release an area from consideration, BLM is expected to enforce measures to insure the eligibility for wilderness designation is not jeopardized. Signing in the area is not up to date and maps are being updated to help clarify the limitations and requirements. BLM occasionally receives calls from permittees or other sources complaining about what is happening in the WSA.
4250	156	I hope that at least some of these lands be designated as Wilderness Study Areas.
4250	1695	The existing rules for Wilderness Study Areas within the Monument should be strictly enforced.
4250	1713	Take particular care not only of the BLM Wilderness Study Areas within the monument, but also of the wild lands separating them. Manage the latter to the maximum extent possible as de facto wilderness, making possible a blocking up of eligible future wilderness.
4250	1717	All WSAs within the monument should be managed as wilderness, e.g. no temporary non-conforming uses like drill pads, new roads, or major range developments that aren't already in approved plans.
4250	1793	I would encourage the bureau to establish guidelines restricting all motorized use in the wilderness.
4250	1795	Please protect areas of public land within the monument that are being studied as Wilderness Study Areas. These must be zealously protected from degradation.
4250	1796	Prevent the degradation of the six Wilderness Study Areas, their potential is so valuable.
4250	1829	All Wilderness Study Areas must be protected.
4250	1830	Wilderness Study Areas should have full protection until designation or release by Congress.
4250	1860	The six Wilderness Study Areas within the boundaries of the Monument and areas that connect them should be protected in order to maintain their Wilderness integrity in anticipation of future Wilderness designation. No roads should be allowed in these areas and any existing tracks should be restored to a natural state.
4250	1864	Protect the Wilderness Study Areas from impairment by fully implementing the no impairment standard.
4250	1867	The six WSAs within the monument should be re-evaluated for expanded wilderness protection; the potential for gas exploration in the Dog Creek, Woodhawk, Stafford and Ervin Ridge WSA's should not trump recommendations for Wilderness designation.
4250	1901	I would favor protecting the wildest of the areas in this region by managing them as wilderness areas to protect them from development until they could be formally designated as wilderness.
4250	1905	Strong protection of Wilderness Study Areas is needed.
4250	1915	Secure protection for the Wilderness Study Areas and other wildlands and core areas and plan to inventory all roadless areas and set aside more Wilderness Study Areas.

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4250	1920	All wilderness lands should be preserved to the greatest extent possible.
4250	1952	Ensure protection of the Monument's wildlands and core areas, including the six Wilderness Study Areas, the Bushwhacker Coulee and others.
4250	1974	Wilderness Study Areas that exist now should be completely protected and there should be an intention to add areas of land that qualify as "wilderness."
4250	1975	Protect all existing roadless areas from development and propose them for wilderness designation.
4250	1982	Wilderness Study Areas should remain under protection of the Wilderness Act.
4250	2032	The BLM should also identify possible expansions to the six Wilderness Study Areas within the monument and manage these lands in a manner that protects their natural values.
4250	10009	Ensure protection of the Monument's wildlands and core areas. These include the six Wilderness Study Areas, the Bushwhacker Coulee and others.
4250	10010	Protect the Monument's Wilderness Study Areas and other wildlands and core areas.
4300	124	Adjacent roadless lands need to be protected to continue the quality of this experience as well as the quality of wildlife habitat.
4300	155	It is a treasure with areas that need to be designated as Wilderness Study Areas.
4300	179	Wilderness Study Areas must be managed as wilderness. Other roadless areas should be inventoried and managed as wilderness also.
4300	1681	Do not inventory the area for and manage as wilderness. We are strongly opposed to this. Such a designation will surely set up restrictions far in excess of ones established as a monument, thus eliminating some land uses and recreational uses by preventing major access into the area by many visitors. Why establish an area and then prevent the public from visiting it? There have been far too many restrictions of public access use on national public lands in the past few years already.
4300	1707	The six WSAs, as well as other roadless areas within the monument should be identified and studied. Those areas with wilderness potential must be safeguarded from development until Congress classifies them as wilderness areas.
4300	1708	The Bullwhacker area seems to be a sensitive spot. Surely all landowners can get together to solve this problem.
4300	1726	Areas that can be managed for future wilderness designation should be identified and protected.
4300	1739	Those areas in the Monument that are essentially undeveloped and wild should be retained in such condition for Congress to establish as wilderness.
4300	1746	Examples of areas that can be considered wilderness include the Wild and Scenic part of the river and the Bullwhacker region.
4300	1751	Lands outside as well as inside the monument that may qualify for wilderness protection should be inventoried.
4300	1759	The Missouri Breaks regions need to be protected and preserved as wilderness.
4300	1761	Protect the core areas of public land in the six wilderness study lands which includes the rugged expanse of the Bullwhacker study area.

4300 1767

Because of the increasing scarcity of roadless land in the Great Plains, and the ever-increasing awareness of the importance that these areas have for the conservation of biological diversity, any impacts that would degrade the wilderness characteristics of a roadless area are unwise.

"Roadless areas provide a sanctuary to animal and plant species most sensitive to human disturbances. These animal and plant species may not be able to adapt to new habitat created by fragmentation. Further timber sale activities may significantly impact recreational opportunities in these unroaded areas. . . It is undisputed that once a roadless area is developed through logging and road construction, it is irrevocably and irreversibly changed" [National Audubon Society v. U.S. Forest Service, 21 E.L.R. 20828, 20830 (D. Ore. 1990)].

"The decision to develop a previously undeveloped area is an irreversible and irretrievable decision, the impacts of which must be analyzed in an EIS" [National Audubon Society v. U.S. Forest Service, 21 E.L.R. 20828, 20830 (D. Ore. 1990)].

A bioregional and ecosystem approach to wilderness protection reflecting the best science available—conservation biology—shows that further degradation of roadless areas is scientifically, ethically, biologically, and socially unacceptable.

The BLM should recognize and consider the unique ecological values associated with designated and de facto roadless areas and wilderness study areas within what is otherwise a heavily roaded and fragmented private and public lands landscape. Scientists both inside and outside of the federal government have come to recognize that such undisturbed areas provide critical habitat for the maintenance of biological diversity and population viability in the Inland Northwest. See, e.g., Eastside Forests Scientific Society Panel. 1993. Interim Protection for Late-Successional Forest, Fisheries, and Watershed; National Forests East of the Cascade Crest, Oregon and Washington; A report to the United States Congress and the President ("existing roadless regions have enormous ecological value" and further logging in them should be halted); Wilcove, D.S., C.H. McLellan and A.P. Dobson. 1985. Habitat Fragmentation in the Temperate Zone. In: M.E. Soule, ed. Conservation Biology: The Science of Scarcity and Diversity. Sinauer Associates, Sunderland, Mass.; Noss, R.F. 1987. Protecting Natural Areas in Fragmented Landscapes. Natural Areas Journal 7(1): 2-13; Saunders, D.A., R.J. Hobbs and C.R. Margules. 1991. Biological Consequences of Ecosystem Fragmentation: A Review. Conservation Biology 5(1): 18-32; Harris, L.D. and G. Silva-Lopez. 1992. Forest Fragmentation and the Conservation of Biological Diversity. In: P.L. Fiedler and S.K. Jain, eds. Conservation Biology: The Theory and Practice of Nature Conservation, Preservation, and Management. Chapman and Hall Publishers, New York, NY. pp. 197-238.

The establishment of a regional network of interconnected reserves and appropriate linkages is considered, by many scientists, to be critical to managing for genetic, species, and landscape diversity on our public lands. See, e.g., Noss, R.F. 1983. A Regional Landscape Approach to Maintain Diversity. Bioscience 33(11): 700-706; Hudson, E.E. 1991. Landscape Linkages and Biodiversity. Island Press, Covelo, Cal., 195pp. You should consider the unique functions of roadless areas as refugia for solitude-dependent wildlife and at-risk fisheries, reservoirs of undisturbed genetic material, connecting corridors within an increasingly fragmented landscape and natural "control" areas for experimental "management" and scientific research.

Cumulative effects to roadless and remote habitat must be examined over an appropriate analysis area. See e.g., City of Tenakee Springs v. Clough, 915 F. 2d 1308, 1312-1313 (9th Cir. 1990) (finding a federal agency's cumulative impact analysis inadequate under NEPA and citing LaFlamme v. Federal Energy Regulatory Commission, 852 F.2d 389 (9th Cir. 1988) for the proposition that remand to the agency for further consideration of cumulative impacts is appropriate where the agency examined single projects in isolation without considering net impacts of all past, present and future projects in the area); Save the Yaak Committee v. Block, 840 F. 2d 714, 721 (9th Cir. 1988); 40 CFR fl 1508.27(a) ("the significance of an action must be analyzed in several contexts"). These cumulative impacts include not only present and foreseeable future effects, but also the accumulated, incremental effects of past human activity, including prior degradation or destruction of undisturbed habitat. See 40 CFR fl 1508.7.

NEPA requires that the BLM consider the best available scientific and technical information in making its decisions. See, e.g., Warm Springs Dam Task Force v. Gribble, 621 F. 2d 1017, 1023 (9th Cir. 1980). The scientific literature on biological diversity makes it clear that logging project assessments should consider, among other things, size distribution and connectivity for various types of habitat patches, amount and distribution of important types of such patches (such as roadless areas) which have been reduced by prior human activity, disturbed and historic vegetative mosaic patterns across the forest, cumulative effects of past activity from a watershed or regional ecosystem level, and edge effects of further forest fragmentation. See, e.g., Noss, R.F. 1990. Indicators for Monitoring Biodiversity: A Hierarchical Approach. Conservation Biology 4(4): 355-364.

The best science states that a major focus of analyses such as this should be to find ways to connect and buffer roadless areas with other undeveloped land to assure species viability and ecosystem functioning is perpetuated. In short, take a "hard look" at the cumulative impacts of allowing logging and road building in unroaded areas and in roaded areas providing corridors or linkages between core roadless areas. See Kleppe v. Sierra Club, 427 U.S.

390, 410 n.21 (1976); Save the Yaak, supra, 840 F. 2d at 718-719. State-of-the-art conservation biology and the principles that underlie the agency's own new policy of "ecosystem management" dictate an increasing focus on the landscape-scale concept and design of large biological reserves accompanied by buffer zones and habitat connectors as the most effective (and perhaps only) way to preserve wildlife diversity and viability. See, e.g., Noss, R.F. 1993. The Wildlands Project Land Conservation Strategy. Wild Earth Journal, Special Issue: 10-26; Noss, R.F. 1992. Conserving Oregon's Coast Range Biodiversity; A Conservation and Restoration Plan. Coast Range Association, Newport, OR. pp. 40; Baker, W.L. 1992. The Landscape Ecology of Large Disturbances in the Design and Management of Nature Reserves. Landscape Ecology 7(3): 181-194; Graham, R.W. 1988. The Role of Climatic Change in Design of Biological Reserves: The Paleoecological Perspective from Conservation Biology. Conservation Biology 2(4): 391-394.

We urge the BLM to fully protect the inventoried/designated and uninventoried/undesigned roadless and wilderness study area resources and other associated resources and values of Monument and surrounding BLM land. The BLM should appropriately protect the above-ground resources, hydrological resources (including waterways, seeps, springs, watertables, and aquifers), and any cave or sensitive geological resources that may exist in the area. Indicator species, TES, big game, and other BLM-recognized species dependent on the resources of such areas should be adequately protected from adverse effects. Cultural resources, viewsheds, and non-motorized recreational values of the area should be adequately protected from adverse effects as well. In fact, we request that the BLM identify all roadless areas and wilderness study areas as specific areas that are particularly sensitive to extractive mineral development. The BLM should not allow any surface mineral operations, roads, and motorized use to be permitted in these area at all.

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| 4300 | 1768 | The remaining wild lands in the Breaks should be managed as de facto wilderness. At a minimum this would include the WSAs and the Bullwhacker. |
| 4300 | 1784 | All public lands in the white cliffs area that have wilderness potential on the Missouri in that area should be administered to protect this value. |
| 4300 | 1806 | This monument is thousands of times more valuable just as it is than it ever would be with "development." There is a lot of wilderness potential there that also should be protected. |
| 4300 | 1817 | Bullwhacker deserves status as WSA. |
| 4300 | 1840 | The areas within MBNM which have potential as "National Wilderness" need vigorous protection, particularly the core area known as the "Bullwhacker." |
| 4300 | 1849 | I want the BLM to identify and catalog the monument lands that have wilderness potential, and then administer these areas to protect their wild character and values. |
| 4300 | 1857 | The Bullwhacker area is a special place. Please manage it to protect wilderness values. |
| 4300 | 1860 | Identification and cataloging of all public lands with wilderness potential should be a management priority. These areas should be administered to protect their wilderness values, especially the Bullwhacker area which is considered the heart of the Breaks. |
| 4300 | 1863 | Roadless areas with wilderness potential should be inventoried and managed to protect their wilderness character. |
| 4300 | 1864 | Reinventory the Monument for additional wilderness quality land. |
| 4300 | 1867 | Other areas such as the Bullwhacker should be inventoried for wilderness qualities with the intent of providing recommendations for inclusion into the Federal Wilderness Preservation System. |
| 4300 | 1879 | I urge that all areas that qualify or may qualify for Wilderness designation be managed to protect their wilderness character and that the area should be inventoried to determine if additional areas merit consideration for wilderness and interim management. |
| 4300 | 1881 | Any areas that could be placed in wilderness designation should be managed as such until the process can be completed and a decision made as to wilderness or not. |
| 4300 | 1882 | We hiked in Bullwhacker canyon which should be maintained/restored as a wilderness area. |
| 4300 | 1885 | Identify, catalog, and protectively administer all roadless and primitive lands as wilderness, or its equivalent. |
| 4300 | 1918 | The RMP should establish a timeline for taking an inventory of additional lands that may qualify as wilderness. |
| 4300 | 1921 | I would hope adding additional appropriate land in the near future as wilderness would be a priority as well. |

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4300	1924	Develop a program and timeline for inventorying additional lands that may qualify as wilderness.
4300	1933	As an ecologist I strongly urge you to protect the Monument's Wilderness Study Areas and other wildlands and core areas and set out a program and timeline for inventorying additional lands that may qualify as wilderness.
4300	1939	Ensure protection of the monument's wildlands and core areas. These include the six Wilderness Study Areas, the Bushwhacker Coulee and others.
4300	1940	The Wilderness Study Areas should be completely protected and there should be an investigation into adding land as wilderness, not reducing it.
4300	1952	Set a specific time for completing an inventory of additional lands that may qualify as wilderness.
4300	1961	Potential wilderness lands should be administered to protect the wilderness values, especially the Bullwhacker area.
4300	1966	No additional lands should be inventoried as wilderness.
4300	1978	Address additional designations of Wilderness Study Areas in the planning process. Review information submitted by the public in determining potential wilderness areas in the Monument.
4300	1985	The RMP must protect the Monument's Wilderness Study Areas and other wildlands and core areas and must set out a program and timeline for inventorying additional lands that may qualify as wilderness.
4300	1992	In the interests of maintaining it "the way it is," the BLM must study and catalog all areas with wilderness potential. Once identified and studied these areas should be managed as de facto wilderness until formally protected as wilderness by Congress.
4300	1996	Protect the Monument's Wildlands and Core Areas, Especially the Bullwhacker.
4300	1996	The BLM must identify additional wildlands that qualify for protection as wilderness study areas [FLPMA 43 U.S.C. Sec. 1711(a)] The BLM must manage these vital lands in a manner that protects their natural values (BLM's Interim Management Policy for Lands Under Wilderness Review H-8550-1).
4300	1997	Remember, public lands are already protected by the following laws; Clean Air Act, Clean Water Act, Resource Recovery Act, Endangered Species Act, Fish and Wildlife Coordination Act, National Historic Preservation Act, Wild and Scenic Rivers Act, and the Archaeological Resources Protection Act, just to name a few.
4300	1997	I urge you to not lock away the lands within the Monument using extreme or restrictive definitions of "wilderness values". Certainly those areas within the Monument designation that are already in WSA's should be managed accordingly. But somehow there has been a concept foisted on the public, that vast tracts of land must be tied up with "wilderness character" to provide "outstanding opportunities for solitude or a primitive and unconfined type of recreation".
4300	2010	BLM should assess wilderness quality lands by using the BLM Wilderness Inventory Handbook to evaluate designation of Wilderness Study Areas.
4300	2010	BLM should review information presented by the public in determining potential wilderness areas in the Upper Missouri River Breaks National Monument.
4300	2010	BLM should address designation of additional Wilderness Study Areas in the planning process.
4300	2021	There are substantial areas of public land within the monument which have wilderness value and potential. These include six WSAs and the rugged expanse of the Bullwhacker, which is considered to be the heart of the Breaks and "some of the wildest country in the Great Plains." The BLM will re-inventory these areas for wilderness qualities. In addition, all WSAs within the monument should continue to be managed for non-impairment.
4300	2032	Reevaluate the wilderness potential of the Bullwhacker area. The area was dropped from consideration during the first evaluation process because "The 45 vehicle ways, 57 reservoirs, gas lines, and 44 live or dry gas wells give the area an unnatural appearance." Most of the vehicle ways -- two tracks -- were either unauthorized user created routes or developed for natural gas exploration and should have been decommissioned years ago. As required by the Wilderness Act, the area is substantially natural and the imprints of humans do not dominate.
4300	2044	I would ask that you inventory and register all the public lands within the area with wilderness character and manage them for their wilderness values, especially the Bullwhacker area.

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4300	10001	Assess the wilderness values of the monument and provide interim protection to wilderness quality lands by designating such lands as Wilderness Study Areas.
4300	10006	Identify and catalog all public lands with wilderness potential, then administer them to protect their wilderness values, especially the Bullwhacker area.
4300	10007	Protect the Monument's wildlands and core areas and inventory additional lands that may qualify for wilderness protection.
4300	10009	Set a timeline for inventorying additional lands that may qualify as wilderness.
4300	10010	Set out a program and timeline for inventorying additional lands that may qualify as wilderness.
5050	164	This is a wonderful opportunity for the BLM and the people of central Montana. If properly managed, the Missouri River Breaks can provide tourism, hunting, and other forms of recreation for generations to come while bolstering the economy of the State of Montana.
5050	2035	With agriculture being Montana's number one industry, decisions affecting agriculture have a far-reaching impact that needs to be considered closely as an RMP and EIS are developed for this monument.
5051	2	Free the entire place from the burden of any human economic interest.
5051	61	There should be no commercial or residential development in this area.
5051	79	What I would like to see in the future is that there won't be any commercial use in the breaks and that means no hotels, motels, no motorized vehicles (including boats on the river).
5051	89	Development should be discouraged because once an area is developed, they tend to lay claim to all surrounding public lands and waters.
5051	119	I am not in favor of any commercial advertising in the Monument area.
5051	122	Don't allow any commercial activity and development that will degrade the nature of the area for those seeking to have a quality nonmotorized experience.
5051	134	New construction kept to a minimum.
5051	1834	It is clear that the highest economic use of this resource is for it to be maintained/restored to its natural state and preserved for future generations. The agricultural and mining value of this resource is nil.
5051	1852	Don't commercialize the land that you control--there's plenty of private land that you don't control, and those things can go there.
5051	1860	Development within the Monument itself should be limited. Visitor centers, interpretive facilities, other service providing facilities should all be kept to a minimum. These types of development would be most appropriate in the communities that serve as gateways to the monument, and would be positive additions to their local economic mixes.
5051	1874	Commercial development along the river must be prohibited or rigorously controlled.
5051	1875	Maintain the wild character of the breaks by not allowing commercial development.
5051	1908	We think that private enterprises should not be allowed to be in wilderness areas.
5051	1919	Please be sure that profit motives do not outweigh the preservation and restoration of the Upper Breaks National Monument.
5051	1946	Do not accept commercial/recreation development.
5051	1996	Minimize recreational development (visitor centers, services, interpretive facilities, etc.) in the Monument, with an emphasis on recreational development in gateway communities.
5051	2010	Visitor developments should be limited to the adjacent communities to protect resources and benefit local communities.
5051	2010	BLM should not allow concessions in the National Monument.

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5051	2010	BLM should make use of existing infrastructure rather than developing new facilities.
5052	115	How should the communities within the monument prosper? BLM #1 should do its business within those communities, not only Lewistown or Billings.
5052	1706	Local communities could prosper by sight seeing on a closely regulated basis. Economic opportunities can grow from preservation of the area.
5052	1845	The local communities will need economic and material assistance for fire suppression and other emergency services needed from the impact of more tourists in the area.
5052	1996	The Monument designation will provide unique economic opportunities and diversification for gateway communities. Careful planning that focuses on keeping all infrastructure outside the Monument will benefit the economies of the local communities tremendously, while at the same time retaining the wild, remote character of the Monument and preserving its resources. In addition, by having only primitive campsites with minimal facilities in the Monument, there is no competition with local economic opportunities. The exact location of such infrastructure in the communities should be based on considerations of market feasibility, economic factors, infrastructure availability, financing availability, and managerial concerns. The BLM should work with the local communities in making these determinations.
5052	2010	Locating visitor services in surrounding communities builds ownership within those communities for the long-term protection of the Breaks and creates economic opportunities for citizens. It will also demonstrate to visitors the relationship of the Breaks landscape to communities, so that they do not view the National Monument as an enclosed land mass separate from the people who live nearby.
5052	2012	Minimize expense and hardship on local residents and landowners.
5052	2012	How would you have local communities prosper? Agricultural prices that keep up with rising expenses and a cost of living raise, instead of staying at 1950's levels, would certainly help—and save the cost of subsidies. Could you live on what your job paid in the early 1950's? Tourism is seasonal, will not support enough people, and provides mostly low-paying jobs, so communities need more, including healthy agriculture that will support young people returning to farm. When ag prices were fair, the local communities supported a large variety of businesses—just look at old pictures or talk to old timers. Oil and gas will be needed until alternatives can get established, and should not be ruled out in the Monument. We don't need more people working for government, being paid with tax dollars. Environmentalist groups seem to have unlimited money, maybe they are hiring more lobbyists?
5052	2035	As the process to develop a RMP continues, increased tourism and corresponding requirements to support this increased traffic should be incorporated. The Montana Stockgrowers Association feels programs like Undaunted Stewardship, which encourages land stewardship, educational outreach and increased economic value to ranching communities, should continue to be promoted. This particular program provides the ability to meet many of the state's increasing tourism needs, while at the same time providing economic viability on many ranches. It is possible that new ideas and programs will be met with apprehension; however, the BLM should demonstrate its commitment to entertaining fresh ideas.
5052	2048	As you know, the monument designation has been (and remains) a very unpopular idea in most of the rural communities directly affected by it. Most of us, however, are reconciled to the fact that it is here to stay. I believe that local acceptance of the monument designation could become a reality if it is demonstrated that the BLM is cognizant of local economic realities and concerns.
5053	116	I would suggest that you add "private owners rights" to your list of peer concerns.
5053	1978	Recognize the Monument proclamation's provision for continuation of exiting land ownership and uses.
5053	1998	There must be no limitation or regulations on what can be done with the private property that has been taken in by the proposed boundary.
5053	1999	Freedom to sell property or to pass it to heirs must be protected.
5053	1999	No type of wilderness area should be considered anywhere in the Monument because of the effect on private property. This private property is used in the production of food for our nation and should be protected for that reason.
5053	2001	Recognize the proclamation's provision for continuation of existing land ownership and use.
5053	2026	Without the BLM lease use, the ranch will be unable to generate income to allow payment of current loans and obligations. This negative effect on cash flow could possible force a distressed sale of our family ranch after more than 100 years.

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5053	2035	Currently there are over 300,000 head of cattle and 2,684 farms and ranches in the counties that lie adjacent to the monument boundary. This equates to approximately 12 percent of the cattle and 10 percent of the farms and ranches in Montana. These numbers add up to a significant portion of the income to the county that is collected through taxes and dollars spent supporting local businesses. Because of the important role that agriculture plays in these rural communities, decisions that will affect these livestock producers and landowners must be taken into account.
5053	10008	Ensure that those economic activities that are dependent on the land and its natural resources are safeguarded and embraced in the RMP.
5054	174	Visitor centers and facilities should be in local cities.
5054	1809	Recreational development such as visitor centers and interpretive facilities should be placed in gateway communities not in the Monument. This will protect the Monument resources while supporting and diversifying the local economies.
5054	1863	Recreational development and visitor facilities should be confined to developed areas, preferably in nearby communities which can benefit economically from the location of these services, thus leaving the Monument itself in its primitive condition.
5054	1864	Off-site public facilities in the gateway communities of Big Sandy, Fort Benton and Lewistown should be encouraged. Limit public interpretive sites within the Monument to easily accessible areas on already existing roads.
5054	1978	Institute an on ground presence of BLM personnel, including rangers, specifically on weekends beginning in May and extending through October when the visitation is the greatest.
5054	1988	The BLM personnel in Fort Benton and Judith Landing were friendly, nice people but they didn't seem to have very much firsthand knowledge about the river, the campsites, nor an accurate idea of the weather. It wasn't unendurable, but someone less prepared than us for the unexpected could have been in big trouble. Even looking at a map, one BLM person could not tell us what amenities were at what campsites, nor could they compute the distance from place to place.
5054	1996	Commercial vending activities should be situated in gateway communities and should be prohibited on Monument lands. Allowing vending within the Monument would unnecessarily commercialize the area, thereby degrading its wild, undeveloped character.
5054	1996	The Monument should protect the wild character of the area by minimizing infrastructure within the boundaries. Any other policy will destroy the character of the Monument and degrade its resources. Infrastructure in the UMRBNM should be restricted to the aforementioned campground facilities, the rest being located in the gateway communities. Signing, where appropriate, should follow VRM requirements.
5054	2010	BLM should describe in detail the type of structures that will be allowed and the type that will not be allowed within the boundaries and within various parts of the National Monument. These structures should be limited to minor visitor facilities (signs, fences, etc.) necessary for safety or resource protection. Again, as a general proposition, all visitor facilities, where possible, should be located in nearby local communities.
5054	2010	BLM should not allow lodges or developed campgrounds to be built in the National Monument. These facilities should be privately owned in the local community.
5054	2021	Vendor activities should be in the gateway communities rather than in the Monument.
5054	2021	Recreational development (visitor centers, services, interpretive facilities, etc.) should be minimal in the monument, with an emphasis on recreational development in gateway communities.
5054	2032	As recommended by the RAC, recreational development (visitor centers, services, interpretive facilities, etc.) should be developed in gateway communities -- not in the monument. Gateway communities should serve as the focal points for recreational development, thereby protecting the monument resources while supporting and diversifying the local economies.

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5055	1767	<p>How much has the BLM taken in annually for allotments in the Monument? How much is spent by the BLM in administering the allotments, on-the-ground and administratively?</p> <p>The analysis should contain all costs and adequately discuss all current, in place benefits—the costs of past and proposed specific improvements should be fully disclosed. The analysis should include ongoing and future impacts to recreation, and all costs related to grazing activities including costs of preparing the analysis, all specialist support and consultation, costs associated with travel management and administration, road maintenance, weed control, costs of doing fencing, water, and other related improvements.</p> <p>The BLM should follow thorough and tell the full economic story of just what the impacts would be to all taxpayers, not just to the permittees.</p> <p>We request an economic analysis that compares the expense of restoring these damaged areas, on a continuing basis, with a no-grazing scenario.</p>
5055	1767	<p>We request that you prepare an economic analysis of any extractive development and ground disturbing activities (including mineral development, grazing, logging, roadbuilding, etc) and disclose to what degree the activities studied in the RMP are below-cost. We request that you document how your decisions and the selected alternatives maximize net public benefit. In other words, you should give consideration to, and adequately document, who benefits by these projects and who “pays” for them. We also are concerned that the cost of government subsidies could make some of these activities economically unfeasible. We ask that all costs and benefits be itemized in the analysis, so the public can see these figures.</p> <p>Net public benefit is determined by numerous inputs and outputs, some of which are quantifiable and others which are more qualitative. Economic analysis can provide a useful basis for evaluation only if the economic evaluation is comprehensive and documents all costs and benefits related to the proposed action. We would like the analysis to:</p> <ol style="list-style-type: none"> (1) Insure that the economic analyses are meaningful, by including in the analyses both direct and induced costs; (2) Adequately assess all current, in-place benefits; (3) Include impacts to hunting experience, fishing experience, hiking, water recreation and other forms of recreation (how will the proposed project impact the quality of backcountry hiking, for example?); (4) Quantify all induced losses to outfitters and guides who may currently derive economic benefits from the areas; (5) Consider all costs related to the projects, including the costs of preparing the analyses, all specialist support and consultation, costs associated with travel management and administration, road construction and engineering expenses, weed control, reforestation and planting, stand exams, timber stand improvement, and all other costs.
5151	67	<p>There is a great need for emergency services on the river and it appears that because of the lack of BLM presence, these services are not being provided for by those in charge of managing the area.</p>
5151	68	<p>Emergency services actually on the river. Without a lot of BLM presence, the lack of and timing of responders could present problems the BLM is not equipped to handle. It's my understanding that the access roads/areas to the river are mainly on the north side of the river, and this could be of concern in emergencies.</p>
5151	92	<p>The management plan should consider the impact of the monument on local emergency resources and provide financial and other support to these local agencies.</p>
5151	1843	<p>Emergency access is also adequate as in most cases dire emergencies are responded to by helicopters.</p>
5151	1862	<p>Increased tourism will impact local communities and consideration should be made to provide help to fight fires or other emergency services.</p>
5151	1972	<p>BLM should take a large role in fire suppression, search and rescue and emergency services.</p>
5151	1998	<p>There is a need to develop guidelines and support for emergency services. This is a very large area and fire could be very dangerous if not properly controlled. EMT service is limited and can't be everywhere or as soon as some people might think.</p>
5151	1999	<p>Local communities giving emergency services and fire suppression should be reimbursed.</p>
5151	2012	<p>Reimburse counties for emergency services, county road maintenance and other expenses from all the additional tourism that the Monument will create.</p>

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5151	2038	There must be concrete coordination between local communities and the BLM that addresses fire, rescue and ambulance services. Presently, there is poor, if any means, for communication between these agencies during operations and no mechanism for financial support or reimbursement for these volunteer services. The first emergency calls for assistance in the river area go to 911 which is immediately passed to the nearest community with emergency capability. While no one is suggesting that emergency services be denied to persons in need, this service can no longer be a free ride and at some point could overwhelm local capabilities. Without some formal communication arrangements between the BLM and local emergency services, a disaster looms on the horizon. I strongly urge the BLM to host a forum with local emergency services in the river area and work out some protocols and procedures that address these important issues. At the very least, opening some form of dialogue will help temper the ongoing rancor over this issue.
5151	2048	Many in our local communities are concerned about the fate of our local volunteer (fire, ambulance) services, and how we will maintain these. I don't have an easy solution to this problem, but I believe it could be addressed by monument management in a pro-active way. Meet with the people involved in these services, find common ground, and come up with some ideas.
5151	10008	Provide economic or material assistance to local communities for fire suppression, search and rescue and other emergency services that will be impacted by increased tourism in the Breaks.
5152	68	Bathroom/restroom maintenance could be improved.
5152	92	All users of the river corridor should be required to carry out all human waste.
5152	105	The only thing I would like to see is more outhouses at main camping places--Eagle Creek, Hole in Wall, Arrow Creek, etc. There were quite a few people at these camping places and the line-up for each outhouse was from 4-6 people all the time.
5152	1695	If public use of the river corridor reaches the point of harm to the resource because of sanitation and litter problems, the agency should have a contingency in its management plan to accommodate administrative motor access to certain camping points along the river. This is intended to allow for maintenance of sewage and solid waste removal facilities by BLM or a contractor. An alternate policy would be to limit public use of the river to a level that produces no harm to the resource because of sewage and solid waste.
5152	1776	Upper management of the BLM needs to spend more time on the river, especially in areas of heavy camping and tourist travel. This needs to be done semi-immediately because of the particular fluctuation in floater use. The dumpsters at Judith landing have been overflowing several times already this summer and it is not my responsibility to clean up garbage in my hayfield that these tourists are leaving behind. Having dumpsters on the river is a wonderful idea, but they need to be managed very closely. Consider the fact that we are not even in the midst of the L&C Bicentennial. This is just one impact that is already having an effect on the immediate area. What does the future hold? Written comments are good, but the people involved in forming the RMP need to spend some time with the locals and discuss this.
5152	1839	The composting toilets at Dark Butte seemed to us to be a failure. It could be that they were overloaded but they were far from satisfactory. Perhaps a power ventilating system run from solar cells could improve the efficiency of such toilets. We realize, of course, the problems of trying to access "pump out" toilets for use in that area.
5152	1843	To preclude sanitation problems it was decided to require all users to carry a port-a-potty. There is also the possibility of adding more composting toilets to the class three sites (fire ring only) and this should be done. This system has proven effective and should be expanded. Should over usage of the Class 2 sites occur and they need a "healing time" it would be good sense to have the Class 3 sites to fall back on and not create an unpleasant situation for many users.
5152	1854	Missouri River Corridor sanitation is grossly inadequate because BLM has not in past decades properly, rationally managed and enforced river traffic and uses.
5152	1875	In heavily used camping areas, human sanitation should be addressed i.e. outhouses.
5152	1986	If more accessibility, development, advertisement and commercialization are allowed and encouraged it will eventually become a littered and ravaged landscape with paper cups and bottles floating down the river and stuck in the mud.
5152	1998	There should be no limit on river travel floaters or campers. That will require development of campgrounds and toilets along the river. They are a must or there will be a human waste problem. I don't want to see a portable-potty system installed. That would cause a policing problem. There are a lot of floating potties in California and that might be a solution here. We want it to be easy to keep our river clean and useable for everyone, not limited to a select group.

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5152	2001	Adequate sanitation facilities should be located and constructed in the least intrusive manner; it is assumed that facilities will be upgraded to match needs of the recreating public, but follow guidelines.
5152	4840	Provide recycle bins which are clearly marked for the convenience of visitors disposal of debris. Post gentle reminders that 'visitors' are just that. They have entered the home of the ones that 'live' within the monument and thusly, should be afforded respect.
5200	1	I believe that there also must be an attitudinal change in order to make things work. I think that it is true that we begin to recognize that there is more value to our lands than a monetary value we can extract.
5200	9	While I am very sympathetic to environmental concerns. I can grasp the sentiments of those who feel impacted by "outsiders"--governmental agencies and environmental groups, alike--who they see as intrusive and often threatening.
5200	140	Some of us see the beauty in old farm equipment or brand new Dodge Ram trucks. Others of us see beauty in undeveloped landscapes, whether the Beartooth Mountains or the Missouri Breaks. But beauty is not sensed only with the eyes. The smell of sagebrush, the sound of a river and its birds have their beauty too. So does the sound of silence.
5200	168	The current ranching culture is unique and should be preserved.
5200	1724	The Upper Missouri River Breaks is a place where my soul can heal from the noise, confusion and chaos of city life. Americans need natural places they may go to restore sanity and the Upper Missouri Breaks is one of those places.
5200	1741	While some delight in technology that can get them to lakes, rivers, hills and wilderness areas with high-powered motors, the "cost" of these machines negatively affects the users as well as future generations and the land.
5200	1770	The majority of Americans want the river corridor preserved for its scenic, quiet, bird and wildlife areas, and contemplative values. They don't want to have their silence and serenity shattered by the roar and stench of jet boats driven by "adrenaline junkies" or the wildlife values diminished by the noise and just pollution from ATVs and dirt bikes.
5200	1781	This state is rapidly succumbing to the many demands of the new "technocrats" moving in, so we must protect these precious pieces of wilderness and scenic splendor.
5200	1794	Don't be misled by bogus arguments about motors allowing access for the old and disabled, etc. I have taken people from three to seventy-nine years old in canoes--people who had never been in a canoe before. The Missouri is an easy river to float. It doesn't require great skill or strength.
5200	1795	We need to be able to commune with nature to maintain our sanity in this complicated, strife-ridden, mad life most of us face daily.
5200	1988	I don't know if you'll ever untangle the competing interests of ranchers and other landowners and recreational users but this is a decidedly unique piece of landscape and a very historically interesting part of the United States. It deserves thoughtful compromise from both.
5200	1992	The long-term goal of what is best for the land should always be kept in focus. Society's preferences and needs change, people come and go, but only the land can endure.
5200	2050	The aircraft and pilot community is a very active community and has gotten more active in the past few years. Frankly, we are no different than the snowmobilers, back country horsemen, or boating people, etc. We all share a common love of the outdoors and its environment, but we also enjoy the use of our airplanes, boats, snowmobiles, horses, etc. to enhance the enjoyment of these natural areas.
5200	10004	The general aviation community is a legitimate sector of the population which needs to be given appropriate consideration in the development of the RMP.
6000	17	We encourage BLM to adopt a watershed approach in their management of public lands within the MBNM.
6000	118	Keep the process of management open and involve local management. Don't be derailed by individuals who are seeking only a one-sided solution. This is a public process.
6000	119	To Secretary Gale Norton's management philosophy--"Consultation, Cooperation and Communication in the service of Conservation," I would like to add another "C" -- Compromise: Consultation, Cooperation, Communication and Compromise in service of Conservation.
6000	152	I believe in compromise. Hopefully all the sides can sit down at a table and work out agreements.

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6000	2012	BLM should review the comments and concerns previously sent in to the RAC or BLM about the Monument.
6050	2	Build no more infrastructure: no fences, toilets, wells, boat ramps. In fact, take as many as you can out.
6050	119	I would advocate restrictions on motorboats, rights of way, and a moratorium on gas and oil activities until more important issues are resolved.
6050	148	I feel the entire monument, including the river itself, should be managed so as to maximize the quality of a Lewis and Clark experience. Keep the area as natural as possible; allow users to dream/experience and taste what live was like in this last best place.
6050	150	Both the Antiquities Act and the President's proclamation demonstrate that research and public education were important reasons for establishing the monument. These activities should be considered in managing it as well.
6050	178	RAC Subgroup management integrity issues of concern: 1) management to protect values that led to/justified monument declaration (cultural, historic, remoteness, solitude, natural beauty-geologic); 2) management separation, priority; 3) visitor accommodation vs. protection of natural values; and 4) funding & staffing.
6050	185	Please keep included in the monument the private lands which are adjacent to the federal lands, while working with the landowners to insure the quality of the area as well as their continued agricultural operations.
6050	1686	We have seen the Missouri wild and scenic river when it was 90% as seen by Lewis and Clark. Now we see vandalism and over use by power boats.
6050	1708	The surrounding landowners will be compensated by federal funds, I'm sure.
6050	1726	Set aside special areas for no development.
6050	1742	The most important issue to us would be that it be managed for the serenity that it embodies.
6050	1751	Decisions could be made that will continue to allow degradation of the natural and historical values already evident on the ground. Your management policies for the next 20 years and beyond must establish a strong biological and historical emphasis--or what is a monument for?
6050	1803	Emphasize the natural experience for visitors & BLM managers.
6050	1842	Please keep the breaks quiet. No jet boats, no motors even, no overflight, no road and no development. This is a monument that people need to visit in a slow quiet manner to fully appreciate its timelessness...like stepping back from this hurried century and adopting the lazy ways of the river.
6050	1843	In all aspects of management it must be ever clear that the MBM be kept as close as possible to the condition that Lewis and Clark found it in 1805.
6050	1850	Emphasize a management plan that enhances the natural values of the monument. As an eastern MT native, I can't emphasize enough the need for quality wild lands (esp. public lands) in this part of our state.
6050	1852	It's important to keep the promises made in the proclamation that established the Monument. This may seem easy now, while it's fresh in our memory, but twenty years from now, if you can still trace your management to that mandate, it will do a lot for the credibility of the institution.
6050	1852	Ban boom boxes.
6050	1874	It should be the goal of the BLM to manage the monument in such a way as to allow the traveler the opportunity to relive the Lewis & Clark experience in an environment as closely as possible to the original one.
6050	1891	My biggest concern is that people have an opportunity to enjoy the natural wonders of the monument without destroying it at the same time. Unfortunately this means there have to be rules that everyone must live by, river runners, ranchers, hunters, hikers, and oil and gas people.
6050	1966	The plan should preserve the monument's character at the way it is today in the 21st century, not restore the monument's wild, undeveloped character back to the 18th century or some other date that the Wilderness Society wants. We don't live then, we live today. In doing so at today's level, the plan would also protect access for the public that they currently have and so all will be able to enjoy it.

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6050	1996	<p>Researchers must comply with decisions made in the RMP.</p> <p>All research should require special use permits.</p> <p>All research should meet data collection standards to be established by the monument manager and should provide information that feeds directly into the adaptive management framework.</p>
6050	1996	<p>Work with local, state, and federal scientists and agencies to facilitate appropriate scientific research and foster an ecosystem management approach that would benefit the protection and management of the Monument's objects.</p>
6050	1996	<p>It is imperative that the BLM establish collaborations with appropriate federal and state agencies and scientific institutions and organizations.</p> <p>The BLM should form an innovative partnership with Charles M. Russell National Wildlife Refuge to best manage wildlife species and their habitats that occur on a landscape scale. Such a partnership can contain agreements for the sharing of human or material resources, the management of specific tracts of lands for specific purposes, or the adjustment of management responsibilities on prescribed lands.</p> <p>The BLM should form a close collaboration with Montana Fish, Wildlife, and Parks, as well as appropriate scientific authorities, to manage and protect wildlife habitat in the Monument.</p> <p>The BLM should form a close collaboration with the USFWS and Bureau of Reclamation to address the restoration of natural flow variability in the Missouri River.</p> <p>The BLM should consider, where appropriate, contracting with private sector businesses, non-profit organizations, academic institutions, and government agencies to perform essential studies, monitoring, or project development.</p> <p>The BLM should increase the use of citizen and organizational volunteers to provide greater monitoring of resource conditions and to complete on-the-ground developments for resource protection.</p> <p>Non-profit organizations, citizens and user groups that have adequate resources and expertise could enter into cooperative agreements to assist Monument management. Assistance can include but is not limited to resource monitoring, site cleanups, and assistance with authorized projects.</p>
6050	1996	<p>Monument priorities and budgets should focus on a comprehensive understanding of the resources while assisting in the development of improved and innovative land management, restoration, and rehabilitation practices.</p> <p>The Monument's first scientific priority should be to collect data on resources that are most at risk of being lost, damaged, or degraded.</p>
6050	2010	<p>The National Monument should serve as an outdoor laboratory where current and future generations can study biological and earth sciences, prehistoric life and environments, human history, and the application of scientific knowledge to improving land management. BLM should support and encourage scientific study, consistent with the primary objective of protection and preservation of the cultural and natural resources within the National Monument.</p>
6050	2010	<p>BLM should maintain management authority for the Monument and should not consider untested management initiatives for the protection of the Monument's resources.</p>
6050	2013	<p>The Capital Trail Vehicle Association would appreciate your support of an alternative and decision for Monument that adequately considers the human environment as envisioned by NEPA, provides continued high standards of living and a wide sharing of life's amenities for all citizens, and that provides for multiple use, motorized access, and motorized recreation in the lands managed by the BLM.</p>
6050	2041	<p>Hopefully you will be able to limit facilities to those that are absolutely needed, that you can regain as much as possible of the pre-settlement environment of the land, be able to limit the use of power boats and set equitable limits on use to protect the value of the experience.</p>
6050	2596	<p>We ask basically that the monument be treated in an environmentally sustainable, reasonable, and practical manner.</p>
6050	2920	<p>Unfortunately, there are still too many people who think that if something hasn't been developed and sold it has somehow been "wasted."</p>
6050	3343	<p>I cannot believe that the Bureau of Land Management would want to spoil such a beautiful place as the Upper Missouri River Breaks National Monument.</p>

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6050	4173	we must manage our national monuments that only meets the objectives for which they were established. National Monuments, irrespective of what President Bush claims, are not tree farms. They are not oil fields. They are not playgrounds for ATV riders. They must and do have a different purpose.
6051	30	The utility of science as a management tool cannot be overemphasized when considering the conservation and future health of the Monument. Good science will contribute to sound decisions in management.
6051	172	Emphasize conservation of the natural integrity and historic character of the landscape.
6051	187	For it to be a long-term success, and to be protected for many decades, the management plan needs to place as highest priority, conservation principles. The plan should not allow development or other uses that defeat the protective purpose of the monument principle and its designation.
6051	196	Conservation principles that will not allow development or uses that defeat the protective purpose of the monument designation must be adopted.
6051	1682	The wild and historic values of the UMRBNM should be maintained and the UMRBNM should retain its current boundaries and that off-road vehicular traffic should be prohibited. Historic uses of the UMRBNM such as grazing, hunting, fishing and recreation should continue under BLM supervision. Montana is one of the few states left with renowned qualities that make it special to us all. You and your agency should, above all else, develop and maintain a management plan for the UMRBNM that emphasizes conservation principles.
6051	1728	Emphasize conservation principles and do not allow development or uses that defeat the protective purpose of the monument designation.
6051	1771	Emphasize conservation principles and do not allow development or uses that defeat the protective purpose of the monument designation.
6051	1804	This area needs protection from many threats and many interests. It is a publicly owned jewel and must be conserved. No more roads, no development of oil and gas, no more motors on or off the river, restrained campsite development (hooray for maintaining the more primitive character of the river downstream of Judith Landing!) --- in short, preservation of the same primitive and wild character the Missouri and its environs have offered those of us lucky enough to have experienced it already.
6051	1899	I am writing to encourage you to keep the Missouri River Breaks in pristine condition. Please examine and implement the very best conservation plan for the Breaks. For myself, all Montanans, and for generations to come.
6052	65	Area should be kept as legacy for future generations as it is.
6052	101	The primary reason the Missouri Breaks have been made into a National Monument is their emptiness: They remain close to what they were when Lewis and Clark came through. This is their true attraction, and that feeling of emptiness should be maintained, rather than diluted through excessive access, especially motorized. The Breaks don't need more all-weather roads, restaurants, or scenic overlooks. They essentially need to be left alone, because visiting the Missouri Breaks is about being alone.
6052	102	The essential nature of the area can be retained by adoption of a management plan that will maintain the natural and historical character of the monument. I urge you to adopt a management plan that will maintain the de facto wild quality of the area--keep the ATVs and the jet skis away. Keep its grim beauty, pristine, out of control, and everlasting.
6052	115	25 years from now the area should be in better condition or minimally the same. More trees, animals, fish, and good flora, better weed control.
6052	117	Mainly leave the area as it is, with as little changes as possible.
6052	118	In order to maintain the breaks' wild, historical essence, I do not favor development. This would only destroy the meaning of the designation.
6052	161	Please adopt a management plan that strives to maintain the wildness and solitude and wildlife of the breaks.
6052	179	I would like to see the breaks in 25 years just as it is today. Please don't let the Bush appointees in Washington force a pro-development management plan on Montana.
6052	182	The river is about the most enjoyable of my outdoor experiences and I would like it to stay much as it is.

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6052	1681	Flathead Wildlife Inc.'s major concern is that the lands and waters within the monument will be designated and managed in such a manner that many would-be visitors will be unable to enjoy the wonder of the area. The preservationists have no concern for the aged and handicapped who must use some form of motorized transportation to enter and enjoy their lands. Basically, the management plan should be directed toward the traditional land uses of the past; to preserve, protect and manage the area from unsatisfactory users and uses.
6052	1703	Having spent some quiet, magical days on the Missouri, I ask that that character be maintained.
6052	1704	I'd like to see the Missouri Breaks area remain wild and scenic. Keep it quiet and peaceful.
6052	1735	Historically, recreationally, and economically, it is a unique draw to Americans and foreign visitors because of its natural state and perhaps the only stretch of the Lewis and Clark trail that can be viewed close to its natural state at the time of the exposition. This section of river must be maintained in its quiet and primitive condition.
6052	1740	Please manage this special place so the next generation can experience the quiet, beauty, wildlife and history as we did.
6052	1745	The Missouri Breaks is a special place, and it should remain so. Allowing motorized use reduces it to yet another devalued, humanized landscape. The wildness we Montanans so appreciate are rapidly disappearing--should we let the Missouri Breaks go too?
6052	1748	The aspect of the monument that we value most highly is its remoteness, wildness, solitude, and geologic features. It is our vision that this monument remain wild, solitude, and that its geologic features not be impaired so that future generations will have the opportunity to enjoy the monument as we do today.
6052	1753	I am writing to encourage keeping the Missouri Breaks as natural as possible.
6052	1757	I have enjoyed the Breaks for 25 years and would like to see it left as is--no developments or improvements.
6052	1775	I enjoy floating the Missouri River because of its wild and scenic nature. Please keep it that way for all Americans to enjoy.
6052	1806	Please work to keep our natural values intact.
6052	1836	The solitude, grandeur, wildness and historic significance are wonderful but in danger of disappearing unless BLM creates a comprehensive and well thought out management plan. The wild and scenic stretch belongs to more than just the current generation. It's a living glimpse into the past for future generations.
6052	1854	Always include management protocol, policy, statements in the forthcoming draft Breaks NM management plan which clearly identify and recognize that the American public wants more of that which we own (subject federal lands) in the region to remain wildlands and wilderness, not less.
6052	1880	I suggest that the management plan emphasize the wild, undeveloped character of the Monument.
6052	1881	I have seen first hand how open space is used up by many forms of development and I do not want anything of a similar nature to take place in the monument. We sometimes do not recognize the value of our open space in Montana, so treasure the monument. It is the charge of BLM to keep the primitive open space nature intact.
6052	2032	In keeping with the Proclamation designating the Upper Missouri River Breaks as a national monument, the overriding management principle should be to retain the remote, undeveloped character of the Monument, which in turn provides protection for its biological, geological, and historical resources.
6052	2042	The hand of government management should remain as light in this area as it has in the past.
6052	2734	The way things have been going in my life time (80 years) there has been so many negative changes it leaves one to wonder the future. I speak now for what little is left, our National Monuments. Indeed, perhaps the best we can do for them is let nature do what has been going on for all past time. Maybe we should just stand back and enjoy watching what nature has given us. Seeing that there is no selfish utilization of course must be part of the watching.
6052	2923	I encourage your RMP to further ensure the integrity of this wondrous landscape, so that future generations of visitors (plants, animals, humans) can enjoy the UMRBNM without the attendant damage of industry and development.
6052	5695	I too, as many of you are, am mainly concerned about road closures, emergency response, fire protection, hunting and grazing, protection of private property from trespassing, and the right of private landowners to use their land as currently done and, of course, gas development.

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6052	5699	I would like to see the new national monument managed in the same way as under the Wild and Scenic designation. I use this portion of the river every year and believe that it should be managed using the concept of the most opportunity for the most people. This river is owned by all, not by a few and should be managed as such.
6052	10001	The monument should be managed to retain its remote, undeveloped character, which in turn will provide protection for its biological, geological and historical resources.
6053	87	If traditional uses will continue then existing cattle grazing and motorized ground or air travel should be allowed to continue. Why does "keep the primitive nature of the area, respect existing mining & gas claims, preserve in natural state and solitude" require grab and restrict more land so that more people can drive & tramp around following the L&C trail?
6053	1843	Management of this new monument does not attempt to make any changes in the use of the lands for agriculture, that is promise made and it should be kept.
6053	1860	Other land uses continue to be part of the monument, but these land uses must be viewed and approached in a way that ensures the long-term health and viability of the area.
6053	1862	Restrictions such as prohibiting cattle grazing and watering, closing roads and trails, charging user fees, allocating boater/floater systems, limiting economic opportunities or traditional use in the monument should be avoided when developing the management plan.
6053	1862	Please continue to follow the multiple use mandates set up for the Upper Missouri national Wild and Scenic River as management plans are made.
6053	2010	BLM should be specific in identifying uses that will be acceptable/allowable.
6053	2012	Maintain multiple use. Do not use endangered species and other radical environmentalist tactics to promote non-use and wilderness. Work with the ranchers instead of against those who have kept the land "much the same as when Lewis and Clark saw it".
6053	2012	Maintain multiple use and local control for those who live and work in and near the Monument.
6053	2029	Public land should benefit all and great care must be taken not to restrict access to a chosen few based on imagined red herring concepts of "wilderness", "quiet", or "type of human activity". In today's world, temporary conflict (i.e. seasonal or noise or wildlife breeding) must be accommodated, particularly in retaining existing traditional uses.
6053	2035	With over 80,000 acres of private land included within this designation, prohibiting or reducing commercial activities on BLM land may eventually lead to restrictions on private lands within the boundary. Although private lands are considered separate and not affected by the designation, the BLM must take into account that some groups will demand that all rules apply across all lands within the boundary. BLM must continue to promote management of these lands for multiple uses because when managed in this way, a host of users benefit.
6053	2038	Under no circumstances should the BLM develop restrictions in any form that infringe on economic opportunities or traditional use practices in the monument.
6053	2042	The areas within the monument have survived relatively intact after more than a century of use by settlers.
6053	2042	Traditional uses of the land should be allowed to continue. This includes grazing, hunting, mineral access, recreational access, and other uses. The only exceptions would be in "natural areas."
6053	2043	This is a recreational management problem first, and all other things are of secondary nature, and the need will only grow with each year. Forget all this bs about multi-use and get with the real number one problem that is to manage people and not cows and holes in the ground.
6053	2046	The multiple use mandate should be continued. This serves many different interest and has proved successful in the past.
6053	2046	Remember this monument designation was called "necessary" because the breaks areas were so well preserved they had to be protected. The RMP should honor the management that has accomplished this and let it continue.
6053	2047	The Wild and Scenic designation on the Missouri along with its multiple use mandate did accomplish protection for the river corridor and the riparian area concerned. If it wouldn't have worked, then the "pristine" area of the Monument that Babbitt and President Clinton so strongly recommended as needing protection would not have existed. I feel strongly that the multiple use mandate of the Wild and Scenic Missouri should be included in the Monument RMP.

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6053	2048	I believe that many people in the environmental groups view monument designation as a vehicle to eliminate livestock from the public lands in the area. They appear to be well funded and apparently have a lot of time. In short, ranchers will never be able to compete with them if every issue becomes a numbers game. I feel strongly, therefore, that the monument RMP should include a strongly worded multiple use mandate. Let's take some of these issues off the table. I would ask you to remember all of the promises that were made regarding multiple uses in the time period prior to designation.
6053	5092	While multiple use strategies were viable during the years of Pinchot and Roosevelt, that strategy was only viable when natural resources were abundant. Today we have many acres of "natural lands" that include tree plantations, grazing lands, mine spoils and the like. These are human artifacts which are lost for several hundred years from natural or wild status.
6053	10008	Continue to honor and support the multiple use mandate for the Upper Missouri National Wild and Scenic River in all monument management planning and decisions.
6053	10008	We don't want restrictions in any form that infringe on economic opportunities or traditional use practices in the monument.
6054	31	Preserve high quality outdoor and back country public recreation (protect wildlife & environment). Maintain the area's natural character (primitive quality). Keep the area wild and solitary. Protect the river and adjacent upland areas as a cohesive wildlife rich unit.
6054	92	Limiting development to existing sites should help preserve the wild and undeveloped character, biologic, geologic and historical values of the monument.
6054	111	To preserve the Monument in its present state the BLM must not allow: 1. Motorized recreation-land or water; 2. Interpretive center; 3. Oil or gas leases. In other words, leave it in as natural a state as possible.
6054	124	I urge you to adopt a management plan for the Monument that preserves the wild, undeveloped character of the monument. In this way, the biological, historical and geological values will be protected.
6054	134	We are asking you to preserve the monument.
6054	171	The habitat and character of the surrounding area needs to be preserved.
6054	1678	That land is just as much mine as theirs despite me living in Missouri just as the Ozarks National scenic river is theirs as well as mine. They have no more rights as to deciding what should be done to the monument as me or any other citizen. My opinion is that land should be preserved for all to use not just ranchers/hunters/resource exploiters. A fee should be charged to enter but not too much say \$3-5 per vehicle.
6054	1695	It is the duty of the managing public agency to administer this resource by standards of accountability which anticipate the judgment of those future generations. To this end, improvement and preservation of the natural ecosystems of the river riparian zone and the sage and short grass ecosystems of the upland zones must be a top management priority.
6054	1706	Landscape should look the same in 25 years with no uses occurring that are not occurring now. To determine if too many people are using specific portions of the monument, study effects on land/area and monitor number of people through the area. No human activities and uses (OHV, O&G, etc.). Should have bathrooms, tour-information booths, trails/roads, parking, administration. Preserve it in its natural state and working in concert with all involved to see that the most use possible is made short of losing the natural state. It should be managed through an oversight committee and by guidelines set up by those interested parties.
6054	1712	Give preference to preserving the wild character of the Breaks in your planning. As Teddy Roosevelt said, "We are not building this country of ours for a day, it is to last through the ages."
6054	1715	Please manage this unique area with an eye to its long-term preservation and use by generations to come.
6054	1718	The guiding principle and the value that should dictate all other possible uses in the monument should be to preserve and restore the undeveloped and wild character of the monument.
6054	1725	Preserving and restoring the remote, undeveloped, wild character of the monument should be the overriding principle.
6054	1743	As the 200 year anniversary of the Lewis and Clark Expedition approaches, the BLM should enact a resource management plan to preserve the beauty and value of the breaks and the wild and scenic Missouri River to protect the timeless beauty inherent therein.

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6054	1755	Preserve and restore the remote, undeveloped, wild character of the Breaks. We should not deal away our children's heritage.
6054	1756	The monument deserves to be preserved to maintain its wild character.
6054	1759	My concern is preservation of our land, wildlife and natural resources.
6054	1778	I would hope that sound scientific principles were used in the management of the monument that would preserve and restore its wild, undeveloped character.
6054	1790	The opportunity to encounter a landscape little changed since the first visits by non-natives constitutes, in my view, the overarching value of the UMRBNM. In no other location can we experience large-scale landscapes that remain so similar to conditions met by our first European explorers and so rich in scenic, wildlife and archeological values. It is my hope that the management plan for the monument will, above all else, preserve these qualities.
6054	1794	The core of the monument is the Wild and Scenic River, and it includes several WSAs and other wild areas. This is the only remaining piece of the Lewis and Clark trail on which visitors can come anywhere close to experiencing the conditions of that great exploration. Therefore one of the key management goals must be to preserve the existing wild, undeveloped, primitive nature of the area. In fact efforts should be made to restore those conditions where they have been damaged.
6054	1803	Preserve the natural and historic resources.
6054	1808	We have so few quiet, natural places left. We must do all we can to preserve them.
6054	1813	The management should include preservation and restoration of its wild character.
6054	1816	Be sure your management plan includes preserving the monument's wild, undeveloped character.
6054	1829	The most important quality to enhance and preserve is the wild feeling of the area. All activities that compromise this natural setting should not be allowed. These banned activities should include mining, oil and gas development, grazing near campsites, motorized vehicle use in the monument and motors on boats in the wild and scenic section of the river. Wild is not compatible with development and motors.
6054	1832	I'm writing today to urge protection for the MBNM by preserving the wildness of the landscape.
6054	1836	When decisions are to be made, always err in favor of the Missouri Breaks as a unique and wild ecosystem. There are only 150 or so miles on the river so protected and special. The remaining 2300+ miles feel the effects of civilization. Please preserve the wild and scenic stretch.
6054	1849	The BLM should look carefully at the wild nature of this land and how special a place it is and make sure that the Monument Plan does everything in its power to protect the breaks and retain this natural beauty. As a Montanan, the BLM should recognize how much I view this monument as a state treasure and I want it to be managed in such a way that it is preserved in all its wild splendor now and for future generations.
6054	1860	The overriding emphasis in developing the management plan for the Monument should be to preserve and restore the undeveloped, wild, primitive nature of the area.
6054	1867	Preserving the wild undeveloped character of this area and returning ecosystem health where needed should be the primary objective of the RMP. To pursue this priority in a meaningful way will require considering the individual components of the monument's wild character, while at the same time recognizing that their combined effect is greater than the sum of their parts, e.g., to restrict grazing in sensitive riparian areas in order to protect a resource, while allowing additional gas exploration to degrade wildlife habitat would be counterproductive to this objective. Specific resource management decisions should be based on available science from peer reviewed publications when available, and management should err on the side of protecting wildness should such science be either unavailable or inconclusive.
6054	1882	The preservation and restoration of the remote, undeveloped character of the monument should be the guiding principle of the management plan.
6054	1883	The driving reason for the establishment of the Monument was to preserve it as a unique and precious part of our nation's history.
6054	1889	Preserve history and historical perspective at all costs. Lewis and Clark were here as well as countless generations of Native American inhabitants.

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6054	1890	I urge you to adopt a management plan for the MRBNM that preserves and restores the remote, undeveloped, wild character of the UMRBNM. And, I would like to stress "national" neither Montana nor local concerns. This will require stringent controls over off road motor vehicles, motorized water craft, and grazing in the area. We will have only a single chance to preserve this area. We cannot fail our posterity.
6054	1891	The wild nature of this area should be preserved and restored as much as possible.
6054	1946	Fully preserve all roadless areas.
6054	2010	Management must place priority on conserving, protecting and restoring the natural and cultural values of this landscape, and must identify and restrict those uses of the land that are secondary to that objective.
6054	2021	The BLM should identify and establish, with help from local, state, and federal scientists and agencies, baseline data that covers all the objects identified in the proclamation, then manage for maximum protection and preservation the geologic, paleontologic, archaeological, biological, historical and cultural resources noted.
6054	2038	Think about adopting a new motto for the monument that sets a new tone and management direction such as UMRBNM -- a monument dedicated to the spirit of the American West; or a new title, Spirit of the West National Monument -- dedicated to preserving the Western Heritage. Right now, local perception is that the BLM is going to turn the area into Disneyland -- like it or leave it.
6054	2038	The direction we seem to be heading is - run off the landowners, forget them, and turn the region into a recreation area that ignores local concerns and supplants responsible natural resource development with land preservation policies. Alternatively, the high road to monument success could be paved in part by recognizing the important role the local lifestyle has played in safeguarding at least some of the attributes of the monument and that management of the area will actively seek ways to help keep those families in the area. Absent at least part of that philosophy being incorporated in the management theme, the Missouri Monument will succeed with great difficulty.
6054	5690	I grew up in Wyoming and love the American west. I am as concerned as anyone in the country for the preservation of wild and historic places throughout the west. However, I do believe that groups like the Wilderness Society, Earth Island and Bluewater Networks (to name but a few) are at the extreme fringe of the political spectrum inasmuch as their activism is extreme and absolute. Please use common sense (as I know you will) to reach the final resource plan, and temper comments from such groups as I have mentioned above. There is such a thing as balance (balance is not spelled exclude as some would try to convince you) in the world of management and administration plans.
6054	5691	My preference would be to preserve as much of it as possible as wilderness. We already have a severe shortage of lands not adversely affected by man's efforts to manage and use lands for economic gains. This shortage of wilderness will only get worse as our population continues to increase.
6054	10003	The Missouri Breaks National monument should be managed to protect its wild, undeveloped character. By preserving the wildness of the landscape, the monument's biological, geological, and historical values will be protected.
6054	10007	Proper management of the Monument should preserve and restore its wild, undeveloped character.
6054	10009	First and foremost, the RMP should preserve and restore the Monument's wild, undeveloped character. In doing so, the plan would also protect all the other resources for which the monument was set aside.
6054	10010	Preserve and restore the Monument's wild, undeveloped character. A plan that achieves this goal will simultaneously protect all the other resources for which the monument was set aside.
6055	23	Please preserve primitive quality of Upper Missouri Breaks.
6055	25	Please protect and restore the primitive quality of the monument.
6055	167	Protect the wild, primitive qualities of the river and uplands.
6055	176	An UMRB national monument as pristine and as natural as possible would be a gift to Montana and America.
6055	180	How are you going to develop this pristine area, allowing more people to use the area without causing a drastic detriment to the current tranquility of the area? You are going to ruin a good thing. It was a sad day when the monument was attached to the breaks.
6055	1713	Keep it primitive. Anything less will break faith with the public will that underlies the creation of the Wild and Scenic River and the national monument.

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6055	1754	Insure the quiet, primitive character of the area as Lewis and Clark found it.
6055	1809	All of these points center around the philosophy of keeping the area wild and primitive. This is what the Proclamation intended, and anything less will breach of faith with the public. I hope that when I return to the Missouri in 5, 10, or 15 years, I will have the same quiet experience in a remote primitive area that I have had in the past.
6055	1809	Development within the Monument should be kept to a minimum to maintain the wild and primitive character.
6055	1978	Limit signing within the Monument boundaries to provide to the public a uniquely primitive experience where the visitor is informed via printed information outside the Monument.
6055	1996	The overriding management principle should be to retain the remote, undeveloped character of the Monument, which in turn provides protection for its biological, geological, and historical resources.
6055	2010	The National Monument should be a living landscape untouched, to the maximum extent possible, by development, paved roads and ORVs, including dirt bikes, all-terrain vehicles, and jet skis.
6055	2010	BLM's goal should be to provide opportunities for visitor exploration and discovery in an undeveloped, primitive setting.
6055	2032	The section of river from Judith Landing to Kipp State Park should remain in its current primitive condition without well developed campsites and more motorized access.
6055	10002	Develop a management plan that preserves the primitive quality of the area to the greatest extent possible.
6055	10005	The primitive qualities must be preserved.
6056	17	An alternative that protects these areas from livestock use should be considered in detail.
6056	26	Bureau needs to develop a management plan that protects our fish and wildlife for future generations. New roads, towers and off road vehicles cause a very real threat to the environment.
6056	144	All management decisions, and thus the management plan, should be informed first and foremost to protect the wild and scenic values of the river. If that means a very restrictive travel plan, limited grazing, no mineral (resource extraction) and a year-long no wake restriction, so be it.
6056	169	I advocate a strong, environmentally directed management plan to protect forever its undeveloped character.
6056	183	Protect roadless areas.
6056	198	Please do not let "Ronnie" Rehberg and local landowners undo the wishes of the public in designating this a national monument. The key word is "national." Protection of this monument land from aggressive local interests and out-of-state energy companies is what the public wants.
6056	1695	BLM should have plans in place for minimizing the impact of resource users and controlling the number of users within the capacity of the agency and the resource to absorb their impacts. Protecting the wild character of the landscape precludes development of a large number of user service sites. The people management strategy should remain focused on the five prime access points already in existence with tread lightly/pack-in, pack-out policies for the remainder of the challenge.
6056	1707	The management plan must not permit development or use that destroys the protective purpose for which the monument was established. The plan should be designed to protect the undeveloped and wild nature of the land in the monument. Doing so will enhance and perpetuate the area's biological, geological and historical treasures. It should be managed so as to maintain the landscape largely as it was when the famous Lewis & Clark expedition traveled the area nearly 200 years ago.
6056	1714	The best management strategy is a policy that limits use. I want to see a resource management plan that protects the natural values and wild character of the new national monument while allowing controlled use.
6056	1716	The Wild and Scenic Missouri can be a very special refuge from the constant noise of our everyday lives if we take care to protect it.
6056	1745	Administer all public lands for maximal protection, and provide incentives for private landowners to do the same.

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6056	1748	BLM's first priority should be to protect the objects and resources outlined in the proclamation. The BLM should develop goals and objectives that protect the objects and resources and that protect the biodiversity and health of the ecosystems found in the monument. The goals and objectives should be measurable so that progress, or lack of progress, can be tracked. Reports should be developed and provided for public access for those individual or groups who are interested in how well the monument's ecosystems are progressing. Once a goal or objective is achieved, new goals and objectives should be developed in order to help the management planning move in a forward direction.
6056	1767	We hope that BLM will manage the Monument in a manner that protects the dispersed, primitive and non-motorized recreation values; cultural and historical values; and world class biological resources of the area in the fullest sense. To the maximum extent possible, the BLM must emphasize leave-no-trace activities that are consistent with the proper care and management of the resources, values and other objects protected in the Upper Missouri River Breaks National Monument, rather than extractive development and ground disturbing activities that may harm these resources and values.
6056	1794	During the years I have been floating the Missouri there has been a steady increase in the number of people using the river. This trend is sure to continue. Management must adjust to this increase in people pressure to protect the resource so people in the future can experience as much as possible of the magic of the Missouri that I have known for over thirty years.
6056	1806	Please consider the Missouri Breaks and the Monument as one of our nation's last great wild resources without adequate protection, and do something about it.
6056	1811	A plan must be phrased as to unmistakably and genuinely protect in perpetuity all the natural and historical attributes of this splendid public possession and the wildlife that is present there. There is no place here, or in any other national monument, for a so-called "creative management" scheme that would place control in the hands of special interests where abuse would be assured. The national monuments are treasures that belong to all of us. No segment of our nation has any special claim to any part of them.
6056	1829	Much has changed on the route that Lewis and Clark took on their impressive fact finding journey. The breaks is one of the few areas that these explorers would still recognize and for this reason this area needs full protection.
6056	1853	I currently work in Glacier National Park, but I find more solitude in the Breaks. Solitude and wildness are rare and rapidly diminishing landscape attributes, and I hope the management plan does all it can to protect those values.
6056	1892	Our favorite pastime is rafting on rivers throughout the west and this one is truly a unique and priceless resource, no doubt on a par with favorites such as the Selway, Colorado, San Juan and Salmon. If not protected now, it will be a sad day on the planet later.
6056	1996	Adopt a precautionary management approach and manage uses to prevent damage to Monument resources (biological, cultural, historical, paleontological, archaeological).
6056	1996	Specific Management Recommendations to Protect Remoteness and Provide for Visitation: The BLM must incorporate decisions that address anticipated visitation increases in the RMP. This should be done in a proactive manner using tools such as group size limits, allocations, and use zones. Such methods are easier and more effective tools for controlling the impact of visitor use, rather than letting damage occur and then trying to mitigate after the fact. This approach will also help the BLM avoid the difficult circumstance of having to decrease recreational opportunities in the future to avoid exceeding carrying capacity. The cumulative effects of private individual visitors should be analyzed and considered as well as the impacts of organized commercial recreation. Limits of acceptable change should be established and adhered to in the RMP. Should allocation for use of monument lands and waters become necessary, the standard for visitation of the monument should be one based upon individual public utilization not private commercial allocation. Commercial recreational interests seeking to use monument lands and waters should receive no guaranteed or privileged access rights. Policies should be adopted such that private, commercial recreational use of the monument does not displace, limit, or otherwise restrict general public opportunity to access and enjoy the resource.
6056	2010	All planning and decision-making activities must tie off the proclamation and, consequently, the objects of historic and scientific interest must be prioritized for protection and management.
6056	2010	BLM's first priority is to protect the objects and resources outlined in Proclamation 7398.
6056	2010	BLM must develop goals and objectives that protect the objects and resources described in Proclamation 7398 and protects the biodiversity and health of the Breaks ecosystem.

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6056	10001	I ask that scoping, and indeed all aspects of planning for the Monument, protect all the resources and objects that are included in the Presidential Proclamation that established the Upper Missouri River Breaks. In fact, the agency should develop specific, measurable goals for the protection of these resources.
6056	10005	The natural, scientific and historic values of the Breaks must be protected in the management plan.
6057	1751	Rehabilitation must be a large part of management.
6057	1803	Restore the native vegetation that has been impacted by years of livestock grazing.
6057	1809	The overriding management principle should be to retain the remote, wild and undeveloped character of the Monument. Efforts should be made to restore primitive conditions where they have been damaged. If this principle is followed in the creation of the management plan, it will provide protection for the biological, geological, and historical resources of the Monument.
6057	3703	It is very important to me and my family that the Upper Missouri River Breaks National Monument be restored to the conditions of the time of Lewis and Clark. The main reason to visit the area is to experience this place as an historical monument.
6058	116	How can we be assured that the wilderness will be prudently managed, allowing thinnings, etc. instead of being controlled by environmental extremists (i.e. the next Democrat administration) who want it left untouched, unused and unenjoyed by anyone?
6058	125	The highest priorities in this plan should be preservation of the wilderness values with a very strong undeveloped character.
6058	1702	It is so beautiful, and the potential is great if you would just take a few simple steps to protect its quiet wilderness beauty.
6058	1744	Protection of roadless lands must be addressed early on.
6058	1746	The Breaks should be managed for as much wilderness character as possible.
6058	1751	Ultimate wilderness designation for the crown jewels of the monument is the best protection. Let biological scientists determine what is wild and natural, not local committees.
6058	1768	The subdivision, development, and motorization that has occurred on the non-Wild and Scenic portions of the river has precluded any kind of wilderness or backcountry experience, even on the relatively undeveloped portions of the river such as the Gates of the Mountains corridor. This last ecologically, recreationally and historically important stretch should receive maximum protection from the fate that has befallen the remainder of the river. The Wild and Scenic portion is about one-half of one percent of the river so it's far too late to talk about "balance" between motorized and non-motorized use.
6058	1770	As you develop the resource management plan for the monument, please consider the wilderness quality of the public wildlands, wildlife habitat, unmotorized recreation, and the historical values that should be protected.
6058	1824	Wilderness has the most successful maturity rate, most kinds of life forms, best reflexes and brings all the atmospheric precipitation to the world and best health ratio of all its diverse populations.
6058	1831	The Missouri Breaks National Monument needs to be handled as open plains wilderness. Returning elk, bison, and grizzly would be great also.
6058	1854	Think, state, broad, inclusive management language in this draft Breaks NM Management plan which specifically and precisely identifies the massive resource and land base responsibilities that we have today for future inclusions and enlargement of wildlands/wilderness designation in this internationally significant region. The Breaks NM and its management plan is but a beginning, not an end product.
6058	1864	Manage primitive areas as wilderness.
6058	1976	BLM should continue protection of roadless areas, whether recommended to the Congress for wilderness designation or not.
6058	2010	Protect the outstandingly remarkable values of the wild and scenic river segments from harmful activities conducted outside of the segments' boundaries (Wilderness Society v. Tyrrel, 918 F.2d 813 (9th Cir. 1990)).
6058	2030	Please maintain the current quiet wilderness fee of many areas of the new MBNM, because once human development has intruded on fragile ecosystems such as the Breaks, our impacts cannot be withdrawn. The salient feature of the new monument is its relative lack of human development.

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6058	2038	Under no circumstances should the BLM develop restrictive zoning in the monument to achieve de facto "wilderness like" areas.
6058	3125	I hope I will find its wilderness characteristics retained with actions to remove the remaining intrusions such as roads, cows, and overgrazed rangeland.
6058	5222	I tend to be nervous when I hear a new plan is being developed for a site that seems to have escaped notice for some time. It seems that the current state of affairs is that people start looking at how do we get the most out of a site. That discussion rarely includes leaving a place alone so that our children will have a chance to see raw wilderness and make their own decisions about its future.
6058	5694	I am opposed to anything that is not a designated wilderness being managed as such. Wilderness is useless wasted land.
6058	10008	We don't want restrictive "zoning" in the monument to achieve de facto "wilderness-like" areas.
6100	17	We would like to know who the Interdisciplinary Team Members, Decision-maker and BLM contact Personnel are for this project and how we may contact them by phone, address and email.
6100	1854	Page 1: The BLM statement "This national monument includes an ecosystem that parallels the Upper Missouri National Wild and Scenic River (UMNWSR)" reads as though the Breaks National Monument is separate from and does not include the UMNWSR, but only parallels it. If that is the BLM position, it is incorrect, is legally questionable, and will generate considerable undesirable controversy in the public management of the UMNWSR and the monument.
6100	1996	Following adoption of the Resource Management Plan, the BLM should provide specific timeframes detailing when evaluations will be performed to determine 1) Whether plan decisions are being implemented, and 2) Whether the BLM is meeting the RMP objectives. These timeframes should be specific and available to the public.
6100	1996	To the extent that new information or actions address issues covered in the Monument RMP, the BLM should integrate the data through a process called plan maintenance or updating.
6100	2010	Enforceable monitoring and evaluation programs with defined time frames should be built into all decisions and in fact implemented.
6100	2010	The RMP should establish specific time frames and reporting requirements for all levels of the AEM process.
6100	2046	In the introduction of the RMP dealing with the history of the area, homesteading and ranching should be included along with the Lewis and Clark era.
6100	2047	The introduction to the final RMP should include the history of the area included in the Monument, and also mention should be made of communities and ranchers that do and will continue to exist in the area. It is essential that anyone reading the introduction to the RMP understand that this not only affects the land involved, but also the people that live here.
6100	2048	I would suggest that the introductory pages of the RMP include not only the multiple use mandate, but also a brief human history of the area and an explanation of the role ranchers and farmers have had in keeping the area pristine and worthy of so much attention. There are many of us who would be happy to volunteer our time (winter) to help write these pages.
6101	17	Missing components: Please outline any plants or animals (including aquatic organisms) that historically were present on this landscape that for whatever reason are no longer found on the affected environment.
6101	17	Please list the native species that use the project and cumulative effects analysis area.
6101	17	Please include maps and photographs illustrating the various resources and impacts on the project area in the environmental assessment.
6101	17	Please identify the size of the Project and Cumulative Effects Analysis Area on a map in the environmental review.
6101	156	Uses that harm or degrade the monument resources should be prohibited and the impacts of any proposed use must be vigorously reviewed through comprehensive environmental analysis.
6101	1854	We strongly advocate that the BLM will immediately effect the preparation of an EIS to evaluate the environmental effects of the proposed BLM "Breaks National Monument management guidance for the BNM" per NEPA, and not an environmental assessment paper exercise.

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6101	1854	Be certain to openly and publicly identify the lack of information, the lack of specificity of information/data. Do not attempt to hide these deficiencies, or to gloss over the lack of precise data critical to propose and/or effect any given action, policy, issue. Acknowledge that the data do not exist, or are deficient, then state how these data will be secured, and any dependent actions, policies, be withheld, place on hold until the critical data, information are acquired. It is not acceptable, nor legal per NEPA, to simply imply that BLM staff have inherent knowledge, which is simply opinion and bias, about an issue, action, policy, and then simply proceed. If BLM has the essential data to prepare this NM management plan, great, if not, tell us up front and describe how this affects this proposed NEPA action.
6101	1913	In order to know how well the management plan is working it is essential to establish the baseline condition and distribution of plant and animal species, and to institute a program of regular monitoring.
6101	1926	We assume that full study will be given to issues such as wildlife, ecology, scenic integrity, protection of public land resources, recreation, visitor use, interpretation and safety; integrating monument management with community, tribal, and other agency needs; and access and transportation on the public lands. However, the effect on all these issues from actions taken on land surrounding the Upper Missouri River Breaks National Monument or actions taken on private inholdings may not receive sufficient attention. We request that the cumulative impact of both negative and positive actions occurring on adjoining land be given study in the RMP/EIS.
6101	1968	Consider cumulative impacts occurring on adjacent lands both private and public.
6101	1978	Develop information other than maps, regulations, and safety precautions that are educational and serve to interpret the landscape of the Upper Missouri River Breaks region and help to put the emigrant journey across the land into perspective.
6101	2001	Establish monitoring programs to insure adherence to management plans for wildlife habitat enhancement, grazing, travel, river travel, weed control, and other people use controls; establish enforcement measures to respond to related problems.
6101	2010	BLM should describe in the plan how resources and objectives would be monitored and evaluated.
6101	2010	All data should be identified in terms of its source, location, and time. Furthermore, data – and its application – should be available for independent review and evaluation. Data collection and application practices should be formalized and standardized to allow for sophisticated and accurate aggregate understanding of the landscape and the impacts of management practices within the landscape to enhance agency credibility and accountability. The BLM should disclose not only the results of a given analysis, but the underlying methodology and data management practices used. The focus of data collection should be on the impacts – whether adverse or beneficial – caused by particular activities and not the activity itself.
6101	2010	BLM should address how the plan will be updated and management changed based on new information gained from monitoring and evaluation.
6101	2010	The AEM framework should incorporate and link to the cumulative impact analysis completed pursuant to 40 C.F.R. § 1508.7. The cumulative impact analysis should operate as a mechanism to gauge the impacts to the objects of interest protected by Proclamation 7398 and the total health and integrity of the landscape. In so doing, the BLM can ensure that individual and cumulative activities conform to the RMP and other legal thresholds.
6101	2010	BLM should develop goals, objectives, and desired outcomes that are measurable so that progress in meeting them can be tracked.
6101	10001	Uses that harm or degrade the monument resources should be prohibited and the impacts of any proposed use must be vigorously reviewed through comprehensive environmental analysis and public review and comment.
6102	117	It seems the visitors center etc. has already been decided. Perhaps they and other points of launch could have maps and other information regarding history, vegetation, cultural values, laws regarding use of the area, etc.
6102	172	Recognize the need for adequate funding to manage the monument, including enforcement and interpretation activities.
6102	180	How much does it cost to maintain and operate the monument? How come there is no information given on budget/cost when this plan is developed? As a taxpayer I think it only fair for the BLM to publish costs, letting the people know. Planning is great if there is a budget to design by.

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6102	180	How do you propose to provide public/local service i.e. ambulance, fire, visitor information, rest areas, police? At whose cost, local, state, or federal?
6102	1695	A historic problem of resource protection in the Breaks has been the financing of the management activities of the BLM. I recommend the monument manager initiate a practice of annually publishing the operating budget of the monument and the funding needed along with the source of such funds. The purpose of this process would be to give the public the information it needs to hold political leadership accountable for properly financing management operations.
6102	1748	The BLM should include in the management plan how the management activities of the monument will be funded and implemented. Additionally, the BLM should address how the plan will be updated and changed based on new information derived from monitoring and evaluation.
6102	1796	Make #1 the management of the monument under a person or persons with great field experience as well as their knowledge of textbook information.
6102	1852	I know your need for facilities is urgent, but when you build, build with an eye on the landscape. Don't erect the expedient--wait until you can do it right, because whatever you build will be there three or four times longer than you envision. Make sure your superiors know what a trailer house ghetto does to the landscape. Use your resources to set a good example of what should be erected in the river corridor.
6102	1854	Locate the Missouri River Corridor and Breaks NM, one and the same, administration and staff in Fort Benton, MT.
6102	2010	The BLM should ensure that sufficient funding is provided for mitigation, monitoring, restoration, enhancement, reclamation, and other protective actions to ensure the preservation of the National Monument's values. Furthermore, if a particular management activity is not granted funding for associated mitigation, monitoring, restoration, enhancement, reclamation, or other protective actions, then the activity should be prohibited from going forward.
6102	2010	BLM should address how the plan will be funded and implemented.
6102	2012	Track Monument expenses and publish the figures, so the public understands what a Monument of this size costs.
6103	9	My interest is seeing that the outcome of this process leads to a model of management that is inclusive, in that it recognizes conflicting interests. The management and protection will be best accomplished by a process of inclusion in which local interests are recognized and served at the same time as the Monument is protected. Who gets to define "community needs"? The positions taken and defended over the past two years do not admit to an easy determination of these questions. I suggest as a simple starting point the ground rules for proceeding to resolution: 1. This cannot be about people. Individuals who have expressed strong, sometimes irreconcilable positions must back away from the business of confronting each other; 2. The advocacy of positions must give way to a consideration of interests; 3. The process will have to generate a set of options, possible solutions on issues that may divide parties. The process must be seen to be fair by the parties involved.
6103	30	Local and community participation is seen to be critical. The process must be seen to be fair by the parties involved.
6103	30	The resource is huge in that it contains a great variety of information that can be studied by biologists, geologists, archaeologists, paleontologists, and historians interested in unearthing scientific and historical data that may be revealed. The Monument also requires protection to ensure that these sources of information are not destroyed or misused. The participation of the scientific community in subsequent decision making is thus critical to the maintenance of the Monument as a reservoir of learning.
6103	113	It is important to realize that the monument status has expanded the area outside Fergus County, and that other communities will be impacted other than Lewistown. I would advise you to involve the communities within the monument boundaries.
6103	118	Thank you for providing this forum so that we can express our wishes.
6103	153	Recently there was some concern about the sheep trapping that went on in the Ervin Ridge WSA. Mt F,W&P was not up to date on the requirements and had some last minute schedule changes due to weather, equipment and personnel availability and didn't get the coordination done with the BLM. BLM will send the current information to Mt F,W&P and will be updating signs as necessary. Between agencies, we need to know and understand what is going on so the public will have some faith that agencies are cooperating.
6103	1695	BLM should make full and continued use of the Final Recommendations of the Lewistown RAC (1999) as you prepare the first RMP for the monument.

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6103	1695	I recommend that the monument manager fully employ the Lewistown RAC as an integral part of the resource management architecture with such management decision-making conducted in open meetings.
6103	1748	The BLM should describe in the plan how it intends to involve the local communities and the public at large in the planning processes for the monument, as required by NEPA.
6103	1798	The BLM should respond to intelligent input and advice that is more concerned with keeping the Breaks natural and undisturbed, low impact contact with man. ATV interests and snowmobile interests, off-road vehicle interests are not concerned for the land--only with selling their products.
6103	1803	Involve the public on all planning steps.
6103	1804	I applaud the solicitation of public input, also, through the planning group for the monument's management (comprised of RAC members and representatives of various interest groups for the monument management plan -- your project manager, Jerry Majerus, seems to be ignorant of the group and its mission!).
6103	1818	Establish a management policy that says the Monument is a public area and that the public will not be excluded.
6103	1835	We have too long allowed surrounding communities to dictate the use of public lands. These lands belong to all Americans and should be protected for all.
6103	1852	Please find a local citizen's committee that you can trust to review the work of the professionals that will increasingly come to the fore. Engineers benefit from a critique now and then.
6103	1853	Affected landowners and other local residents should have a voice, but not a veto, in managing the monument. It is a national treasure, providing a vital link with our heritage as a nation.
6103	1854	Significantly improve the BLM information to the American public as to what our BLM employees are planning to do with our federal land and resources.
6103	1854	Specifically prepare a Breaks NM management plan which recognizes that the Breaks NM is a small, inclusive, but significant portion of the federal wildlands/wilderness of this region. Do not "think small" and/or "exclusive" in preparation of the Breaks NM management plan and plan in close coordination with the American public.
6103	1854	Do not use the local RAC consensus (advisory) group as the primary public information and advisory source for administration of our federal lands administered by BLM, specifically the Missouri River Corridor and the Breaks NM.
6103	1854	On-going BLM Projects, page 1 of the State Director's Interim Guidance states: "Table 1 (p. 2) lists ... In general, actions that are not precluded by the Proclamation and which do not conflict with the established purposes of the monument may continue, subject to compliance with the NEPA of 1969 and other laws." On the surface that statement appears appropriate and innocuous. However, it raises the critical questions: (1) when will the management policies, designations and allocations from existing plans be publicly listed for public evaluation? (2) Who will determine which can legally continue or be effected per the Breaks Monument designation during the proposed interim? (3) How will the public be actively, and timely, involved in these evaluations and determinations? (4) How will the public know if there are illegal and/or conflicting BLM actions and proposals within the existing plans or proposed BLM plans, all of which predate Monument designation by one to 23 years?
6103	1976	The BLM should establish a Resource Advisory Council that is solely devoted to the Monument. The Monument's long-term issues are complex enough to easily justify having its own RAC.
6103	1976	We believe that establishing working partnerships with state agencies, users, guides and landowners will continue to be an important aspect to the future management of the Monument.

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6103	1991	<p>In order to ensure any management proposal meets minimum statutory and regulatory standards and the requirements set forth in the Proclamation, the BLM must ensure its process meets at least the following standards:</p> <p>The agency must follow a systematic, interdisciplinary approach when developing the off-road vehicle component of any planning document. Off-road vehicles have a wide range of direct, indirect and cumulative impacts. Therefore, the team assembled to develop this component of any document must include, but not be limited to, individuals with expertise in geology, hydrology, wildlife biology, ecology, archeology, historic preservation, travel management and law enforcement.</p> <p>An extensive body of scientific literature documents the adverse impact of off- road vehicles on soil, water, vegetation, sensitive habitats, fish and wildlife, public land visitors, and cultural, archeological, and historical resources. Off-road vehicles are also significant sources of air, water and noise pollution. We have attached a bibliography (to comments submitted by U.S. mail only) of a portion of this literature to facilitate consideration of these impacts during the planning process.</p> <p>The agency must provide adequate time for public comment on planning documents, including scoping notices, the draft RMP and draft and final environmental impact statements (EIS). In many cases, the complexity of the issues, the voluminous size of documents and other factors require lengthy review periods.</p> <p>The BLM must ensure broad-based public participation during the planning process. The Upper Missouri River Breaks National Monument belongs to all Americans regardless of where they live or whether or not they will be privileged to visit it in the future. Although local input is valuable and should be encouraged, the views of all Americans must be weighed equally during scoping and plan development and implementation.</p>
6103	1996	Research should incorporate a public outreach program.
6103	1998	I would like to see the management plan controlled from the local level by a county commissioner from each county involved plus representatives that live within the area affected by the management plan.
6103	2001	Establish communication protocol with local civilian advisory groups.
6103	2032	Science and research should be supported and encouraged. The BLM should seek collaborative relationships with local, state, and federal scientists and agencies to facilitate appropriate scientific research and foster an ecosystem management approach that would benefit the protection and management of the monument's objects. Relevant information collected from scientific studies should be incorporated in the RMP as part of the Adaptive Management Framework. Research activities which are intrusive or destructive and which conflict with monument objectives should not be allowed.
6103	2035	In 2003, the BLM planning schedule includes collection of data and formulation of alternatives. The Montana Stockgrowers Association believes that involving landowners in this phase would be advantageous because landowners are a valuable resource because of their familiarity with the range, knowledge of historic land conditions and in many cases knowledge of wildlife and their approximate populations. Because of their "hands on" experience, landowners may also be helpful in providing a new perspective in developing possible alternatives. Along with gaining information, this would also provide open communication between the agency and the landowners or livestock producers. Good communication exhibited early in the process can alleviate or reduce future problems.
6103	2035	Holding the 11 scoping open houses has provided interested parties a chance to provide comments and voice concerns and also become more familiar with the issues that encompass this designation.
6103	2866	It is important to balance the needs of recreationalists, business owners, and visitors when it comes to making a plan for our lands. A good plan is one that best satisfies the needs of all parties involved. The best way to get to a good plan is to seek the input of as many parties as possible.
6103	4326	The opportunity to provide comments for the scoping process for the UMRBNM is a chance to stick together as Americans, and get it right!
6103	5692	I am concerned that the "private property" folks that disagreed with the original designation, combined with our state's current administration, will try to weaken or eliminate the essence of the river and surrounding lands through development, including oil and gas, and pasturing of cattle. The best possible outcome, in my opinion, is to manage the people and not the land, as natural processes should trump any and all personal and political agendas (including mine).
6104	3	EPA comments for preparation of RMP/EIS (45 pp.). See letter.

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6104	149	I believe the RMP process should serve to review all those things you have been predetermined apriori to have "no change," and in fact decide whether or not current management, leases, practices, etc. are appropriate and in line with new management status, objectives and public responses. Starting right off with a laundry list of "no change" assumptions for some of the items you listed preempts the monument planning/EIS process. For example, you need to review each existing O&G and other minerals leases to see if there are going to be potential conflicts and arrange to buy back the lease over time or have the leasee accept additional stipulations for resource protection; some existing roads that are no longer used which access abandoned homesteads do need to be permanently closed; etc. The RMP/EIS should be used as a management/decision-making process, not a "no change" stamp of approval.
6104	1767	Please consider the requirements of executive orders (there are several dating from the Nixon administration to the Clinton administration) on off-road vehicles, invasive species, riparian areas, flood plains, migratory birds, and environmental justice.
6104	2010	The RMP should outline the circumstances that necessitate reconsultation at the RMP level and the circumstances that necessitate consultation (whether formal or informal) at the implementation planning and decision-making levels.
6104	2010	BLM must engage in formal section 7 ESA consultation with the Fish & Wildlife Service (See Pacific Rivers Council v. Thomas, 30 F.3d. 1050 (9th Cir. 1994)).
6104	2010	BLM should prohibit recreational collecting of objects.
6104	2038	The BLM must use and comply with the Federal Land Policy and Management Act of 1976 as one of the basic management guides for monument planning and decisions which, by law, requires the BLM to coordinate with local governments in the planning area and consider the land use plans and policies that have been established by local governments.
6104	10001	As planners for the UMRBNM, you should consider each planning step within the broader context of the NLCS and what it was created to do.
6104	10008	The BLM must embrace and use the Federal Land Policy and Management Act (FLPMA) as the basic management guide for monument planning and development.
6500	1	I think we must mandate the Army Corps of Engineers and Bureau of Reclamation to emulate historic flows via Canyon Ferry Dam and the Tiber Dam on the Missouri and Marias Rivers respectively.
6500	2	The river's flow needs to correspond to historic floods and lows. Envision this coming from either removing the dams upriver to allow natural floods, etc. or managing the dams better to attempt a more natural flow regime based on historic evidence. You should actively seek out both endeavors. Throw out 'cost-effective' economics, power companies, and their death holds on public property.
6500	17	How does this decision allow for and mitigate the impact of natural catastrophic events?
6500	46	The Monument should be left free of all special interest groups.
6500	67	I am greatly disappointed in Ms. Barnett's decision to locate the headquarters in Lewistown.
6500	116	The inclusion of private land within the boundaries of this proposed monument is my issue. Why is so much land north and south of the river (at the east end) included in the monument? Leave those areas out of the monument and let owners choose for themselves whether to have their land included within the boundaries or left out.
6500	152	I believe in private landowners' rights.
6500	155	Since the areas originally designated as monument are ecologically important to the rest of the area including the river, I enthusiastically support maintaining the boundaries as designated.
6500	156	I ask that the BLM ensure that the boundaries established by the proclamation remain intact.
6500	181	I do not believe that it is right to include private land in the monument. It places a cloud over the ownership and the title of the land. I believe that all private land within the monument should be removed. Private property rights are at the foundation of all of our freedoms.
6500	190	Please leave the status of the private lands within the boundary of monument as they are presented.
6500	199	For persons like Rehberg to make a claim that private property rights will be adversely affected by the creation of a monument is purely false and only to promote their political ambitions.

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6500	1681	Retain private land ownership within the boundary. These landowners have more knowledge and keeness for the area than any other public users. They are also in a position to assist in the proper management and policing of the area. They, themselves, are a part of the history and solitude that the area is known for.
6500	1760	I would strongly recommend that the boundaries set forth in the original monument designation as approved and recommended by the RAC committee be left untouched and not altered.
6500	1761	Leave intact the boundary lines set forth in the plan and not altered to appease the private landowner, who at this time has a lifetime lease on the grazing rights as established under current rights.
6500	1843	The right of the owners that are bounded the MBM to sell their property to the people of this nation should not be taken from them. Removing them from the boundaries takes that right away or makes it very difficult for both the seller and the buyer.
6500	1844	Is this the beginning of Communism when the average person has no right to his private property because the people at a meeting who out numbered the local farmers needed our private land?
6500	1948	Return the monument boundary to the Wild and Scenic River boundary. Exclude all private property from monument rules.
6500	1976	We recommend that the Monument office not be located in conjunction with other field offices.
6500	1978	Identify suitable location(s) for visitor centers outside the boundaries of the Monument.
6500	1987	Wherever possible expand the boundaries so that the expansion will maintain, and perhaps increase the natural beauty of the place. Do not expand the boundaries if that means encroaching on private property.
6500	1993	We will continue to support the repeal of the Monument designation or at least the shrinking of boundaries to "rim to rim," excluding all unwilling private land.
6500	1996	Without a renewal of flow variability riparian recovery goals cannot be met. Therefore it is imperative that the BLM work with the Bureau of Reclamation, the Army Corps of Engineers, the USFWS, and state agencies to provide for more natural flow regimes in the Missouri River. This restoration should be in the form of increased spring discharge from upstream reservoirs, in particular the Tiber Dam (Lake Elwell) of the Marias river, and Canyon Ferry Lake.
6500	1996	Retain or expand existing Monument boundaries.
6500	1998	The Monument is illegal as proposed. 16 USC Section 1274 states that the amount of land cannot be more than 320 acres for each linear mile of the river segment.
6500	2010	The RMP should underscore the principle that the burden of proof is always on the proponent of an action that could impair or degrade the protective values for which the National Monument was created.
6500	2015	We request that our land not be included in the monument.
6500	2021	The BLM will look for opportunities to expand the boundaries where appropriate to protect the objects identified in the Proclamation.
6500	2026	It is imperative that the boundaries must be adjusted to delete this land from the monument and to allow the Evers Ranch to continue operation free of the impact caused by the current Monument boundary.
6500	2035	With the current proposed legislation to eliminate 80,000 acres of private land that lie within the monument boundary, provisions must be available to amend any RMP or EIS if such legislation is passed. This is an issue that will continue to be a major factor in this designation and possible alternatives should incorporate a potential boundary change.

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6500	2038	The purposeful inclusion of 81,000 acres of private property in the monument, targeted for acquisition by the BLM, is considered by many as an egregious violation of the Antiquities Act and represents a major bone of contention with local landowners. Receptiveness and cooperation amongst landowners in the monument area could be gained if the BLM were to work toward redefining the boundaries and removing the private property from the monument. (Even the Secretary of the Interior believes private land should not have been included in the monument.) The BLM's conscious decision to include specific tracts of private property in the monument without any coordination with landowners beforehand represents an ultimate betrayal of trust and will long be resented. The worn out litany that landowners accepted the inclusion of private land in the Wild and Scenic Missouri River is not true. Landowners did not like that designation but acquiesced to it because it was established lawfully by Congress and landowners at least had respect for that process. Furthermore, laws govern how wild and scenic rivers are managed -- unlike presidential proclamations that allow for areas to be managed at the discretion of the federal managing agency. I have made the foregoing comments because I believe the success of the Missouri Breaks Monument is predicated on how well the BLM addresses those issues. Resentment continues to run deep and landowners will not fade quietly into the night on this one.
6500	2042	Boundaries of the monument are so complex as to ensure that conflicts with adjacent or enclosed private owners will dominate any management scheme.
6500	2043	Headquarters management decision inappropriate at this time. How can you know where to manage from before you know how you're going to manage the monument. This should be put on review until the management plan is completed.
6500	10001	Since the issue of boundaries within the Upper Missouri Breaks Monument is an important one, I ask that the BLM ensure that the boundaries established by the proclamation remain intact.