

**Billings and Pompeys Pillar National
Monument**

**Resource Management Plan and
Environmental Impact Statement**

**Chapter 5: Consultation and
Coordination**

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Table of Contents

5	Consultation and Coordination.....	5-1
5.1	Introduction	5-1
5.2	Public Participation Opportunities	5-1
5.2.1	Scoping.....	5-2
5.2.2	Transportation Planning Workshops	5-3
5.3	Consultation and Coordination.....	5-3
5.3.1	Tribal Consultation.....	5-3
5.3.2	Tribal Consultation Responsibilities	5-4
5.3.3	U.S. Fish and Wildlife Service Consultation.....	5-5
5.3.4	State Historic Preservation Office Consultation.....	5-6
5.3.5	Resource Advisory Council.....	5-6
5.3.6	Cooperating Agencies	5-7
5.3.7	Informal Consultation and Coordination.....	5-8
5.4	Plan Distribution.....	5-9
5.5	Public Comment Period on the Draft RMP and EIS	5-16
5.5.1	Notification.....	5-17
5.5.2	Public Meetings	5-17
5.5.3	Comment Analysis	5-18
5.5.4	Comment Analysis Process	5-19
5.5.5	Summary of Public Comments: Personal Opinions/Preferences and Outside the Scope of this Document	5-20
5.5.6	BLM Review and Response to Comments.....	5-23
5.5.7	Other Public Involvement.....	5-35
5.5.8	List of Preparers	5-36
5.5.9	Responses to Public Comments.....	5-42

Table of Contents

Table 5-1 Federal, Tribal, State and Local Representatives Invited to Participate As Cooperating Agencies for the Billings and Pompeys Pillar National Monument RMP/EIS	5-9
Table 5-2: BLM Open House Meeting Locations – Draft RMP/EIS	5-17
Table 5-3: Issue Categories.....	5-18
Table 5-4: Commenter Index	5-25
Table 5-5 Billings and Pompeys Pillar National Monument RMP/EIS Preparers.....	5-37
Table 5-6 Montana State Office Reviewers	5-40
Table 5-7 Cooperating Agencies and Contacts	5-41
Table 5-8: BLM Response to Public Comments	5-42

5 Consultation and Coordination

5.1 Introduction

This chapter describes the public participation opportunities made available through the development of the Billings/Pompeys Pillar Draft Resource Management Plan and Environmental Impact Statement (RMP/EIS). This chapter also describes the consultation that occurred and collaborative efforts with various entities, including the State of Montana; the eight counties in the planning area; the Tribes; and the U.S. Fish and Wildlife Service. A distribution list included in this chapter identifies agencies, congressional staff, businesses and organizations that were sent a copy of the Draft RMP/EIS.

The Draft RMP/EIS was prepared by an interdisciplinary team of resource specialists, identified at the end of this chapter, from the Billings Field Office and Montana State Office. Technical review and support were provided by the field office, cooperators and the State of Montana.

Fifteen agencies, counties and tribal representatives participated in the development of the Draft RMP/EIS as cooperating agencies, including the Northern Cheyenne Tribe, the Bureau of Indian Affairs, the Bureau of Reclamation, Montana Fish, Wildlife and Parks, the Montana State Historic Preservation Officer, the Department of Natural Resources and Conservation (Northeastern Land Office and Southern Land Office), Montana Association of Counties, and the following Montana counties: Carbon County, Golden Valley County, Musselshell County, Wheatland County, Musselshell Planning Project, Yellowstone County, and Big Horn County, Wyoming. The Eastern Montana Resource Advisory Council also participated, and a discussion of their involvement is included later in this chapter.

Members of the interdisciplinary planning team have consulted formally and informally with numerous agencies, groups and individuals during the preparation of this document. Consultation, coordination and public involvement occurred as a result of scoping meetings, briefings and meetings with federal, state tribal and local government representatives, informal meetings and individual contacts.

5.2 Public Participation Opportunities

A number of opportunities were available in an effort to inform and involve the public about the planning process and participate in the development of the plan prior to release of the Draft RMP/EIS for public review and comment. A press release with regional distribution was issued at the start of the scoping and travel management meetings. In addition, a scoping package and a newsletter/update were distributed to the general mailing list and posted on the website. The scoping package announced the start of the planning process and informed the public of the various stages of the planning process and request comments and information. The first newsletter, distributed after the formal scoping period, provided the public with an update and progress of the planning process, as well as to announce the travel planning meetings. In addition to informing the public through newsletters/mailers, a website for the Billings/Pompeys Pillar RMP was launched to provide the public access to planning

documents, calendars, information on the planning process, as well as a photo gallery of the planning area. The website is continually updated to provide status reports and new information throughout the planning process.

The major public participation events are described in more detail below.

5.2.1 Scoping

The scoping process identifies land use issues, conflicts and opportunities. These issues may stem from new information or changed circumstances, the need to address environmental protection concerns, or a need to reassess the appropriate mix of allowable uses based on new information.

Scoping is the first stage of the planning process and closely involves the public with identifying issues, providing resource and other information, and developing planning criteria to guide preparation of the document. A Notice of Intent to prepare the Draft RMP/EIS was published in the Federal Register on May 15, 2008. This notice served as the beginning of BLM's formal scoping process. A news release was distributed to various media points on May 16, 2008, announcing the public the formal public scoping and comment period.

A scoping package for the Draft RMP/EIS was mailed in May 2008, to 1,205 individuals comprised of potential stakeholders, agencies, organizations and tribes. The newsletter introduced the BLM and the RMP planning process, and included a general description of the planning area. The scoping package also provided information regarding the preliminary planning issue themes, planning criteria, and project milestones timeline; and suggested methods for public involvement. The scoping package included a postage-paid self-mailer comment form was included in the newsletter to allow the public to easily submit their comments and/or information.

The BLM hosted seven public open houses during August 2008 to provide the public with opportunities to become involved in the process; learn about the project and planning process, meet the RMP team members and resource specialists, and to offer comments. A news release was issued to various media points on August 4, 2008, announcing the open houses. Fliers that included information about the BLM open house meetings were posted in local communities throughout the planning area. The open houses were held at the following locations: Pompeys Pillar National Monument; Bridger; Big Timber; Red Lodge; Lovell, Wyoming; Roundup; and Billings. The open house format allowed attendees to learn about the planning project and general information about the planning area, as well as provided a setting for the attendees to visit with resource specialists and submit comments. Fact sheets were made available to attendees, and included information about the planning process, preliminary planning issues and general information about the area. Site and resource maps and posters were displayed illustrating the current situation and management techniques practiced among different resources and land areas. A total of about 90 participants attended the open houses.

A total of 129 separate written submissions were received. Most written submissions included numerous comments; therefore the 129 submissions reflected a total of 575 separately-coded comments.

5.2.2 Transportation Planning Workshops

In addition to scoping, four travel planning workshops were held during June 2009. The workshops were held in Lovell, Wyoming; and in Bridger, Roundup and Billings, Montana. A news release was distributed to the media on May 18, 2009, announcing the workshops. A newsletter, distributed to 1,524 stakeholders, agencies and tribes, also announced the transportation workshops. A fact sheet was available at the workshops that provided information on travel management. The workshops provided the public an opportunity to review road and trail data on BLM public lands and to offer comments on the transportation network. A total of 39 individuals attended the transportation workshops.

5.3 Consultation and Coordination

5.3.1 Tribal Consultation

The laws requiring Native American consultation are as follows: National Historic Preservation Act, as amended, National Environmental Policy Act, American Indian Religious Freedom act, and Native American Graves Protection and Repatriation Act. The 1992 NHPA amendments place major emphasis on the role of Native American groups in the Section 106 review process. Subsequent revisions to the regulations of the ACHP published August 5, 2004, incorporate specific provisions for federal agencies to involve Native American groups in land or resource management decisions and for consulting with these groups throughout the process. Before making decisions or approving actions that could result in changes in land use, physical changes to lands or resources, changes in access or alienation of lands, federal managers must determine whether Native American interests would be affected, observe pertinent consultation requirements, and document how this was done. The consultation record is the federal agency's basis for demonstrating that the responsible manager has made a reasonable and good faith effort to obtain and consider appropriate Native American input in decision making.

General directions for Section 106 tribal consultation are as follows (also see BLM Handbook 8120):

- 1) The federal agency must consult with any Native American group that attaches religious and cultural significance to historic properties that may be affected by an undertaking regardless of location.
- 2) The agency must make a reasonable and good faith effort to identify Native American groups to be consulted.
- 3) The agency must be respectful of tribal sovereignty in conducting consultation.
- 4) The agency must recognize the government-to-government relationship.
- 5) Historic properties of religious and cultural significance may be located on ancestral, aboriginal, or ceded lands of Native Americans.

- 6) The Native American group may enter into agreement with the agency regarding any aspect of tribal participation in the Section 106 review process. The agreement may specify a tribe's geographic area of interest, types of projects about which they wish to be consulted, or provide the tribe with additional participation or concurrence in agency decisions under Section 106 provided that no modification is made to the roles of other parties without their consent.

The BLM acknowledges all Native American tribes that have historically and traditionally used land in the planning area and treats federally recognized tribes as sovereign nations. The BLM has initiated consultation with the Northern Cheyenne and Crow Tribes. An important component of this process is to continue to foster meaningful relationships with these tribes to understand and incorporate tribal culture, resources, needs, interests, and expectations into the RMP revision process.

5.3.2 Tribal Consultation Responsibilities

As a federal agency, the BLM is mandated to consult with American Indian tribes concerning the identification of cultural values, religious beliefs, and traditional practices of American Indian people, as well as other possible environmental and social concerns that may be affected by actions on federal lands. Tribal consultation is the active, affirmative process of: 1) identifying and seeking input from appropriate American Indian governing bodies, community groups, and individuals; and 2) considering their interests as a necessary and integral part of the BLM's decision making process. The aim of consultation is to involve affected American Indian groups in the identification of issues and the definition of the range of acceptable management options.

Tribal consultation includes the identification of places (i.e., physical locations) of cultural value to American Indian groups. Places that may be of cultural value include, but are not limited to, locations associated with the traditional beliefs concerning tribal origins, cultural history, or the nature of the world; locations where religious practitioners go, either in the past or the present, to perform ceremonial activities based on traditional cultural rules or practice; ancestral habitation sites; trails; burial sites; and places from which plants, animals, minerals, and waters possessing healing powers or used for other subsistence purposes, may be taken. Additionally, some of these locations may be considered sacred to particular American Indian individuals or tribes. Under the auspices of the American Indian Religious Freedom Act of 1978, Executive Order 13007, the Native American Graves Protection and Repatriation Act of 1990, and the National Historic Preservation Act, as amended, the BLM must take into account the effects of land use decisions on these types of locations. See Traditional Cultural Properties under Section 3.9, Cultural Resources, for a summary on tribal consultation conducted as part of the RMP/EIS process.

The BLM works in cooperation with American Indian tribes to coordinate and consult before making decisions or approving actions that could result in changes in land use, physical changes to lands or resources, changes in access, or alienation of lands. The Federal Land Policy and Management Act and the National Historic Preservation Act of 1966, as amended, require coordination with tribes in preparing and maintaining inventories of the public lands and determining their various resources and other values, developing and maintaining long-

range plans providing for the use of the public lands, and managing the public lands. Federal programs are required to be carried out in a manner sensitive to American Indian concerns and tribal government planning and resource management programs

In accordance with the National Historic Preservation Act and the recognition of the government-to-government relationship between tribes and the federal government, letters were sent to seventeen tribal governments and officials at the start of the planning process on March 25, 2008, to inform them of the Billings/Pompeys Pillar National Monument RMP/EIS and an opportunity to partner with the BLM as a cooperating agency. The letters also requested their input on issues and concerns to be considered during the planning process for the RMP/EIS. A second, follow-up letter was sent to the tribes on June 10, 2008. The Northern Cheyenne Tribe requested to serve in the capacity as a formal cooperating agency. While no other tribes became an official cooperating agency, coordination has continued through letters and updates (refer to Table 5-1). The opportunity for meetings and briefings will occur with the release of the RMP/EIS and will occur throughout the RMP process.

The coordination and consultation process was initiated with mail correspondence. Letters were posted describing the RMP/EIS process and soliciting input from the tribes and individuals. The letters also offered an invitation to meet with each tribe individually to clarify the RMP process as well as solicit concerns of tribal members. These letters were followed by a second letter again offering the same.

During development of the Alternatives, the seventeen tribes were sent copies of Chapter 2 for their review. All documents sent to the Cooperators throughout the planning process were also sent to the seventeen tribes requesting their review/comments.

5.3.3 U.S. Fish and Wildlife Service Consultation

Federal agencies are required to comply with the provisions of the Endangered Species Act of 1973, as amended. This includes a requirement to consult with the U.S. Fish and Wildlife Service (USFWS) on any action that may affect species listed as threatened and endangered or result in destruction or adverse modification of habitat designated as critical for listed species. In addition, federal agencies must confer with the USFWS on any action that is likely to jeopardize the continued existence of any species proposed to be listed or any action that may result in the destruction or adverse modification of critical habitat proposed to be designated for listed species.

This RMP/EIS is considered to be a major project and this document describes potential impacts to threatened and endangered species as a result of management actions proposed in the RMP. Contacts were made with the USFWS early in the planning process. An initial list of federally listed threatened or endangered plant, animals, or fish species or habitats present in the Billings Field Office planning area was requested in May 29, 2008, with additional follow-up in November 2009. On January 11, 2010, the USFWS provided input for the RMP/EIS on species that are currently listed as threatened, endangered, proposed, or candidates for protection under the Endangered Species Act, as well as input on migratory birds. There are two federally listed threatened wildlife species and two endangered species that either occur in the planning area or use habitat found within the planning area. These include: black-footed

ferret (endangered/non-essential experimental population), grizzly bear (threatened), Canada lynx (threatened/non-essential experimental population), and whooping crane (endangered).

While the USFWS declined to serve as a formal cooperating agency during the planning process at the local level, informal meetings were held with the USFWS to discuss issues and alternatives. The USFWS, as a reviewing agency, was provided the opportunity to review and provide comments on the draft Chapter 2 Range of Alternatives in March 2011 as well as the draft RMP/EIS in August 2011. In March 2012, the USFWS became a cooperating agency on a national level with the BLM to address Greater Sage-Grouse conservation in RMP amendments and RMP revisions bureau-wide. February 2012, managers and specialists from Montana/Dakotas BLM conducted a sage-grouse coordination meeting with Montana representatives of USFWS and Montana Fish, Wildlife and Parks. March 2012, Montana/Dakotas BLM briefed representatives from each Montana Fish, Wildlife, and Parks regional offices and USFWS representatives on the Implications and Implementation of the National Sage-grouse Planning Strategy. Also in March 2012, the BLM Montana/Dakotas State Director met with the DOI Solicitor, USFWS and USFS to discuss Sage-grouse issues/concerns in BLM RMP amendments and revisions. The Regional Sage-grouse Management Team will meet in April 2012. Consultation with the USFWS will continue throughout the RMP process.

A draft biological assessment evaluating the impacts of the preferred alternative on federal threatened and endangered species will be submitted to the USFWS concurrently with the public release of this document. The proposed RMP/Final EIS will include the final biological assessment and resulting USFWS biological opinion.

5.3.4 State Historic Preservation Office Consultation

The BLM cultural resource management program operates in accordance with 36 CFR Part 800, which provides specific procedures for consultation between the BLM and the State Historic Preservation Office (SHPO). The SHPO participated as a cooperating agency for the RMP. The SHPO was consulted during the development of the Draft RMP/EIS concerning cultural resources that may be affected and was included on the RMP mailing list throughout scoping and public involvement.

5.3.5 Resource Advisory Council

Resource Advisory Councils (RACs) were created in 1995 to advise the BLM on land management programs and issues. The RAC consists of a 15-member advisory group who represent three broad interest categories: commodity interests, non-commodity interests, and government/academic interests. The RAC members are chosen by the Secretary of Interior in consultation with the governor of the state in which they serve. One of the strengths of the RAC is their ability to provide assistance and input on a wide variety of land use issues.

The Eastern Montana Resource Advisory Council (RAC) was actively involved in the Billings/Pompeys Pillar Draft RMP/EIS planning process. The first meeting with the RAC on the Billings/Pompeys Pillar RMP was held on May 21, 2008. A presentation on the RMP

process was provided, highlighting the components and issues of the planning area, preliminary planning criteria and project status.

Early on in the process, the RAC identified two members to serve as liaisons to the RMP and regularly attended RMP team meetings to provide input and feedback. In an effort to help BLM develop management alternatives for transportation planning and special designations and to foster a collaborative planning environment, the RAC formed two sub-committees: Travel Management and Special Designations. These two RAC sub-committees had representatives from each of the three interest categories (defined above) to provide balanced representation. The RAC sub-committees and the BLM worked together to develop management goals and objectives, review data, and provide feedback on management options and alternatives. The entire RAC, as well as the RAC-appointed sub-committees, continued to be involved in the planning process during the preparation of the Draft RMP/EIS, through briefings and updates.

5.3.6 Cooperating Agencies

A cooperating agency is any federal, state, or local government agency or Native American tribe that enters into an agreement with the lead federal agency to assist in the development of an environmental analysis. On March 10, 2008, the BLM mailed letters to the federal, tribal, state and local representatives shown in Table 5-1, inviting them to participate as cooperating agencies for the Billings/Pompeys Pillar RMP. A follow-up letter was sent in early May, 2008, requesting participation in the planning process.

Of the forty-three agencies and tribes invited to participate as cooperating agencies, fifteen accepted the invitation to participate, including the: Northern Cheyenne Tribal Council, Bureau of Indian Affairs, Rocky Mountain Region; Bureau of Reclamation, Montana Area Office; State Historic Preservation Office (Montana); Department of Natural Resources and Conservation – Northeastern and Southern Land Offices; Montana Association of Conservation Districts; Montana Fish, Wildlife and Parks; Carbon county; Golden Valley county; Musselshell county; Musselshell Planning Project (a consortium of counties in the planning area); Wheatland county; Yellowstone county; and Big Horn county (Wyoming). Some of the agencies and tribes that declined to serve as participating agencies, as well as those agencies or tribes that did not respond, will continue to be involved and informed throughout the planning process through mailings and project status updates. Early in the process, the cooperating agency representatives were included in all RMP team status updates and RMP team planning meetings. Twelve cooperating agency representatives attended RMP team meetings in 2008 and early 2009. A formal planning process/status update was mailed to cooperating agencies in December, 2008, and included the Scoping Report. After development of management goals and objectives for alternative formulation, the cooperating agency representatives indicated an interest in being involved and updated at major milestones of the planning process. On March 15, 2011, the cooperating agencies were mailed the Billings/Pompeys Pillar National Monument RMP draft Chapter 2, including the preliminary management alternatives. A meeting was held on March 29, 2011 to discuss the alternatives, review cooperator comments, and review the status of the planning process. No response was received and no cooperating agencies participated in the meeting, so a follow-up letter was sent on March 30, 2011. No response or comments were received as a result of the follow-up letter.

A copy of the Draft RMP/EIS was mailed to the cooperating agencies and tribes on August 10, 2011. A cooperators meeting was held on August 30, 2011 to review cooperator comments. One cooperating agency participated in the August 30 meeting and comments were received from one additional agency.

The BLM is aware that there are specific State laws and local plans relevant to aspects of public land management that are discrete from, and independent of, Federal law. However, BLM is bound by Federal law. As a consequence, there may be inconsistencies that cannot be reconciled. The FLPMA and its implementing regulations require that BLM's land use plans be consistent with State and local plans only if those plans are consistent with the purposes, policies, and programs of federal laws and regulations applicable to public lands. Where State and local plans conflict with the purposes, policies, and programs of Federal law there will be an inconsistency that cannot be resolved. While County and Federal planning processes, under FLPMA, are required to as integrated and consistent as practical, the Federal agency planning process is not bound by or subject to County plans, planning processes, or planning stipulations.

5.3.7 Informal Consultation and Coordination

On January 13, 2009, the BLM hosted an economic workshop in Billings to inform stakeholders how BLM land uses influence local and regional economic activity. Twenty-three individuals representing various federal, state and local agencies and organizations attended the workshop. Economists from the Montana BLM and the U.S. Forest Service (teams enterprise) presented economic information and led group discussions to promote a better understanding of how the economic analysis is integrated into the RMP process and gain local insights about local economies and feedback on the process from stakeholders.

The BLM has conducted less formal coordination and consultation with various entities throughout the development of the Draft RMP/EIS. As directed by the Watershed Protection and Flood Prevention Act and the Clean Water Act, the BLM has included the U.S. Environmental Protection Agency, Montana Department of Environmental Quality, and Natural Resource Conservation Service in scoping activities, and updates of the planning process in the RMP newsletter. Permit holders, including livestock grazing permittees and lessees, and other stakeholders, have been included in public scoping efforts and mailings.

On February 22, 2012, BLM hosted a conference call concerning the Billings RMP/EIS air quality impact analysis with an Air Quality Technical Workgroup consisting of representatives from the EPA, USFS, FWS, and NPS. This call formally initiated collaborative planning and review activities under the *Memorandum of Understanding Among the U.S. Department of Agriculture, U.S. Department of Interior, and U.S. Environmental Protection Agency, Regarding Air Quality Analysis and Mitigation for Federal Oil and Gas Decisions Through the National Environmental Policy Act Process*. During the February 22, 2012 call, BLM presented background information on existing air quality within the BiFO, predicted oil and gas activities, estimated emissions associated with the RFD, and a proposed air quality analysis approach for the BiFO RMP revision. BLM solicited comments from each of the MOU agencies and will continue to coordinate with these agencies throughout the development process for the BiFO RMP revision.

Table 5-1 Federal, Tribal, State and Local Representatives Invited to Participate As Cooperating Agencies for the Billings and Pompeys Pillar National Monument RMP/EIS

Crow Tribal Council	Bureau of Reclamation – Montana Area Office
Northern Cheyenne Tribal Council	National Park Service – Big Horn Canyon National Recreation Area
Arapahoe Business Council	Custer National Forest
Shoshone Business Committee	Gallatin National Forest – Big Timber District
Oglala Sioux Tribal Council	State Historic Preservation Office
Rosebud Sioux Tribal Council	Natural Resource Conservation Service
Spirit Lake Tribal Council	Montana Department of Environmental Quality
Standing Rock Sioux Tribal Council	State Department of Agriculture
Blackfeet Tribal Business Council	Montana Association of Conservation Districts
Cheyenne River Sioux Tribe	Montana Fish, Wildlife and Parks
Pine Ridge - Natural Resources Office	Dept. of Natural Resources and Conservation – Northeastern Land Office
Lower Brule Sioux Tribal Council	Dept. of Natural Resources and Conservation – Southern Land Office
Fort Peck Tribal Executive Board	Big Horn County (Montana)
Fort Belknap Community Council	Carbon County
Chippewa Cree Business Committee	Golden Valley
Three Affiliated Tribes Business Council	Stillwater County
Turtle Mountain Band of Chippewa	Sweet Grass County
Big Horn County - Wyoming	Wheatland County
Wyoming Game and Fish, Cody Region Office	Yellowstone County
U.S. Fish and Wildlife Service	Musselshell County
Bureau of Indian Affairs, Rocky Mountain Region	Musselshell Planning Project (consortium of counties in the planning area)
Environmental Protection Agency – Region 8	

5.4 Plan Distribution

Since initial scoping, the BLM has maintained a mailing list of individuals, businesses, organizations, and federal, state, tribal and local government representatives interested in the development of the Billings/Pompeys Pillar Draft RMP/EIS. In an effort to reduce printing costs, notices were mailed to everyone on the RMP mailing list in January 2012, requesting confirmation of their preference to remain on or be deleted from the mailing list, along with options for viewing the Draft RMP/EIS.

The Draft RMP/EIS is available on the BLM web site at:
http://www.blm.gov/mt/st/en/fo/billings_field_office/rmp.html The Draft RMP/EIS is available for public review at the following locations:

- **BLM Offices:**
 - ▶ Billings Field Office
 - ▶ Butte Field Office
 - ▶ Lewistown Field Office
 - ▶ Miles City Field Office
 - ▶ Montana State Office
 - ▶ Cody Field Office (Wyoming)
 - ▶ Worland Field Office (Wyoming)
 - ▶ Wyoming State Office

- **U.S. Forest Service Offices:**
 - ▶ Custer National Forest – Supervisor’s Office
 - ▶ Custer National Forest – Beartooth Ranger District
 - ▶ Gallatin National Forest – Supervisor’s Office
 - ▶ Gallatin National Forest – Yellowstone District (Big Timber)
 - ▶ Helena National Forest – Supervisor’s Office
 - ▶ Lewis and Clark National Forest – Supervisor’s Office
 - ▶ Lewis and Clark National Forest – Musselshell Ranger District

- **Public Libraries;**
 - ▶ Big Horn County Public Library (Hardin)
 - ▶ Big Timber Carnegie Public Library
 - ▶ Billings Public Library
 - ▶ Bozeman Public Library
 - ▶ Bridger Public Library
 - ▶ Harlowton Public Library
 - ▶ Laurel Public Library
 - ▶ Red Lodge Carnegie Library
 - ▶ Roundup Community Library
 - ▶ Stillwater County Library (Columbus)
 - ▶ Big Horn County Library - Lovell Branch (Wyoming)
 - ▶ Park County Library – Cody (Wyoming)

Printed copies of the Draft RMP/EIS have been distributed to the agencies, tribal entities, organizations, and businesses listed below. The Draft RMP/ EIS, either on CD or in printed format was also mailed to individuals who requested a copy.

- **Federal Government**
 - ▶ U.S. Army Corps of Engineers - Omaha District,
 - ▶ U.S. Army Corps of Engineers – Missoula Regulatory Office

- ▶ U.S. Army Corps of Engineers – Billings Regulatory Office
- ▶ U.S. Army Corps of Engineers – Helena Regulatory Office
- ▶ U.S. Dept Energy - Office of Environmental Management
- ▶ U.S. Dept Energy – Western Area Power Administration
- ▶ U.S. Environmental Protection Agency – Region 8
- ▶ U.S. Fish and Wildlife Service
- ▶ U.S. Geological Survey
- ▶ USDA Farm Service Agency
- ▶ USDA Forest Service
- ▶ USDA Natural Resources Conservation Service – Big Timber Field Office
- ▶ USDA Natural Resources Conservation Service – Columbus Field Office
- ▶ USDA Natural Resources Conservation Service – Bozeman Field Office
- ▶ USDA Natural Resources Conservation Service – Joliet Field Office
- ▶ USDA Natural Resources Conservation Service – Hardin Field Office
- ▶ USDA Natural Resources Conservation Service – Bridger Plant Center
- ▶ USDA Natural Resources Conservation Service – Crow Agency Field Office
- ▶ USDI Bureau of Indian Affairs
- ▶ USDI Bureau of Reclamation
- ▶ USDI Field Solicitor’s Office
- ▶ USDI National Park Service
- ▶ USDI National Park Service – National Historic Landmarks
- ▶ USDI National Park Service – Lewis and Clark National Historic Trail
- ▶ USDI National Park Service – Big Horn Canyon NRA
- ▶ USFS Nez Perce National Historic Trail
- **State Government**
 - ▶ Rep. Duane Ankney – House District 43
 - ▶ Rep. Tom Berry – House District 45
 - ▶ Rep. Joanne Blyton – House District 59
 - ▶ Rep. Virginia Court – House District 52
 - ▶ Rep. Clayton Fiscus – House District 45
 - ▶ Rep. Wylie Galt - House District 83
 - ▶ Rep. Dave Hagstrom - House District 53
 - ▶ Rep. David Howard - House District 60
 - ▶ Rep. Donald Jones - House District 56
 - ▶ Rep. Krayton Kerns - House District 58
 - ▶ Rep. Sarah Laszloffy - House District 57
 - ▶ Rep. Dennis Lenz - House District 50
 - ▶ Rep. Margaret MacDonald - House District 54
 - ▶ Rep. Kelly McCarthy - House District 51
 - ▶ Rep. Mary McNally - House District 49

- ▶ Rep. Jonathan McNiven - House District 44
- ▶ Rep. Carolyn Pease-Lopez - House District 42
- ▶ Rep. Patricia Peppers - House District 41
- ▶ Rep. Alan Redfield - House District 61
- ▶ Rep. Cary Smith - House District 55
- ▶ Rep. Daniel Zolnikov - House District 47
- ▶ Rep. Douglas Kary - House District 48
- ▶ Senator Elsie Arntzen – Senate District 27
- ▶ Senator Ron Arthun – Senate District 31
- ▶ Senator Taylor Brown – Senate District 22
- ▶ Senator Robyn Driscoll – Senate District 26
- ▶ Senator Jeff Essmann – Senate District 28
- ▶ Senator Dave Lewis - Senate District 42
- ▶ Senator Alan Olson - Senate District 23
- ▶ Senator Jason Priest - Senate District 30
- ▶ Senator Sharon Steward-Peregoy - Senate District 21
- ▶ Senator Kendall Van Dyk - Senate District 25
- ▶ Senator Edward Walker - Senate District 29
- ▶ Senator Roger Webb - Senate District 24
- ▶ State of Montana, Office of the Governor – Tim Baker
- ▶ Montana DEQ – Air Resource Management Bureau – Dave Klemp
- ▶ Montana DEQ – Air Resource Management Bureau – Vickie Walsh
- ▶ Montana DEQ – Bonnie Lovelace
- ▶ Montana DEQ
- ▶ Montana DEQ – Watershed Protection Section – Mark Ockey
- ▶ Montana Dept of Natural Resources & Conservation – SLO – Matt Wolcott
- ▶ Montana Dept of Natural Resources & Conservation – NeLO – Barny Smith
- ▶ Montana Department of State Lands
- ▶ Montana Department of Transportation – Stefan Streeter
- ▶ Montana Department of Transportation – Mike Tierney
- ▶ Montana Highway Commission
- ▶ Montana Fish, Wildlife, and Parks (Helena) – Jeff Hagener
- ▶ Montana Fish, Wildlife, and Parks (Helena) – Joe Maurier
- ▶ Montana Fish, Wildlife, and Parks (Helena) – Catherine Wightman
- ▶ Montana Fish, Wildlife, and Parks (Helena) – Rob Brooks
- ▶ Montana Fish, Wildlife, and Parks (region 5) – Kevin Holland
- ▶ Montana Fish, Wildlife, and Parks (region 5) – Ray Mule’
- ▶ Montana Fish, Wildlife, and Parks (region 5) – Jay Newell
- ▶ Montana Fish, Wildlife, and Parks (region 5) – Monty Paugh
- ▶ Montana Fish, Wildlife, and Parks (region 5) – Doug Haberman
- ▶ Montana Office of Indian Affairs – Lesa Evers

- ▶ Montana State Historic Preservation Office – Dr. Mark Baumler
- ▶ Montana State Historic Preservation Office – Dr. Stan Wilmoth
- ▶ South Dakota DENR Air Quality Program – Brian Gustafson
- ▶ Wyoming Game and Fish Department (Cody Office) -
- ▶ Wyoming Game and Fish Department – Kevin Hurly
- ▶ Wyoming Game and Fish Department – Bill Wichers
- ▶ Wyoming Historic Preservation Office – Mary Hopkins
- **County/Local Government**
 - ▶ Big Horn County (MT) Commissioners
 - ▶ Big Horn (MT) Conservation District – Gloria Menke
 - ▶ Big Horn County (WY) Commissioners
 - ▶ Big Horn County (WY) Economic Development Inc. – Barbara Anne Green
 - ▶ Big Horn County (WY) Weed and Pest Control – Ruth Richards
 - ▶ Carbon County Commissioners
 - ▶ Carbon County Commissioners – Doug Tucker
 - ▶ Carbon County Historic Preservation Officer – Debra Hronek
 - ▶ Carbon County Planning – Greg McGann
 - ▶ Carbon County Resource Council
 - ▶ Carbon County Weed Department – Brian Ostwald
 - ▶ Carbon Conservation District – Penny Landon
 - ▶ Fergus Conservation District – Shonny Nordlund
 - ▶ Gallatin Conservation District – Marcie Murnion-Learn
 - ▶ Golden Valley Commissioners
 - ▶ Musselshell County
 - ▶ Musselshell County Commissioners
 - ▶ Musselshell County – Bryan Adolph
 - ▶ Musselshell County – Larry Lekse
 - ▶ Musselshell County Planning Board – Tom Berry
 - ▶ Musselshell County Planning Board – Alan Churchill
 - ▶ Musselshell County Weed Department – Carol Martin
 - ▶ Lower Musselshell Conservation District – Alice Wolff
 - ▶ Upper Musselshell Conservation District – Cheryl Miller
 - ▶ Phillips County Commissioners
 - ▶ Prairie County Board of Commissioners – Todd Devlin
 - ▶ Stillwater County
 - ▶ Stillwater County Commissioners
 - ▶ Stillwater County Weed District
 - ▶ Stillwater Conservation District – Barbara Berry
 - ▶ Sweet Grass County Commissioners
 - ▶ Sweet Grass County Planning Department – Page Dringham

- ▶ Sweet Grass County Weed Program – Stacey Barta
- ▶ Sweet Grass Conservation District – Guelda Halverson
- ▶ Yellowstone County
- ▶ Yellowstone County Commissioners
- ▶ Yellowstone County Public Works Dept – Timothy Miller
- ▶ Yellowstone County Weed Department – Scott Bockness
- ▶ Yellowstone Conservation District – Laverne Ivie
- ▶ Montana Association of Conservation Districts – Jeff Tiberi
- ▶ Billings Chamber of Commerce – John Brewer
- ▶ Billings Chamber of Commerce – Bruce McIntyre
- ▶ Billings Parks and Recreation – Mike Whitacker
- ▶ Billings Chamber of Commerce – Executive Director
- ▶ Billings City/County Planning – Dave Green
- ▶ Billings City/County Planning – Karen Miller
- ▶ City of Billings Planning Department – Wyeth Friday
- ▶ City of Billings – Tina Volek
- ▶ City of Billings – City/County Planning Department
- ▶ City of Billings – Mayor
- ▶ City of Billings – Trails
- ▶ City of Billings & Yellowstone County (Planning) – Candi Beaudry
- ▶ Big Sky Economic Development Council – Patty Nordlund
- ▶ City of Laurel – James Caniglia
- ▶ City of Lovell, Wyoming – Mayor
- ▶ City of Red Lodge – Lindsay Johnson
- ▶ City of Cody, WY – Kathaleen Spencer
- ▶ Harlowton Area Chamber of Commerce
- ▶ Park County, WY
- ▶ Red Lodge Chamber of Commerce
- ▶ Stillwater Economic Development Coordinator – Marissa Hauge
- ▶ Sweet Grass Chamber of Commerce
- ▶ Central Montana RC&D/Central Montana Regional Water Authority – Monty Sealy
- ▶ Absarokee Rural Fire District
- ▶ Bear Creek Fire Department
- ▶ Big Horn County (MT) Rural Fire Department
- ▶ Big Timber Volunteer Fire Department
- ▶ Billings Fire Department
- ▶ Billings Logan International Fire Department
- ▶ Blue Creek Volunteer Fire Department
- ▶ Bridger Volunteer Fire Department
- ▶ Broadview Volunteer Fire Department

- ▶ Bull Mountain Volunteer Fire Association
- ▶ Clyde Park Rural Volunteer Fire Department
- ▶ Columbus Rural Fire Department
- ▶ Cook City-Silvergate Fire Department
- ▶ Crow Agency Volunteer Fire Department
- ▶ Dean Creek Volunteer Fire Department
- ▶ Dodson People's Creek Department
- ▶ Fromberg Volunteer Fire Department
- ▶ Gardiner Volunteer Fire Department
- ▶ Golden Valley County Fire
- ▶ Haley Bench Volunteer Fire Department – Huntley
- ▶ Harlowton Volunteer Fire Department
- ▶ Hawk Creek Volunteer Fire Department
- ▶ Homewood Park Volunteer Fire Department
- ▶ Joliet Rural and Volunteer Fire Department
- ▶ Judith Gap Volunteer Fire Department
- ▶ Molt Volunteer Fire Department
- ▶ Laurel Volunteer Fire Department
- ▶ Lavina Volunteer Fire Department
- ▶ Livingston Fire Department
- ▶ Lockwood Fire District 8
- ▶ Lodge Grass Volunteer Fire Department
- ▶ Malta Volunteer Fire Department
- ▶ Melstone Volunteer Fire Department
- ▶ Nye Volunteer Fire Company
- ▶ Paradise Valley FSA
- ▶ Park City Rural Fire District
- ▶ Park County Rural Fire #1
- ▶ Phillips County Volunteer Fire Department
- ▶ Rapelje Volunteer Fire Company
- ▶ Red Lodge Fire Department
- ▶ Red Lodge Rural Fire District
- ▶ Reed Point Volunteer Fire Company
- ▶ Roberts Rural Fire District 6
- ▶ Roundup Volunteer Fire Department
- ▶ Ryegate Volunteer Fire Department
- ▶ Saco Volunteer Fire Department
- ▶ Shawmut Volunteer Fire Department
- ▶ Shepherd Volunteer Fire Department
- ▶ Stillwater County Fire
- ▶ Twodot Volunteer Fire Department

- ▶ Wheatland County Volunteer Fire Department
- ▶ Wilsall Volunteer Fire Department
- ▶ Winnett Volunteer Fire Department
- ▶ Worden/HBPP Volunteer Fire Department
- **Tribal Government**
 - ▶ Arapahoe Business Council
 - ▶ Blackfeet Tribal Business Council
 - ▶ Chippewa Cree Business Committee
 - ▶ Cheyenne River Sioux Tribe Reservation
 - ▶ Confederated Tribes of the Colville Reservation – THPO
 - ▶ Confederated Tribes of the Colville Reservation – Chairman
 - ▶ Confederated Tribes of the Umatilla Indian Reservation – THPO
 - ▶ Crow Tribal Council
 - ▶ Crow Tribe – THPO
 - ▶ Fort Peck Tribal Council
 - ▶ Lower Brule Sioux Tribal Council
 - ▶ Nez Perce Tribe – THPO
 - ▶ Nez Perce Tribe – Chairman
 - ▶ Northern Cheyenne Tribe – THPO
 - ▶ Oglala Sioux Tribal Council
 - ▶ Rosebud Sioux Tribal Council
 - ▶ Shoshone Business Committee
 - ▶ Spirit Lake Tribal Council
 - ▶ Standing Rock Sioux Tribal Council
 - ▶ Three Affiliated Tribes Business Council
 - ▶ Turtle Mountain Band of Chippewa
- **Congressional**
 - ▶ Congressman Ryan Zinke
 - ▶ Senator Max Baucus (ret)
 - ▶ Senator Steve Daines
 - ▶ Senator John Tester

5.5 Public Comment Period on the Draft RMP and EIS

A notice of availability announcing the release of the Draft RMP/EIS was published in the Federal Register on March 29, 2013, initiating a 90-day public comment period. The public comment period ended on June 29, 2013. During the 90-day public comment period, the public was provided the opportunity to review and comment on the Draft RMP/EIS.

5.5.1 Notification

The BLM issued a news release on March 29, 2013, announcing the release of the Draft RMP/EIS, which provided the dates and times of the public commenting workshops. The BLM also distributed a newsletter via U.S. mail and e-mail to individuals on the BLM mailing list, which provided the dates and locations to who all commented at workshops and public meetings. In addition to news releases and other notifications from the BLM regarding the comment period, some members of the public received notification from other sources. Several articles and news bulletins regarding the release of the Draft RMP/EIS were published in local newspapers. Many of the articles listed the dates for the public meetings and workshops. The Draft RMP/EIS was posted on the RMP website, hard copies were sent to Cooperating Agencies, other federal agencies in the planning area, libraries in the planning area, RAC members, local and state senators/representatives, and to tribes with affinity to the planning area, electronic copies of the document were distributed to the RMP mailing list, and additional hard-copies available upon request.

5.5.2 Public Meetings

During the public comment period, the BLM, Billings Field Office held six open house workshops in April/May of 2013 in towns and cities throughout the planning area (Table 5-2). The commenting workshops were offered to inform readers about how to navigate the Draft RMP/EIS, and how to prepare and submit substantive comments. The public meetings also provided additional opportunity for the public to ask questions and submit comments. BLM managers, resource specialists, and other representatives of the BLM were present during these meetings to discuss and answer questions. News releases were released to local newspapers announcing the Open House format meetings.

Table 5-2: BLM Open House Meeting Locations - Draft RMP/EIS

Community	Location	Date	Time	Attendance
Bridger	Bridger Senior Center /Golden Age Society 118 C Street	April 30, 2013	7-9 pm	17
Big Timber	Carnegie Public Library / Community Room 314 McLeod Street	May 1, 2013	7-9 pm	9
Red Lodge	Senior Center 207 S. Villard Avenue	May 2, 2013	7-9 pm	21
Roundup	Emergency Service Building Ambulance Barn 704 1 st St. East	May 6, 2013	7-9 pm	6
Lovell, WY	Big Horn Canyon National Recreation Area Visitor Center 20 Highway 14A East	May 7, 2013	7-9 pm	23
Billings	Hampton Inn (Lewis Room) 5110 Southgate Drive	May 8, 2013	7-9 pm	116

5.5.3 Comment Analysis

The BLM received written comments by mail, e-mail, fax, and submitted/hand-delivered at the public meetings. Comments covered a wide spectrum of thoughts, opinions, ideas and concerns. BLM recognizes that commenters invested considerable time and effort to submit comments on the Draft RMP/EIS, and therefore, developed a comment analysis methodology to ensure that all comments were considered as directed by NEPA regulations.

According to NEPA, BLM is required to identify and formally respond to all substantive public comments. BLM developed a systematic process for responding to comments to ensure all substantive comments were tracked and considered. Upon receipt, each comment letter was assigned an identification number and logged into CommentWorks, a database that allowed the BLM to organize, categorize, and respond to comments. Substantive comments from each letter were coded to appropriate categories (Table 5-3) based on content of the comment, retaining the link to the commenter. The categories generally follow the sections presented in the Draft RMP/EIS, though some relate to the planning process or editorial concerns.

Table 5-3: Issue Categories

Category
Edits
Planning Issues and Criteria
NEPA
FLPMA
National Sage Grouse Strategy
Natural, Biological, and Cultural Resources
Air
Climate Change
Geology
Soil
Water
Vegetation (Forests and Woodlands, Rangelands and Shrublands, Riparian and Wetlands, Invasive Species and Noxious Weeds, Special Status Plants)
Wildlife Habitat and Special Status Species
Fisheries Habitat and Special Status Species
Wild Horses
Cultural and Heritage Resources
Paleontological Resources
Visual Resources
Fire Ecology and Management
Wilderness Characteristics
Resource Uses
Energy and Mineral Resources
Locatable Minerals
Realty, Cadastral Survey, and Lands

Livestock Grazing
Recreation and Visitor Services
Trails and Travel Management
Renewable Energy
Transportation and Facilities
Special Designations
Pompeys Pillar National Monument and ACEC
ACECs
Wild and Scenic Rivers
Pryor Mountain Wild Horse Range
National Historic Trails
Social and Economic Conditions / Environmental Justice
American Indian Tribes
Economic Conditions

5.5.4 Comment Analysis Process

Although each comment letter was diligently considered, the comment analysis process involved determining whether a comment was substantive or non-substantive in nature. In performing this analysis, BLM relied on the CEQ's regulations to determine what constituted a substantive comment.

A substantive comment does one or more of the following:

- Questions, with a reasonable basis, the accuracy of the information and/or analysis in the EIS;
- Questions, with a reasonable basis, the adequacy of the information and/or analysis in the EIS;
- Presents reasonable alternatives other than those presented in the Draft EIS that meet the purpose and need of the proposed action and addresses significant issues;
- Questions, with a reasonable basis, the merits of an alternative or alternatives;
- Causes changes in or revisions to the proposed action; and
- Questions, with a reasonable basis, the adequacy of the planning process itself.

Additionally, BLM's NEPA handbook identifies the following types of substantive comments:

- Comments on the Adequacy of the Analysis: Comments that express a professional disagreement with the conclusions of the analysis or assert that the analysis is inadequate are substantive in nature but may or may not lead to changes in the Proposed RMP/Final EIS. Interpretations of analyses should be based on professional expertise. Where there is disagreement within a professional discipline, a careful review of the various interpretations is warranted. In some cases, public comments may necessitate a reevaluation of analytical conclusions. If, after reevaluation, the manager responsible for preparing the EIS (authorized officer [AO]) does not think that a change is warranted, the response should provide the rationale for that conclusion.

- **Comments That Identify New Impacts, Alternatives, or Mitigation Measures:** Public comments on a draft EIS that identify impacts, alternatives, or mitigation measures that were not addressed in the draft are substantive. This type of comment requires the AO to determine whether it warrants further consideration. If it does, the AO must determine whether the new impacts, new alternatives, or new mitigation measures should be analyzed in the Final EIS, a supplement to the Draft EIS, or a completely revised and recirculated Draft EIS.
- **Disagreements with Significance Determinations:** Comments that directly or indirectly question, with a reasonable basis, determinations regarding the significance or severity of impacts are substantive. A reevaluation of these determinations may be warranted and may lead to changes in the Final EIS. If, after reevaluation, the AO does not think that a change is warranted, the response should provide the rationale for that conclusion.

Comments that failed to meet the above description were considered non-substantive. Many comments received throughout the process expressed personal opinions or preferences, had little relevance to the adequacy or accuracy of the Draft RMP/EIS, or represented commentary regarding resource management without any real connection to the document being reviewed. These comments did not provide specific information to assist the planning team in making a change to the Preferred Alternative, did not suggest other alternatives, and did not take issue with methods used in the Draft RMP/EIS, and are not addressed further in this document.

Opinions, feelings, and preferences for one element or one alternative over another, and comments of a personal and/or philosophical nature were all read, analyzed, and considered, but because such comments are not substantive in nature, BLM did not respond to them. It is also important to note that while all comments were reviewed and considered; comments were not counted as “votes.” The NEPA public comment period is neither considered an election nor does it result in a representative sampling of the population. Therefore, public comments are not appropriate to be used as a democratic decision-making tool or as a scientific sampling mechanism.

5.5.5 Summary of Public Comments: Personal Opinions/Preferences and Outside the Scope of this Document

This section provides a summary of those expressions of personal opinion/preference or comments that were outside the scope of the Billings and Pompeys Pillar National Monument RMP/EIS.

Cultural Resources

- Requests for several sites along the Nez Perce NHT (not located on BLM managed public land) to be protected and nominated to the National Register.
- Requests for additional protection (beyond the ACEC) for Weatherman Draw ACEC

Fire Ecology and Management

- Disagreement with proposed fire suppression tactics, suggests lawsuits against BLM

Fisheries Habitat

- Statements requesting increased protections for Blue and Red Ribbon streams

Federal Land Policy and Management Act

- Thought the DRMP did not meet the requirement of the Federal Land Policy and Management Act (FLPMA).
- Stated that BLM is not meeting its multiple use mandate.
- Oil and gas (and other mineral development) is a crucial part of the BLM's multiple use mandate

Fluid Minerals

- Thought oil and gas activity should be more carefully restricted.
- Felt that specific areas should be closed to oil and gas development
- Felt that the practice of hydraulic fracturing warranted more regulation
- Stated that the Preferred Alternative would further limit use, including industrial uses such as electric and gas distribution and transmission lines on BLM administered lands in the planning area.

Realty, Cadastral Survey, and Lands

- Requests for certain lands be available for disposal
- Opinions for and against exclusion and avoidance areas for resource management
- Thought that the restrictions placed on new energy infrastructure and facilities would potentially increase costs for industry and ultimately consumers

Lands with Wilderness Characteristics

- Requests for certain areas (Weatherman Draw, Castle Coulee, etc.) to be considered as containing wilderness characteristics

Livestock Grazing

- Requested grazing be modified or eliminated
- Felt riparian areas not adequately protected from livestock grazing
- Stated that there was not an adequate range of alternatives for livestock grazing (no reduction/elimination)

National Environmental Policy Act

- Requested environmental reviews should BLM change WEMs (Waivers, Exceptions, or Modifications) on oil and gas stipulations
- Stated that the NEPA process and DRMP should carefully consider and incorporate the best available science on climate change, and impacts to wildlife species
- Did not feel that the DRMP provides the balanced land management required by law
- Did not support any of the alternatives as drafted
- Received requests to extend the public comment period an additional 45-120 days

- Disliked Open House format meetings held for DRMP comments, requested that BLM hold public hearings instead
- Stated BLM failed to comply with various Acts, laws, and regulations,

Recreation and Visitor Use

- Requests supporting target shooting closures and suggesting additional closures
- Statements against target shooting closures, stating BLM did not document why closures were proposed
- Recreation section lacking in accuracy with regards to how people have historically accessed these lands for the activities listed
- Statements that BLM designations (ERMA/SRMA) would result in land ownership adjustments

Social/Economics and Environmental Justice

- IMPLAN modeling system does not generate any form of reliable output
- The BLM failed to conduct the necessary economic analysis to determine the impacts of sage grouse management on the local customs and culture

Special Designations

- Too much private land in Grove Creek area for an ACEC designation
- Nothing significant about Grove Creek area to warrant an ACEC designation
- Proposed ACEC too small for designation
- Requests for protection of Meeteetse Spires ACEC from nonrenewable energy development
- Disagreement with proposed acreage of Pryor Foothills RNA ACEC (suggested several alternatives with larger acreages)
- Disagreement with proposed acreage changes/management of East Pryor ACEC

Trails and Travel Management

- Requests for more roads open for motorized travel
- Requests for more roads closed to motorized travel
- Requests for trails identified for non-motorized travel
- Statements that limiting access to OHV trails would limit social and economic development to local communities
- Requests for development of specific mountain bike trails
- BLM puts too high an emphasis on non-motorized recreation
- Requests for no seasonal closures on Sykes Ridge Road or Burnt Timber Road
- Stated that travel management in areas managed for sage-grouse protection will lead to fewer OHV opportunities and promote more wilderness designation
- Requests for better labeled route maps
- BLM proposed travel management will not allow the State of Montana to manage wildlife

Vegetation

- Stated that motorized vehicle use in the Pryors would increase the spread of invasive and noxious weeds

Wildlife

- Inflating importance of wildlife/wildlife habitat instead of the importance of access
- Inflating the concerns about sage-grouse to the detriment of energy development
- Statements of belief that predators are cause of sage-grouse decline
- Would like BLM to propose a more pro-wildlife and sportsmen friendly alternative in the FEIS
- BLM should delay RMP until Montana finishes the Governor's Sage-grouse plan
- Disagreement with proposed sage-grouse management

Outside scope

- No description/analysis of how BLM would implement E.O. 13443
- No more horse gathers, no use of pzp,
- Requests for removal of exclosures in Pryor Mountain Wild Horse Range
- Requests for reintroduction of the Sorenson Extension (NPS land) to the PMWHR
- Requests for opening Tony Island and Tony Island Spring (USFS land) to the PMWHR
- Requests for removing the USFS fence on the PMWHR
- Request for protection of Cloud's Family
- Requested BLM purchase private land in PMWHR for continued wild horse use
- Requests that BLM should purchase mineral rights in Meeteetse Spires ACEC
- Surprised about the number of government jobs associated with the management of this area and lack of information gathered from the employees
- Comments on the B&PPNM DRMP that referred to pages/volumes of the Miles City DRMP and HiLine DRMP
- Requests to include development of private minerals BLM economic analysis
- Lack of BLM use of science based information to support statement
- Felt the RMP failed to acknowledge the basic needs of the U.S. and the world's population for food
- Requests to consider environmental justice at the implementation level NEPA analysis
- Stated BLM was not in compliance with the NHPA as no Class III cultural inventory was done before writing this document

5.5.6 BLM Review and Response to Comments

The comments have been categorized by issue headings and include excerpts and/or entire portions of comments received, along with BLM's response to the comment. After careful review and consideration of the comment, BLM prepared a response to address the comments. The BLM response indicates whether or not the commenters' points resulted in a change in the document. As a result of public comments, changes were made to the Draft RMP/EIS and reflect consideration given to public comments. Table 5-8 includes the comments and the BLM response, with a statement as to whether or not the document was changed.

Comments citing editorial changes to the document were reviewed and incorporated. The Proposed RMP/Final EIS has been extensively technically edited and revised to fix typos, missing references, definitions, and acronyms, and other clarifications as needed.

During the public comment period, the BLM received a total of 771 comment letters or emails, of which 463 were unique comment documents and more than 276 were form letters. Comments submitted by the public represented the full range of issues and concerns during the comment period. The BLM received comments from a range of entities, as listed below: Comment Documents by Affiliation (excluding form letters). The BLM affiliated comment documents with a government agency or non-governmental organization if the comment document was received on official letterhead or was received through an official agency or organization e-mail address. The BLM classified all other comment documents as unaffiliated individuals. The BLM received the most comment documents from unaffiliated individuals.

Comment Documents by Affiliation (excluding form letters)

- American Motorcyclist Association
- Avian Power Line Interaction Committee
- Bike Net
- Billings Motorcycle Club
- Boone and Crockett Club
- Campfire Club of America
- Carbon County Commission
- Citizens for Balanced Use
- Congressional Sportsmen's Foundation
- Families for Outdoor Recreation
- Fidelity Exploration and Production Co.
- Gordon F. Lee Group
- Junction City Ranch Co.
- Magic City 4x4
- Montana Association of Grazing Districts
- Montana Attorney General
- Montana Audubon and Audubon Rockies
- Montana-Dakota Utilities Co.
- Montana Dept of Environmental Quality
- Montana Dept of Natural Resources and Conservation – NELO
- Montana Dept of Transportation
- Montana Environmental Information Center
- Montana Fish, Wildlife, and Parks
- Montana House of Representatives, Kerry White
- Montana Land Reliance
- Montana Petroleum Association
- Montana State Historic Preservation Office
- Montana Public Lands Council
- Montana Wilderness Association
- Montana Trail Vehicle Riders Association

- Montana Wool Growers Association
- National Rifle Association
- National Shooting Sports Foundation
- North American Bear Foundation
- NorthWestern Energy
- Northwest Mining Association
- Northern Plains Resource Council
- Our Montana
- Pawnee Nation of Oklahoma
- Pheasants Forever
- Phillips County
- Prairie County
- Public Lands/Water Access Association
- Sierra Club
- Signal Peak Energy
- The Base Camp
- The Cloud Foundation
- The Pryors Coalition
- Theodore Roosevelt Conservation Partnership
- Trout Unlimited
- Western Environmental Law Center
- Western Watersheds Project
- Wheatland County/Lund Law
- World Wildlife Fund Northern Great Plains Program & Audubon Rockies
- US Forest Service Nez Perce National Historic Trail
- US Environmental Protection Agency
- US National Park Service Lewis and Clark National Historic Trail

5.5.6.1 Commenter Index

The following list in Table 5-4 displays the names of the individuals, groups, organizations, businesses, and governmental agencies that submitted substantive comments on the Draft RMP/EIS and the corresponding comment letter number. Letters and emails (including form-type letters and emails) that did not contain substantive comments are not included in the index or in the Responses to Public Comments section below (Table 5-8).

Table 5-4: Commenter Index

Commenter Name	Comment Letter Number
lmugshee1969@aol.com	0001
Abram, Carl and Georgia	0002
Allen, Fawn	0003
American Motorcyclist Association – Sean Hutson	0004
Anderson, Vonnie	0005
Auguston, Susan	0006

Auren, Nancy	0007
Avery, Shira	0008
Bahr, Richard	0009
Bailey, Helen	0010
Bailey, Toni	0011
Bailey, Mickey	0012
Barbrey, Tom	0013
Barker, Georgia	0014
Barnard, Grant	0015
Barthuly, Joe	0016
Bateman, Guy Dean	0017
Bauer, Kathleen	0018
Beland, Sue	0019
Bennett, Donna	0020
Bennett, Suzanne	0021
Bennett, Jim	0022
Barard, David	0023
Berardo, Lin	0024
Berg, Mary	0025
Biddle, Belinda	0026
Bishop, Norman	0027
Bishop, Matt	0028
Bk1492@aol.com	0029
Blackburn, Victoria	0030
Blair, Allen and Karen	0031
Keewaydin Ranch, Francis Blake	0032
Bland, Marsha	0033
Blank, Dee	0034
Bike Net – Jeff Bollman	0035
Borbone, Beth	0036
Brabant, Darlene	0037
Bragg, Vicky	0038
Brengle, Blaine	0039
Briggs, Steve	0040
Brown, Denise	0041
Montana Wool Growers Association – Jim Brown	0042, 0428
Brown, Mikayla	0043
Brown, Patty	0044
The Base Camp – Scott Brown	0045
Brunner, Linda	0046
Bruns, Mark	0047
Buhr, Susan	0048
Buley, Sara	0049
Buttrell, Maggi	0050

Campbell, Allison	0051
Canoe, Alcona	0052
Cassario, Judith	0053
Ceci, Cathy	0054
Center, Dean	0055
Chadwick, Lark	0056
Cheverton, Erica	0057
Citizens for Balanced Use – Kerry White	0058
Clay, S.	0059
ccl.ppl@telus.net	0060
Clouse, Pan	0061
Coate, Julie	0062
Collier, Jane	0063
Conder, Cary A.	0064
Corzine, Diana	0065
Creedon, Janet	0066
Cubel, Judy	0067
Cumin, Cal	0068
Cunningham, Bill	0069
Curnel, Karen	0070
Custard, Lindalee	0071
Soloman, Cynthia	0072
Dahl, Frank	0073, 0074 (dup), 0075
Dailey, Carson	0076, 0077(dup),
Davey, Bill and Ann	0078
Davis, Clarice	0079
Davis, Pat	0080
Dector, Mike and Sarah	0081
Deutsch, Donna	0082
Devlin, Todd	0083, 0084, 0085(dup), 0086, 0087, 0088, 0089, 0090, 0091, 0092, 0093, 0094, 0095,
Dickerson, Donna	0096
DiMarco, Jerry	0097
Dixon, Lisa	0098
DNRC – NELO – Barney Smith	0099
Dodot, Holy	0100
Dombeck, Linda	0101, 0102
Donnes, Charline	0103
Dowling, Kristi	0104
McCracken, Clayton	0105
Billings Motorcycle Club – Mark Lenhardt	0106
Dronkers, Pete	0107
Elmore, Sandra	0108
US EPA – Suzanne J. Bohan	0109
US EPA – Amy Platt	0110

Evans, Ann	0111
Evans, Jude	0112
Evans, Heather	0113
Exley, Jack	0114
Farnes, John	0115
Felton, Jim	0116
Ferrell, Doug	0117, 0118
Fidelity Exploration and Production Co.	0119, 0120(dup), 0121
Finnegan, Marian	0122
Northern Plains Resource Council – Rebecca Fischer	0123
Fish, Pat	0124
Fitzpatrick, Sena	0125
Flood, Renee	0126
Forehand, Dick	0127
Foulger, David	0128
Montana Attorney General – Tim Fox	0129
Funk, Wendell	0130
Fuselier, Marilyn	0131
Garagnani, Carla	0132
Garvey, Lydia	0133
Gasbarro, Donna	0134
Trout Unlimited – Michael Gibson	0135
Gierach, Paul	0136
Gilbertz, Susan	0137
Good, Mark	0138
Goolsby, Jen	0139
Gordon F. Lee Group	0140
Graham, Lori	0141
Grams, Rick	0142
Greenwood, Laurie	0143
Grenchi, Ann	0144
Guido, Frank	0145
Gulbrandson, Dave	0146
Haas, Claudia	0147
Hanick, Vic and Linda	0148
Hannon, Cathy	0149
Hanson, Greg	0150
Hantz, Carlin	0151
Harney, Maureen	0152
Harrison, Susan	0153
Hayben22@aol.com	0154
Hazher, Jerica	0155
Hehn-Bradley, Jean	0156
Montana Association of Grazing Districts and	0157

Montana Public Lands Council – Jay Bodner	
Western Environmental Law Center, Montana Environmental Information Center, and Sierra Club – Shiloh Hernandez	0158, 0409, 0456 (dup), 0457 (dup), 0458 (dup)
Theodore Roosevelt Conservation Partnership – Hal Herring	0159, 0354
Higgins, Gail	0160
Hopwood, Valerie	0161
Horan, Tim	0162
Horne, Nancy	0163
Howard, Lynn	0164
Hudeck, Dorothy	0165
Hudson, Hank	0166
Jackson, Sharon	0167
Jaquith, Phil	0168
Jay, Vickie	0169
Johannesen, Judi	0170
Lund Law – Wheatland County Community Members – Breeann Johnson	0171
Junction City Ranch Co.	0172, 0173(dup)
Kamps, Steve	0174
Karnos, David	0175
Magic City 4x4 – Doug Kary	0176
Keenen, Elizabeth	0177
Keiper, Kenneth	0178
Kerr, Chuck	0179
Kilmer, Tom	0180
Kilzer, Edward	0181
King, Paula	0182
Kinn, Katie	0183
Liddick, Pamela	0184
Kligerman, Jack	0185
Knapp, Ralph	0186
Knight, B.	0187
Kobinger, Joachim	0188
Kopec, Len	0189
Kraus, Jim	0190
Kreidler, Jeffrey	0191, 0192, 0193(dup)
Kriegel, Henry	0194
Kronmiller, Bill	0195
Krouse, Susan	0196
Taylor, Trevor	0197
Landsgaard, Paul	0198
Lapis, Ted	0199
Lashaway, Lisa	0200

Lavallee, Kris	0201
Leasure, Karen	0202
Lesica, Peter	0203, 0204
redacted	0205
Longo, Cynthia	0206
Lyman, Thomas	0207
Lyman, Jennifer	0208
Lynch, Janet	0209
Mackin, Bob	0210
reacted	0211
Mahon, Michael	0212
Makara, Mike	0213
Marchand, Diane	0214
Margaret	0215
Marianne	0216, 0217
Markham, Ann	0218
Marshall, Amelia	0219
Martin, Stella	0220
Mattmroczka@sbcglobal.net	0221
McCracken, Clayton	0222, 0223, 0224, 0225, 0226
Mcguire, Molly	0227
McIlhatten, Sharon	0228, 0229
Families for Outdoor Recreation – Ed Melcher	0230, 0422, 0423(dup)
Meloy, Tim	0231
Messenich, Jodi	0232
Messersmith, Kymber	0233
Miller, Neil and Jennifer	0234
Our Montana – Lee Miller and Mike Penfold, Public and Water Access – John Gibson	0235
Mize, Stacy	0236
USFS, NPNHT – Julie Molzahn	0237
Mom & Pop Products - Donald and Dolores Kaleta	0238, 0239(dup)
Montagne, Joan	0240
Montenegro-Long, Elena	0241
Moseman, Karen	0242
Moseman, Scott	0243
Montana Petroleum Association – David A. Galt	0244, 0245, 0426, 0427(dup)
Montana Fish, Wildlife, and Parks – Jeff Hagener	0246, 0249
Montana Attorney General – Tim Fox	0247
Montana Dept of Environmental Quality – Bonnie Lovelace	0248
Mulvey, Phil	0250

Myers, David	0251
Nelson, Michael	0252
Nemes, Joe	0253
Neria, Meredith	0254
Newbold, Alison	0255
Newell, Susan	0256, 0257
Newton, Anita	0258
Nguyen, Anh	0259, 0429
Nichols, Yonnie	0260, 0261(dup)
Norton, S.R.	0262
Nye, Barbara	0263
Ockey, Mark	0264
Omen, David	0265
Orr, Taylor	0266
Orr, William	0267, 0268(dup)
Orser, Effie	0269
Oz, Kristal	0270
Pacini, Paul	0271
Parson, Wayne D. and Cynthia A.	0272
Patten, Eva	0273
Pawnee Nation of Oklahoma	0274
Peddy, Jan	0275
Perron, Julie Anderson	0276
Pfister, Ellen	0277
Phariss, Daniel	0278
PHarrin120@aol.com	0279
Pierce, Nancy A.	0280
Pizzo, Don	0281
Platt, Amy	0282, 0283
Public Lands/Water Access Association – John Gibson	0284
Polick, Melissa	0285
Pollock, Diane	0286
Powers, Larry	0287
Pubic, Jean	0288, 0289, 0290, 0291
Raber, Katie	0292
Redfield, Alan	0293
Montana Trail Vehicle Riders Association Reierson, Bruce	0294, 0295, 0438
Rhodes, Peggie	0296
Richardson, Gail	0297
Ridgway, James	0298,0299, 0300, 0301, 0302, 0303, 03040305, 0306, 0307
Rjsj9840@aol.com	0308
Robb, Cheryl	0309

Rosema, Sharon	0310
Ryan, Richard and Jacqueline	0311
Salmonsens, Susan	0312
Montana Wilderness Association – Cameron Sapp	0313
Schappek, Marianne	0314
Scheffer, Paul	0315
Scranton, Eric	0316
Sentz, Gene	0317
Sessions, Addison	0318
Sheffman, Sara	0319
Avian Power Line Interaction Committee – Sherry Liguori	0320
Shields, Zia	0321
Shores, Karen Cheney, Eric and Anni	0322
Montana State Historic Preservation Office – Kathryn Ore	0323
Sievers, Jack	0324
Simmons, John P.	0325
Sindelar, Mona	0326
Singh, Susan	0327
Sloanebiking@yahoo.com	0328
Smeets, Erna	0329
Smith, Stephanie	0330
redacted	0331
Starmer, Michael	0332
Starshine, Dorothy	0333
Stein, Julie	0334
Steinmuller, Patti	0335
Steinmuller, David	0336
Stribling, Barbara	0337
Strong, David	0338
Stroombeek, Carolyn	0339
Strouf, Dale	0340
Suminski, Rita	0341
Swank, Gene	0342
Talbert, Linda	0343
Tatz, Janet	0344
Taylor, Mark	0345
Tettenburn, Lindsey	0346
Thunstrom, Gerald	0347
Tibbetts, June	0348, 0349(dup)
Montana Dept of Transportation – MichaelTierney	0350
Tighe, Dennis	0351

Tillett, Jeri	0352
timabby@windstream.net	0353
Trigg, Ashley	0355
Carbon County Commissioner – Doug Tucker	0356
Turner, Larry	0357
Verderosa, Danielle	0358
Voeller, Marian	0359
Vojtko, Martha	0360
Walker, Amanda	0361
The Pryors Coalition - Dick Walton	0362, 0363
Wells, Joanne	0364
White, Sally	0365
Montana House of Representatives – Kerry White	0366
Whitney, Annie	0367
Wideman, Roger	0368
Wiet, John and Dee	0369
Wilson, Marilyn	0370
Winslow, Susan	0371
Worthington, Alycia	0372
Wright, Jo Ann	0373
Wyberg, Bryan	0374
Wyss, Dianne	0375
York, Leonard	0376
Yuz, Lin	0377
Zaccagnini, Robert and Stephanie	0378
Anderson, Chris	0379
Beh, Ty	0380
Western Environmental Law Center – Matthew Bishop	0381
Blakely, Gail	0382
Blayer, Cynthia	0383
Bornus, Michael	0384
Brcic, Linda	0385
Western Watersheds Project – Travis Bruner	0386
Pheasants Forever – Yellowstone Valley Chapter #434 - Michael J. Bullock	0387
Buskin, Helaine	0388
Cardy, Cindy	0389
American Bird Conservancy – Daniel Casey	0390
Cearley, Susan	0391
Cruz, April	0397
Dakota Coal Company – Robert Bartosh	0398
Davey, Bill and Ann	0399
Littlebear9641@yahoo.com	0400

Deveraux, Jody	0401
Doze, Steve	0402
Montana Audubon and Audubon Rockies – Janet Ellis	0403
Enk, Michael	0404
NPS L&CNHT – Miki Griffen, Mark Weekley	0405
Griffith, Lisa	0406
Harding, Rita	0407
Hathaway, Susan	0408
Western Environmental Law Center – Shiloh Hernandez	
Prairie Hills Audubon Society – Nancy Hilding	0410
Joerndt, Judith	0412
World Wildlife Fund Northern Great Plains Program – Martha Kauffman (Mara Johnson) Audubon Rockies – Daly Edmunds	0413
Judice, Phyllis	0414
Kamps, Steve	0415
Montana-Dakota Utilities Co. – Abbie Krebsbach	0416
Loftin, Elizabeth	0417
Mabee, Carolyn	0418
McCracken, Meredith	0419
McCollister, Lori	0420
McFarland, Jenne	0421
Miller, Anthony	0424
Montana Land Reliance – Kendall Van Dyk	0425, 0447
National Rifle Association, National Shooting Sports Foundation, North American Bear Foundation, Congressional Sportsmen’s Foundation, Campfire Club of America, Boone and Crockett Club	0430
Petty, Dean	0431
Phillips County	0432, 0433
Posey, Chris	0434
Prairie County	0435
The Pryors Coalition – Dick Walton	0436
Quinby, Sharon	0437
Russis, Kathy	0439
Salvo, Mark	0440
Shuster, Lloyd	0441
Signal Peak Energy – John DeMichiei	0442
Northwest Mining Association – Laura Skaer	0443

NorthWestern Energy – Mary Gail Sullivan	0444
Urban, Lesa	0445
Vancos, Joy	0446
The Cloud Foundation – Lauryn Wachs	0448, 0449, 0450, 0451, 0452, 0453
Walton, Dick	0454
Webster, Margaret	0455
Wheatland County	0459
Winkler-Bluhm, Patricia	0460
Hilding, Nancy	0461
Lee, Christy	0462
Ford, Becky	0463
Form Letter A – Americans for Economic Freedom (98 letters)	See 0062 or 0262 for example of letter
Form Letter B – Wild Horse/Pryor Mountain Wild Horse Range (165 letters)	See 0022 or 0448 for example of letter
Form Letter C – County Protest (13 letters)	See 0171 for example of letter

A summary of major changes between the Draft RMP/EIS and the Proposed RMP/Final EIS can be found in Chapter 2, Section 2.3.4, Changes between the Draft RMP/EIS and the Proposed RMP/Final EIS.

5.5.6.2 Form Letters

The BLM received approximately 276 form letters. Form letters are standardized and duplicated letters that contain the same text or portions of text and comments. The BLM reviewed the form letters and extracted and analyzed any comments unique and supplemental to the form letter; however, the BLM considered comments with the same text as one comment. The BLM designated the first form letter from each originating entity as the “master” comment document and reviewed each subsequent form letter to ensure the content was identical to the master comment document. The BLM received form letters from

- Americans for Economic Freedom (98)
- Wild Horses or PMWHR letters (165)
- Montana Counties (13)

When form letters included additional text, the BLM reviewed and processed them if they contained substantive individual comments.

5.5.7 Other Public Involvement

On June 22, 2013, at the request of (and organized by) some Grove Creek residents, members of BLM staff met with 11 members of the public at the Belfry School to answer questions about travel management, ACECs, and fire management in the Grove Creek area.

5.5.7.1 Newsletters

Periodic newsletters have been developed and distributed to keep the public informed of the Billings and Pompeys Pillar National Monument RMP revision. In total, one newsletter has been e-mailed and mailed to individuals on the Billings and Pompeys Pillar National Monument RMP mailing list. The newsletters have also been made available for download on the Billings and Pompeys Pillar National Monument RMP website.

5.5.7.2 Website

The Billings and Pompeys Pillar National Monument RMP website can be found at: http://www.blm.gov/mt/st/en/fo/billings_field_office/rmp.html . The website serves as a virtual repository for documents related to the development of the RMP, including announcements, newsletters, and documents. The documents are available in PDF format to ensure they are accessible to the widest range of interested parties. The website provides the public current status and project contact information.

5.5.7.3 Future Public Involvement

Public participation efforts have and will be ongoing throughout the remainder of the process of revising the RMP and developing the EIS. The Proposed RMP and Final EIS considered all substantive comments received during the 90-day public comment period for the Draft RMP and EIS. Members of the public with standing will have the opportunity to protest the content of the Proposed RMP and Final EIS during the specified 30-day protest period. The Record of Decision will be issued by the BLM following the Governor's Consistency Review and protest resolution.

5.5.8 List of Preparers

An interdisciplinary team of resource specialists from the BLM Billings Field Office, the BLM Montana State Office (MSO), and the Miles City Field Office (MCFO) prepared this Draft RMP/EIS (Table 5-5).

Table 5-5 Billings and Pompeys Pillar National Monument RMP/EIS Preparers

Billings and Pompeys Pillar National Monument RMP/EIS Preparers		
Name	Education Years of Experience Professional Discipline	Responsibility
Jim Sparks	B.S. Rangeland Ecology 28 years Field Manager	Reviewer
Craig Drake	B.S. Natural Resource Management, emphasis in Watershed Management (Hydrology) 19 years Assistant Field Manager	Reviewer
Irv Leach	Fire Management Officer	Reviewer
Jeff Kitchens	B.S. Psychology and Environmental Science M.S. Forest Sciences 15 years Pompeys Pillar National Monument Manager	Reviewer
Susan Bassett (MSO)	B.S. Chemical Engineering, B.A. English 20 years Physical Scientist (Air)	Air, Climate
John Bown (MSO) (deceased)	B.S. Geology, M.S. Geology & Geophysics 34 years Geologist	Fluid Minerals
Jared Bybee	B.S. Environmental and Natural Resource Sciences: Range Management emphasis 14 years Rangeland Management Specialist / State Wild Horse and Burro Specialist	Wild Horses, Pryor Mountain Wild Horse Range
Sheila Cain	23 years GIS Specialist	GIS
Tom Carroll (deceased)	B.A. History 22 years Realty Specialist	Realty, Cadastral Survey, and Lands
Dave Coppock (MSO) (retired)	Geologist	Locatable Minerals, Mineral Materials, Coal
Dustin Crowe	B.S. Natural Resource Ecology and Rangeland Management 3 years Rangeland Management Specialist	Soil, Air, Vegetation (rangelands), Livestock Grazing
Chad Cullum		Wildfire Ecology and Management
Gregory Fesko (MSO)	B.S., M.S. Geology 17 years Coal Program Coordinator	Coal, Geology
Tim Finger	B.S. Zoology and Wildlife Management 32 years Outdoor Recreation Planner	Lands with Wilderness Characteristics, Visual Resources, Cave and Karst Resources, Recreation and Visitor Services, Transportation and Facilities, Trails and Travel Management, Wild and Scenic Rivers, WSAs

Billings and Pompeys Pillar National Monument RMP/EIS Preparers		
Name	Education Years of Experience Professional Discipline	Responsibility
Bob Flesch (MSO)	B.S. Social Science, B.A. Anthropology, M.S. Public Administration 14 years Assistant Fire Management Officer	Wildfire Ecology and Management
Linda E. Hardy (retired)	A.A.S. Recreation; B.S. Business 16 years Outdoor Recreation Planner	Lands with Wilderness Characteristics, Visual Resources, Recreation and Visitor Services, Transportation and Facilities, Trails and Travel Management, Wild and Scenic Rivers, WSAs
Craig Howells		Wildfire Ecology and Management
Renee Johnson (MSO)	B.A. English and Anthropology (double major) 23 years Renewable Energy Project Manager	Renewable Energy
Ernie McKenzie (term expired 2015)	B.S. Biology with emphasis in Aquatic Ecology 10 years Biological Sciences Technician (Fisheries, Riparian)	Water, Riparian and Wetlands, Fisheries Habitat and Special Status Species (Fisheries), Travel Planning
Bob Meidinger (retired)	B.S. Education with extended biology major/chemistry minor; M.A. Education Computer option 25 years RMP/RMS; Fuels Specialist /Forestry	Air, Climate Change, Soil, Forest and Woodlands, Forestry and Woodland Products, Travel Management
Larry Padden	B.S. Range and Forest Management 23 years Natural Resource Specialist	Rangeland Vegetation, Livestock Grazing, Invasive Species and Noxious Weeds
Jay Parks	B.S. Fish and Wildlife Management with a minor in Range Management 34 years Wildlife Biologist	Wildlife Habitat and Special Status Species (Wildlife)
Melissa Passes (transferred to BIA in 2012)	B.A. Environmental Studies; M.S. Land Resources and Environmental Sciences 10 years Natural Resource Specialist	Invasive Species and Noxious Weeds
Michael Philbin (MSO)	B.S. Geography - Watershed Emphasis; M.S. Forest Resources - Watershed Emphasis 21 years Hydrologist	Soil, Water, Air, Riparian, and Fire Rehabilitation Program Lead
Kimberly O. Prill (MSO)	B.S. Psychology, minor study in Economics; MEd. Organizational Communication 20 years Land Use Specialist	Reviewer
Tami Sabol (MCFO) transferred to USFS in 2013	B.S. Forestry 18 years Forester	Forest and Woodlands, Forestry and Woodland Products
Carolyn Sherve-Bybee	B.A. German; M.A. Anthropology with Archaeology emphasis 21 years RMP Team Lead/Archaeologist	Cultural Resources, Paleontological Resources, ACECs, National Historic Trails

Billings and Pompeys Pillar National Monument RMP/EIS Preparers		
Name	Education Years of Experience Professional Discipline	Responsibility
Nora Taylor (MSO) (retired)	B.S. Wildlife Management / Range Management 31 years Botanist	Special Status Plants
John Thompson (MSO) (retired)	B.S. Economics/Political Science; M.S. Agricultural Economics (emphasis in Resource Economics) 36 years Planning & Environmental Specialist/Economist	Economist/ Planning & Environmental Specialist
Joan Trent (MSO) (retired)	B.A. Psychology, M. En. Environmental Science 30 years Sociologist	Social
Wendy Velman (MSO)	B.A. Botany 11 years Botanist	Special Status Plants
Charles Ward (retired)	A.S. Park Management, B.S. Recreation and Park Administration 34 years RMP; BLM LEO	Lands with Wilderness Characteristics, Visual Resources, Cave and Karst Resources, Recreation and Visitor Services, Transportation and Facilities, Trails and Travel Management, Wild and Scenic Rivers, WSAs
AECOM (Chapter 3 and portions of Chapter 4)		
Steve Graber	B.S. Natural Resources Management; B.A. Economics 6 years Realty, Cadastral Survey, and Lands and Renewable Energy	
Patti Lorenz	B.S. Wildlife Biology 8 years Wildlife Habitat and Special Status Species (Wildlife)	
Melanie Martin	M.S. Environmental Policy and Natural Resource Management; B.S. Agriculture, Environmental Protection 13 years Senior Technical Review	
Kim Munson	M.A. Anthropology; B.A. Anthropology 18 years Cultural Resources and Native American Concerns	
ARS (Trails and Travel Management)		
Tom Folks	B.S. Recreation Park Planning and Resource Management 27 years Land Use Planning Specialist	
Nathan Holland	B.S. Earth Sciences 10 years Travel Management Planning Specialist	

Billings and Pompeys Pillar National Monument RMP/EIS Preparers		
Name	Education Years of Experience Professional Discipline	Responsibility
Les Weeks	M.A. Biogeography; B.A. Ecosystems Analysis 20 years Land Use Planning Specialist	

Table 5-6 Montana State Office Reviewers

Name	Name
Jim Albano (retired)	Chris Miller
Terri Bakken (retired)	Mike Philbin
Susan Bassett	Kim Prill (transferred to BOR)
Jim Beaver (retired)	Frances Rieman
John Bown (deceased)	Mark Sant
Jared Bybee	Ken Schmid
John Carlson	John Simons (retired)
Greg Fesko	Gary Smith
Craig Haynes (retired)	Floyd Thompson
Bill Hensley	John Thompson (retired)
Renee Johnson	Joan Trent (retired)
Pascual Laborda (retired)	Wendy Velman
Greg Liggett	David Wood (NOC)
Karen Michaud	

Table 5-7 Cooperating Agencies and Contacts

Agency /Organization	Contact	Location
<i>Cooperating Agencies and Contacts</i>		
Big Horn County	Commissioner Keith Grant	Basin, Wyoming
Carbon County	Commissioner Doug Tucker	Red Lodge, Montana
Department of Natural Resources and Conservation, Northeastern Land Office	Barny Smith	Lewistown, Montana
Department of Natural Resources and Conservation, Southern Land Office	Richard Moore	Billings, Montana
Golden Valley County	Commissioner David Paugh	Ryegate, Montana
Bureau of Indian Affairs	Rick Stefanic	Billings, Montana
Montana Association of Conservation Districts	Jeff Tiberi	Helena, Montana
Montana Fish, Wildlife, and Parks	Jeff Hagener, Director	Helena, Montana
Musselshell County	Commissioner Larry Leske	Roundup, Montana
Northern Cheyenne Tribe	Leroy Spang, President Conrad Fisher, THPO	Lame Deer, Montana
Bureau of Reclamation	Dan Jewell	Billings, Montana
State Historic Preservation Office (Montana)	Stan Wilmoth	Helena, Montana
Wheatland County	Commissioner Tom Bennett	Harlowton, Montana
Yellowstone County	Commissioner Bill Kennedy	Billings, Montana
<i>Other Interested Parties</i>		
Wyoming Game and Fish	Kevin Hurley	Cody, Wyoming
U.S. Fish and Wildlife Service	Mark Wilson	Helena, Montana
State Historic Preservation Office (Wyoming)		Laramie, Wyoming

5.5.9 Responses to Public Comments

This section (Table 5-8) contains the substantive comments received from individuals, groups, organizations, businesses, and governmental agencies during the comment period on the Draft RMP/EIS, and the corresponding BLM responses to the comments. All public comments received were carefully considered. As described above, only substantive comments are addressed and received a response in the Proposed RMP/Final EIS. Comments such as those merely expressing approval or disapproval of a proposal without reason did not receive a response in the Proposed RMP/Final EIS. Gaps in the numbering letters do not represent missing information; rather they were determined to be form-type letters, or consisted of comments that were not substantive or outside the scope of this planning process.

Table 5-8: BLM Response to Public Comments

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
DR-MTDK-BL-13-0004-1	Travel mgmt and soc/econ	The AMA has concerns that the DEIS does not fully take into account the social and economic costs of limiting access for responsible OHV riders. In fact, alternative D, the preferred alternative, limits public access on OHV trails by declaring nearly 200 miles of trails to be for administrative use only. This is contradictory to how the alternative is presented in the BLM's fact sheet which states only 59 miles of trails will be closed. Designating a trail for administrative use only is de facto closure for local riders. The AMA suggests that the Bureau of Land Management revisits the designation of trails for administrative use only. With minimal additional resources, the BLM could keep nearly 200 miles of trails open for public use. Without these trails I believe many local communities will face adverse economic affects.	n	Thank you for your concerns and comments.
DR-MTDK-BL-13-0010-1	WILD HORSES, PMWHR	I am writing to ask that you please prioritize any enclosures not currently in use on the above-listed range. You have used them for data collection in the past and right now they currently take up space. The large ones on Sykes Range could be a safety hazard to foals. This has actually happened in the past with other enclosures.	N	Thank you for your comment
DR-MTDK-BL-13-0010-2	PMWHR	Please do not allow target shooting on the mountaintop area from Memorial Day through Labor Day. It should be prohibited year round in the entire PMWHR. It can cause undue stress on the wild horses and other wildlife, increase the risk of accidental horse shooting and in an endangerment to the other visitors on the mountain.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS.
DR-MTDK-BL-13-0010-3	WILD HORSES, PMWHR	Please work with the National Park Service to reintroduce the Sorenson Extension into the horse range. Please work with the Forest Service to include the mountaintop area and open meadows, as well as Tony Island Spring.	N	Thank you for your comment.
DR-	ACEC	The Meeteetse Spires area deserves maximum protection including no private	N	"Thank you for expressing your concerns. While statements of opinion

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
MTDK-BL-13-0015-1		mineral rights and an eventual Wilderness designation. (The adjacent Forest Service Research Natural Area could be included to make a large Wilderness area). This entire unique, beautiful area is being managed nicely as ACEC but will need more permanent protection as nearby oil, gas and mineral activity comes closer and the US puts more pressure on these lands for nonrenewable energy.		(including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the B&PPNM RMP/EIS.
DR-MTDK-BL-13-0015-2	ACEC	The Castle Coulee area near Weatherman Draw deserves protection and will be a great addition to the area if protected from motor vehicle use/damage and from oil, gas and mineral activity. The beautiful rock formations and Native American cultural and archaeological sites need protection and preservation.	n	Thank you for expressing your concerns. While statements of opinion do not require specific responses text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS. This area has already been included in the proposed expanded Weatherman Draw ACEC. See table 2-6.3 – Weatherman Draw. Please table 2-6.3 for proposed management of Weatherman Draw.
DR-MTDK-BL-13-0018-1	PMWHR	Please do NOT close the Burnt Timber and Sykes Ridge Roads between April 15 and June 15. Protect the horses and the habitat by clearly advising the public of penalties for off road use of the land.	n	"Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS.
DR-MTDK-BL-13-0020-1	lands with wilderness characteristics	Manage Weatherman Draw, Bad Canyon, Yellowstone River Islands and Clark's Fork River Islands like the other lands identified as having wilderness qualities. Specifically: 1. Close the areas to oil and gas leasing, or allow leasing only with a "no surface occupancy" stipulation with no exceptions, waivers, or modifications. 2. Designate as areas where rights-of-way for powerlines and pipelines are excluded. 3. Designate the areas as excluded for wind farms. 4. Close these wildlands to the construction of new roads. 5. Close all identified wildlands to mining. 6. Close lands with wilderness characteristics to motorized recreation. 7. Restrict construction of new structures and facilities unrelated to the preservation or enhancement of wilderness characteristics.	n	"Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS.
DR-MTDK-BL-13-0020-2	Travel mngt	Close the Demijohn Flat route (Pryor Mountains) to motorized use to protect a culturally sensitive area. The 1 1/2 mile route would also make a good, quiet, non-motorized trail and create a seamless boundary between the Burnt Timber Canyon Wilderness Study Area and adjacent lands identified by the BLM as having wilderness characteristics. Close the two-track leading into Bear Canyon (Pryor Mountains) to motorized use beyond Manage all lands with wilderness value... the mouth of the canyon. Two parallel motorized routes in the area already provide motorized access into this part of the Pryor Mountains. Now the BLM proposes to open a third, Graham Trail, to motorized use. What is needed is a quiet, non-motorized trail. Designate quiet, non-motorized trails as part of the travel management plan. The plan designates 130 miles of motorized	n	"Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		routes, but fails to designate any quiet, non-motorized trails in the Pryor Mountains and most other parts of the district.		
DR-MTDK-BL-13-0021-1	lands with wilderness characteristics	Please manage Weatherman Draw, Bad Canyon, Yellowstone River Islands + Clark's Fork River Islands like the other lands identified as having wilderness qualities.	n	"Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS
DR-MTDK-BL-13-0023-1	ACEC, Travel Mngt, Fire	I reside at 47 Horny Toad Trail, Belfry MT 59008, which is included in your Draft Resource Management Plan. My property description is: TR 32 COS 938. My home is 3200 square feet and is powered solely by 24 solar panels and 2 wind turbines. My home sits on 20 acres. My home was built in 2006, so I have lived here for seven years. The direct access to my home is South of Belfry on MT Hwy 72, to West on Grove Creek Road. Passing through the main gate of the Grove Creek Ranch I bear left on public access for approximately 1.2 miles to turn West on the Meeteetse Trail. I pass through one chained (not locked) BLM cattle gate on the public access road before turning on the Meeteetse Trail. It is my understanding in the Draft Resource Management Plan that BLM is considering closing the access road at the main gate of the Grove Creek Ranch at the end of Grove Creek Road. Designating the area where I live as an ACEC area would adversely impact myself and the other property owners in my immediate vicinity, particularly with fire management and road improvements. [There is too much private land to consider this change to an ACEC area.] A point in hand regarding fire safety: a year and a half ago, during the Hole in the Wall fire, the National Park Service dispatched a ranger to my home to warn me about possible evacuation and to have myself and my family, ready to evacuate, bags packed. The next day a Carbon County Sheriff's Deputy came to my home to reiterate the fire hazard being caused by the Hole in the Wall fire and to underscore the possible danger and the threat of immediate evacuation. There is no phone service at my home (because there are no telephone poles within three miles) so it is not possible for fire safety personnel to contact me any other way than directly traveling to my home. Re-routing traffic to the Chance Bridge and locking out direct evacuation routes from my home is a serious concern, when SECONDS COUNT in a raging Montana forest fire. Please do not adopt Alternative D, shutting off my connection to Grove Creek Road. Alternative D blocks direct access and evacuation routes. For safety's sake, please allow me continued direct access to my home and allow fire safety personnel direct access to my house, along with direct evacuation routes. My home site borders BLM land on two sides. My family and I appreciate everything BLM does to preserve and protect Federal Lands. Please allow me direct ingress/egress to my by not adopting Alternative D.	N	"Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the B&PPNM RMP/EIS.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
DR-MTDK-BL-13-0030-1	Coal	The northern portion of the Big Horn Basin in Montana and Wyoming is well known for its mineral resources including oil, gas and coal. Contained within this Basin is the Ft Union Geologic Formation extending from Wyoming into Montana. The Montana portion of the basin contains proven underground coal fields in the Red Lodge, Bear Creek & Grove Creek areas. Scant mention or discussion of these private resources is mentioned in the plan. The Bear Creek coal fields have produced 30 to 40 million tons of coal since mining began in the 1880's. They still contain over a billion tons of coal along the face of the Beartooth Mountains. Township 8 and 9 South, Range 20 and 21 East, the area of our greatest concern is included on the map from plan appendix M Figure M-3. We are all primarily concerned with maintaining the value of our mineral rights in the area known as Red Lodge Area, Bearcreek Area, and the Grove Creek Area. The coal resource has been documented by geologic reports extending over 100 years from professional geologists who have published their findings dating from 1907 to 2010. We can provide references if you desire. Incidentally, the subject location is not in the scenic mountains or river bottoms that fisherman, sportsman, and recreationists enjoy. It is a dusty, barren, sagebrush area where vegetation struggles to grow. This coal would be mined by underground methods with minimal surface disturbance. Because the coal does not follow ownership lines, the mine area will encompass several mineral ownerships. The coal mine(s) would produce significant economic impact amounting to 100s of millions of dollars for Carbon County, the state of Montana and the nation by creating well-paying jobs for hundreds of miners and related personnel.	N	The text describing the coal development potential of the Red Lodge-Bearcreek coalfield has been enhanced in the Chapter 2, Solid Minerals-Coal section.
DR-MTDK-BL-13-0030-2	coal	The northern portion of the Big Horn Basin in Montana and Wyoming is well known for its mineral resources including oil, gas and coal. Contained within this Basin is the Fort Union Geologic Formation extending from Wyoming into Montana. The Montana portion of the basin contains proven underground coal fields in the Red Lodge, Bear Creek & Grove Creek areas. Scant mention or discussion of these private resources is mentioned in the plan. In review of the BLM RMP as proposed, it is clear your agency is not adequately considering the economic impact of the decision in any of the alternatives presented in the plan. For over 80+ years many companies have leased oil/gas mineral rights in this area, several have drilled deep test holes. Area oil/gas leasing on BLM would be abolished or severely restricted by this plan with direct effect on adjacent taxable lands which would be closed to leasing. This action would result in \$0 income for the BLM and ultimately the general population in the United States.	n	Thank you for your comment. The text describing the coal development potential of the Red Lodge-Bearcreek coalfield has been enhanced in the Chapter 2, Solid Minerals-Coal section.
DR-MTDK-BL-13-0030-3	NEPA	The CEQ has directed agencies to gather data from reliable sources such as interviews and information from local residents which the BLM has failed to do. You did hold the open meetings, but refused to allow public comment at those meetings. How can they be considered public meetings if no public discussions	N	Thank your for your comment. The BLM Billings Field Office held 5 Open House style public meetings in which the public could ask specialists questions about the draft RMP/EIS. In order to and the public comment period on the draft RMP/EIS was open for 90 days. Also, at the request of members of the

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		are allowed? I suggest you reschedule the meetings and allow them to be public meetings as required.		public, the BLM attended a meeting on June 22, 2013 in Belfry, Montana to answer questions regarding proposed management in the Grove Creek area.
DR-MTDK-BL-13-0031-1	ACEC, Fire,	First, and foremost, I would disagree with this area being classified as an ACEC. This area is very small and not significant enough to warrant critical environmental concerns. The impact on the areas environment would be minimal. Instead the area could remain under current management plans. Management of this area under ACEC would adversely effect private property owners, as this area is greatly mixed with private property that is being developed. Recently, Beartooth Electric Coop and Nemont telephone company extended service lines into this area in order to service permanent year round residences. Managing this area as an ACEC would effect BLMs policy on wildfire management. The preferred plan of allowing naturally started fires to burn would not be acceptable in this area, as much of the BLMs property closely borders private parcels, some with structures and dwellings already on them. Not allowing mechanized ground firefighting vehicles to contain or suppress these types of fires could be detrimental to these structures, and may result in subsequent legal battles for the BLM. Additionally, the winds are much to strong in this area to permit an " ignore type policy" of fire management.	N	"Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the B&PPNM RMP/EIS.
DR-MTDK-BL-13-0032-1	Recreation	I am commenting on the Billings & Pompeys Pillar National Monument Draft Resource Management Plan Revision and specifically as it relates to Section 28, 2N, 15E. This section has been badly abused for years - trash dumped everywhere, water tanks shot up, dirt bike tracks all over the land, fences onto my land cut as well as locks shot off gates going onto my land. A stolen car was even pushed into one of the ravines. A few years ago the section was shut off to vehicular traffic and this has helped, but it is still abused - the fence has been cut and shot going onto the land, the signs stating that the land is off limits to vehicles is nearly unrecognizable because there are so many shell holes in it. There are shell casings scattered everywhere outside the section and on the section. The lock on the gate going into the land has now been shot off three times. Besides these problems it is sometimes seriously dangerous for us as the lessors to travel on the land. We never know exactly when someone is shooting out there and several times when we have been out checking water, fences or cows we have heard shells ricocheting off rocks nearby. More than once I have appeared over the hill only to find myself nearly directly in the line of fire! Luckily no personal mishaps so far and none of our cattle have been shot, but it worries me that this is a ticking time-bomb waiting to explode. My feeling is that the BLM needs to pay much more attention to this section, police it better and if it is to continue as a shooting range, make it much safer for Keewaydin Ranch. I am not sure anyone who uses it is really aware that we lease it and are out there on a somewhat regular basis.	n	"Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS.
DR-	lands with	Please manage Weatherman Draw, Bad Canyon, Yellowstone River Islands and	n	"Thank you for expressing your concerns. While statements of opinion

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
MTDK-BL-13-0034-1	wilderness characteristics	Clark's Fork River islands for wilderness, and also areas identified as having wilderness characteristics.		(including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS
DR-MTDK-BL-13-0035-1	Recreation	Four Dances Natural Area: We strongly support your preferred alternative to develop non-motorized recreational opportunities Four Dances Natural Area. We request that you make specific mention that biking would be allowed or, at minimum, that a feasibility study would be conducted. Four Dances has the unique potential to be connected to the Billings trail system. One idea that is being explored is the creation of a bike/pedestrian facility on a proposed new bridge for Interstate 90 across the Yellowstone River. This would have the potential of connecting the existing bike/pedestrian trail at Coulson Park with the northern end of Four Dances and further increase bike and pedestrian use in Four Dances. We encourage you to make an expressed decision to work with local partners to pursue federal/state funding sources, to connect the City of Billings to public lands (e.g. Paul Sarbanes Grant/Federal Lands Access Program/Recreation Trail Program).	N	"Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the B&PPNM RMP/EIS.
DR-MTDK-BL-13-0035-2	Recreation	Lewis and Clark Corridor : Bike Net is also supportive of the preservation of the Lewis & Clark River Corridor along the Yellowstone River. Bike Net has partnered with the Billings Chamber of Commerce and Yellowstone River Parks Association to develop a trail corridor analysis for a future connection between Riverfront and Mystic Parks. The preferred location of this connection would be along the Yellowstone River. Bike Net supports the establishment of a management corridor along the Yellowstone River and the proposed actions to protect the scenic values and limit development within the corridor. We also strongly support the decision to work with willing sellers to acquire easements/acquisitions along the Yellowstone River to provide for public access to a future trail corridor that would radiate out from Billings and allow for expansion of the existing trail network along the Yellowstone River.	n	Thank you for your comments. Please see Appendix J for land acquisition criteria.
DR-MTDK-BL-13-0035-3	Recreation	Acton Recreation Area : We know that BLM has been exploring opportunities to develop bike trails in this area. We request that you include specific language that confirms your commitment to developing bike trails in the area. Suggested language could be: "Develop mountain biking opportunities for a range of skill levels. Include cross-country and gravity fed (downhill) trails with appropriate facilities."	n	"Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS.
DR-MTDK-BL-13-0035-4	Recreation	Shepherd Ah-Nei Recreation Management Area: We also see the Shepherd area as having an enormous potential for future bike trail development. We ask that you add language to specifically include the intention to develop mountain bike trails in this area. We support your active management of OHV uses in this area and feel that it would be equitable and would help prevent conflict if bike	n	"Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument

*Billings and Pompeys Pillar National Monument
Proposed Resource Management Plan and Final Environmental Impact Statement*

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		trails were provided.		RMP/EIS.
DR-MTDK-BL-13-0035-5	Recreation	South Hills Motorcycle Area: We support responsible and sustainable management of motorized uses and believe that there should be opportunities for these uses. However, we are concerned with the impacts that are evident at the South Hills area. The numerous motorized hill climbs are not only an impact to the natural resources, but are also an impact to the aesthetics of the riverfront trail, particularly from Riverfront Park. We request that you limit motorcycle use to designated trails, with an emphasis on restoring the landscape visible from the riverfront trail system to meet the visual resource objectives in your preferred alternative.	n	Thank you for your concern and comments. The Visual Resource Objectives in the preferred Alternative and carried forward in the decision are to manage for VRM Class III, which provides for this kind of activity. The RMP decision is also to continue to manage the lands as an "open", (cross-county) Motorcycle-only use Area.
DR-MTDK-BL-13-0045-1	Travel Mngt	I urge you to designate non-motorized trail routes in the final Resource Management Plan to provide recreational outdoor opportunities for parts of the Pryors. I ask that the Big Sky Trail and Bear Canyon Creek Trail and the Demijohn Flat route be designated for only non-motorized use. These three areas would provide people on foot a chance to hike without worries of motorized vehicles.	n	"Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS
DR-MTDK-BL-13-0045-2	Travel Mngt	BLM's preferred alternative authorizes motor vehicle use of Graham Trail up the southwest slope of Big Pryor Mountain. That makes three redundant parallel motor vehicle routes within less than three miles. One of the three routes should be designated for non-motorized use. Of the three routes, Bear Canyon, through an Audubon Important Bird Area, would be the best non-motorized route. There would still be abundant motorized access to Big Pryor Mountain with four more motor routes up the west slope	n	"Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS. The decision to establish a non-motorized trail in Bear Canyon has been made and will be in the final RMP.
DR-MTDK-BL-13-0049-1	lands with wilderness characteristics	You have identified 12 areas in the South-Central Management Plan as wilderness-quality lands but have proposed to manage only 9 of these areas. Please commit to a more balanced management of wildlands to safeguard the last unprotected wildlands in South-central Montana. I urge you to manage Weatherman Draw, Bad Canyon, Yellowstone River Islands and Clark's Fork River Islands like the other lands you have identified as having wilderness qualities by closing the areas to oil and gas leasing, designating the areas as excluded for wind farms, closing these wildlands to the construction of the travel management plan.	n	"Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS. The management emphasis for some of the lands is ACEC, which is a priority identified in FLPMA, and which the BLM has established appropriate management prescriptions. Other units are managed as SRMA, with similar considerations given to them.
DR-MTDK-BL-13-0054-1	WILD HORSES, PMWHR	I encourage the BLM to work with the National Park Service and reintroduce the Sorenson Extension into the horse range. Adding the mountaintop areas and including the open meadows and Tony Island Spring would be a huge step forward in repairing the public's mistrust of the BLM's wild horse and burro mistreatment.	N	Thank you for your comment
DR-MTDK-BL-13-0054-3	PMWHR, Recreation	We also support BLM's decision to not allow target shooting on the mountain top area during the summer months but add that it should be prohibited throughout the entire PMWHR area! It causes undue stress not only to the wild horses, but to all other wildlife, increases the risk for accidental shootings of animals and	n	"Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		other public visitors on the mountain. Again, enforcement is key!		record associated with the Billings and Pompeys Pillar National Monument RMP/EIS.
DR-MTDK-BL-13-0058-1	Social/econ	In review of the BLM RMP being proposed it is clear your agency is not adequately considering the social and economic impact of the decision in any of the alternatives presented in the DEIS. It is common practice to use the IMPLAN modeling system for analysis of social and economic impacts but this modeling analysis is highly dependent on the accuracy of the data input in order to generate any form of reliable output. It is clear your agency has used input data which is based on "assumptions, estimates, predictions, potentials, could be, may be, expected, approximately, and about" as all of these words are used hundreds of times throughout the DEIS. The DEIS is full of these words and lacks sufficient supportable facts to make a justified decision to close vast amounts of federally managed BLM land in Montana to resource development, grazing, active forest management and multiple use recreation.	n	Opinion: Response: No text revision necessary (Thanks for the comment. Resource outputs are the amount of a resource (e.g., AUMs, recreation visits, tons of locatable minerals, etc.) that would be available for use under each alternative. Resource specialists projected annual resource outputs based on the best available information and professional judgment. Based upon public comments, resource specialists have reviewed assumptions used in this analysis to see if they need to be changed or updated. These revised assumptions have been incorporated into the analysis contained in the DEIS. The purpose of the economic analysis is to compare the relative impacts of the alternatives and should not be viewed as absolute economic values. Previous modeling experience has shown that the data contained in the IMPLAN modeling system for the various sectors are accurate representations of impacts.)
DR-MTDK-BL-13-0058-10	Social/econ	The recreation analysis is lacking in accuracy as the spending of users is not accurate. On page 4-409 of the DEIS it states that "for every 1000 visitor days, there would be a corresponding change of .15 jobs and 3,804 in labor income." Further statements include impact from non local-overnight and local overnight jobs and income. We know by the visitor use survey conducted by the Forest Service that spending per visitor user day is much higher than the \$3.80 value included in your DEIS and the overnight value of \$14.06 you used. The numbers used by the Forest Service are more than \$100 per local visitor day and \$300 per non-local visitor day. These numbers were from several years ago when fuel prices were less than a third of what they are today. Adjusted for inflation the cost per user day has risen substantially. I request you take a hard look at your user day expenditures included in your DEIS and adjust them to better reflect the true economic impact of recreation in your DEIS and present a true reflection of recreational spending to the public.	n	Labor income is not equivalent to visitor spending. If a BLM visitor spends \$100 at a hotel, only a fraction of that will translate directly to local income. Therefore, the division of labor income by visitor days to determine visitor spending is not appropriate. Indeed, this analysis uses the best available estimates of visitor spending from Stynes and White 2010, as cited on pg. 4-597 of the DEIS. These are the same data as used by the Forest Service. These data indicate that non-local day visitors spend \$65/day, non-local overnight visitors spend \$366/day, local day visitors spend \$34/day, and local overnight visitors spend \$177/day.
DR-MTDK-BL-13-0058-11	Social/econ	On page 3-159 of the DEIS it states that jobs in agriculture make up 18 percent and on page 3-160 of the DEIS it states that employment in recreation and tourism make up another 42 percent of the jobs. This total of 60 percent shows the large majority of jobs in the planning area are from agriculture and recreation. On page 3-163 of the DEIS the matrix chart reflects the usage types for recreation. Your conclusion from this table reflects more than 60 percent of the use is driven by fish and wildlife. You use this determination to bolster your conclusion of the importance of wildlife and does not accurately reflect the importance of access. I believe your analysis of the information in the chart on page 3-163 is flawed.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS.
DR-MTDK-BL-	Travel Mngt	In the planning area of the DEIS I would submit that all of the uses described on page 3-163 require motorized access of roads to achieve enjoyment of these	n	Thank you for your comments and your concern. We appreciate the interest in management of public lands. While statements of opinion (including agreement

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
13-0058-12		<p>activities. You have not clearly identified the way people have historically accessed these lands for the activities listed. I request you address this discrepancy in your analysis to reflect how people really access these areas. The planning area is vast and without adequate access of roads, the planning area will become void of human activity.</p>		<p>or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS</p>
DR-MTDK-BL-13-0058-13	wildlife	<p>I am also astounded by the number of government jobs associated with the management of this area. Over 150 BLM jobs and the DEIS has little information gathered from these employees and incorporated into the DEIS. Most of the work on the DEIS was subcontracted and little if any ground truth information on bird or animal populations was provided by the BLM. Bird populations have skyrocketed in this area and now predator populations are following historic trends of increasing during times when the food source is increasing. Your analysis and conclusions are flawed in proposing that human presence and surface occupancy is the cause of possible Sage Grouse extinction. Clearly history shows that both food source and predator populations cycle historically. Low food source results in a die off of predators from starvation and the predator die off results in a slow increase of food source animal populations. The increase of food source animals, results in a slow increase of predator population, until the predators kill the food source and reach unsustainable levels and begin to die off because of lack of food source and this cycle continues and will continue through all of time. The DEIS fails to mention this important fact and I request the BLM include an analysis and science based information regarding trends in food source animal populations in comparison to predator populations.</p>	n	<p>Thank you for the comment. Predator control was not included as a threat in the FWS's listing decision; however, the BLM and the Forest Service acknowledge that localized predation may be a factor in the conservation of greater sage-grouse in some areas. In these areas, the states possess primary authority and responsibility for managing the wildlife within the state and the BLM and the Forest Service are responsible for managing habitat. Montana Fish, Wildlife and Parks manage wildlife within Montana, while the BLM and Forest Service focus on managing habitat. Consistent with a Memorandum of Understanding between the BLM and the US Department of Agriculture, Animal and Plant Health Inspection Service-Wildlife Services, the BLM and Forest Service will continue to work with Montana Fish, Wildlife and Parks to meet state wildlife population objectives. Predator control is allowed on BLM- and Forest Service-administered lands and is regulated by the MT FWP and Animal Plant and Health Inspection Service (APHIS). APHIS conducts environmental analyses in accordance with the National Environmental Policy Act (NEPA). The BLM and Forest Service will continue to work with agencies to address current predation of greater sage-grouse, and BLM and Forest Service-administered lands in the planning area will remain open to predator control under state laws. Additionally, the BLM and the Forest Service will continue to work with the involved states to meet state wildlife population objectives.</p> <p>While adding management actions specifically to manage predators is outside the scope of the amendment, the BLM and the Forest Service have authority to manage the habitat and have provided numerous management actions across the range of alternatives. Altering the sagebrush habitat of the greater sage-grouse can create an influx of predators into an area and lead to a population decline. Roads, fences, power lines, trails and other disturbances may make access easier for potential predators and increase risks to the species. The Draft EIS calls for measures that will substantially reduce disturbances in the bird's habitat, thus reducing predation risk. The Draft EIS also calls for careful monitoring of grazing allotments within sage-grouse nesting habitat to ensure suitable grass and forb cover is reserved so we can minimize the associated predation risks.</p> <p>In addition, predator control is described in "Management Common to all Alternatives", Table 2.6.1, page 2-69.</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
				BLM also has a Memorandum of Understanding (MOU) with APHIS –Wildlife Services (WS) that describes responsibilities of each of the agencies. WS is responsible for preparation of the NEPA documentation, annual Animal Damage Management Work Plan, and implementation. BLM cooperates with review and approval of their plans on public lands.
DR-MTDK-BL-13-0058-14	Social/Econ	The major problem with your use of the IMPLAN system is this system uses data and information from major urban areas and no information from small communities are gathered or included. Clearly the statement in the DEIS that "very small towns dependent on agriculture" shows your agency acknowledges the negative impact your decision will have on their communities but through the IMPLAN system this information and fact is lost. Take a hard look at these two statements and do further analysis on the impacts your decision will have as this directly relates to the environmental justice of the decision.	n	The IMPLAN data are comprehensive - it includes data from both metropolitan and non-metropolitan areas. It is neither feasible nor desirable to conduct economic impact analyses on very small scales (e.g., zip code level) due to the economic linkages between communities. A small-scale IMPLAN analysis would fail to capture the labor and trade flows between communities and the economic consequences would be underestimated. As a result, consequences particular to small communities are addressed in the social analysis. The social analysis addresses environmental justice considerations on pg. 4-590, which describe the potential for disproportionately adverse effects on low income individuals and communities.
DR-MTDK-BL-13-0058-15	Wildlife	On page 4-398 the DEIS states:" Because the long-term decline in wildlife habitat would continue under this alternative" The BLM has no sound science based information or facts to support this statement. The no action alternative must be attacked by your agency and seen as not acceptable in order for the BLM to justify changing management direction. Please take a hard look at this statement and provide me with the information and science used in your determination that this statement is true.	n	Thank you for your comment. This comment refers to the Miles City draft RMP/EIS, not the draft Billings and Pompeys Pillar National Monument RMP/EIS.
DR-MTDK-BL-13-0058-16	Recreation	4.3.3.3.11 states:" Recreation management actions, including designation not SRMAs and ERMAs, could result in land ownership adjustments " I question the direction of the BLM in making designations which would adversely affect private property ownership that would reduce the ability of a person to enjoy full use and expected return on their capital invested. This action could be viewed as a violation of one's constitutional rights of property ownership and would result in litigation brought against the BLM. 4.3.3.3.11 also states: "Proposed facilities, such as power lines, may need to be mitigated to minimize the impacts to recreational setting and experiences....." This could mean that because the BLM is putting high priority on non-motorized recreation, public facilities such as power line construction would be denied on the false basis of an adverse effect on non-motorized recreation. While power lines would not be adverse to motorized recreation and could actually enhance additional motorized recreation opportunities, the BLM would deny public benefit services on the basis of their possible effect on the BLM's preferred recreation activity. This action could be viewed as prejudice in nature and action. I request the BLM take a hard look at whether a preferred activity by employees of BLM, without consideration of science based information, would reflect a prejudice within the agency towards a particular segment of the population. This action would not be based on relative	n	Thank you for your comments. In regards to the statement regarding adverse impacts of BLM decisions on private property, all decisions have consequences. However; Please see FLPMA, the Code of Federal Regulations, etc. BLM is charged with managing these lands and is directed to develop this RMP. In regards to the specific comment on SRMA/ERMA designation, the BLM RMP has extensive discussions throughout the document regarding mitigating measures and nowhere does the text state or imply that public facilities or access to private lands would be denied solely on the basis of establishment (or not) of a Recreational Management Area designation. Please see FLPMA, the Code of Federal Regulations, BLM Recreation Management Manual, etc. Regarding the statement of closures of vast public lands tracts currently open for OHV use, please see the RMP for actual acreages closed

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		<p>facts and information but rather on emotion and prejudice. Multiple use recreation including motorized segments has increased by 156 percent in the last few years and provides substantial economic and social benefits. Ignoring this increased demand for access in the formulation of the Billings RMP would show complete disregard for the public needs. Vast areas of BLM land in the Billings RMP are targeted to be closed to the majority of Americans. Ignoring the facts of desired access opportunities in making the decision to close these public lands is completely contrary to the mission and goals of the BLM agency. This decision would be arbitrary and capricious in not considering the benefits of multiple use access for recreation, active forest management and responsible resource development.</p>		<p>Regarding the closure of large tracts of public land specifically due to the closure of access routes, please see the Travel Management sections throughout the RMP, Appendix O, and the associated Travel Management maps. No main access routes are closed. Routes that are closed have specific resource concerns, which are identified in the vehicle route inventories, available for review at the BLM office. Please see also BLM Manual 1626, Transportation and Travel Manual, for the process by which BLM manages its travel system.</p>
DR-MTDK-BL-13-0058-17	Social/econ	<p>3.32.2.3 states on page 3-249: "Oil and gas production in Montana is not subject to ad valorem, or property taxes; rather it is subject to production taxes". This statement ignores the fact that oil and gas producers do pay property taxes. Some of these taxes are Class 9, centrally accessed; and some are locally accessed as value based on Class 8, industrial personal property; or Class 4, real property; or Class 9, personal property; or Class 15, pipelines; or numerous other taxes including vehicle taxes, fuel taxes, etc. These oil and gas companies also employ thousands of people who also contribute to the overall local, county and state tax base through payment of property and income taxes. The IMPLAN system being used by BLM to estimate the economic impact of these businesses is flawed in the lack of adequate consideration of these additional contributions by the supporting businesses and employees in the taxes paid and this support for government services.</p>	N	<p>The IMPLAN data are comprehensive - it includes data from both metropolitan and non-metropolitan areas. It is neither feasible nor desirable to conduct economic impact analyses on very small scales (e.g., zip code level) due to the economic linkages between communities. A small-scale IMPLAN analysis would fail to capture the labor and trade flows between communities and the economic consequences would be underestimated. As a result, consequences particular to small communities are addressed in the social analysis. The social analysis addresses environmental justice considerations on pg. 4-590, which describe the potential for disproportionately adverse effects on low income individuals and communities. Previous modeling experience has shown that the data contained in the IMPLAN modeling system for the various sectors are accurate representations of impacts.)</p>
DR-MTDK-BL-13-0058-18	Travel Mngt	<p>4.3.3.3.14 states: "Upon completion, roads used for commercial and administrative access would be reclaimed, unless the route provides benefits for public access, which would be determined through subsequent analysis." This is concerning to CBU because of the previous statement above of possible prejudice within the BLM agency. It looks as though the BLM will obliterate road and trail facilities upon completion and decision of the RMP. Ripe, slash and seed contracts will be issued and infrastructure will be destroyed. The Billings RMP is lacking in specifics of road and trail identification as to properly inform the public on which facilities are to be closed. The statement that these facilities will be specifically addressed later on a case by case basis is clearly not true. There will be no effort made at a later date to address specific roads and trails when the current RMP document fails to identify these facilities. These access roads and trails are critical to the health, safety and welfare of the people in Montana and as such must have careful consideration before closing them. Local engagement in identifying these important facilities and the coordination between local governments and the BLM in the decision is critical. Clearly the BLM failed in coordinating with local governments as the DEIS does not list a</p>	n	<p>The RMP provides general direction. The Travel Plan is a separate document being prepared at the same time as the RMP, (it has a separate decision) and it clearly states that the Travel Management Areas (TMAs) would have individual implementation plans. These plans would address actions of this type. If additional routes are constructed (for whatever reason) through the life of the RMP, these would have individual and specific NEPA analysis.</p> <p>In regards to coordinating with local governments, please refer to the document for details of public and interagency coordination efforts which have been done.</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		single coordinating local government. A decision that ignores the required local government coordination is both arbitrary and capricious.		
DR-MTDK-BL-13-0058-19	Recreation, Social/Econ	3.32.2.4 states: "Nature-related recreation activities on BLM lands, e.g. fishing, hunting, and other wildlife related recreation use accounts for 30 percent of total use; non-motorized related recreation, e.g. backpacking, bicycling, camping, caving, hiking, horseback riding, photography, and picnicking account for about 60 percent, and motorized-related recreation, e.g. driving for pleasure and OHV use account for about 10 percent of total use." This statement is false, misleading and distorted to further an agenda within the agency. All of the listed non-motorized activities above require motorized access. The BLM lands subject to this decision are far removed and in most cases remote. Surveys show an average nonmotorized user travels 2 to 4 miles in their activity e.g. hiking, backpacking, etc. I request the BLM further analyze non-motorized use profiles in their analysis. Surveys also show that less than 3 percent of people recreate in wilderness areas which restrict all forms of motorized and mechanized use. More than 97 percent recreate in multiple use areas that allow motorized and mechanized use. This fact supports the need for multiple use roads and trails for people to enjoy the opportunities available on federally managed public lands. The belief and statement in the DEIS that non-motorized recreation accounts for "about 60 percent" is not supported by fact. Most use of public lands requires motorized transportation to access these areas. Motorized recreation is the most popular sport of leisure and the fastest growing activity. To ignore this fact and to distort the preferred recreation activity in the BLM RMP and CBU believes this misinformation presented in the RMP is clearly intentional on the part of the BLM ID Team. Prejudice against a particular social segment of the population is a violation of federal law as it relates to environmental injustice. Environmental injustice includes both social and economic impacts. Please consider revising the RMP to include the importance of motorized recreation opportunities and the importance of vehicle access to these lands for enjoyment of nonmotorized activities mentioned in the RMP. Refusal to take a hard look and include this analysis of the importance of motorized access and a correction of user percentages in the RMP will result in a decision that is both arbitrary and capricious.	n	<p>Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS.</p> <p>Please be aware that the BLM recently issued its Travel and Transportation Management Manual (BLM Manual 1626) which provided detailed policy, direction, and guidance for the BIFO staff to establish a comprehensive program for travel and transportation.</p> <p>The Manual is an interdisciplinary approach to travel and transportation planning and implementation guidance for management actions that addresses resource uses and associated access to public lands and waters, including motorized and non-motorized, mechanical and even animal powered modes of travel. The first section of this Manual lists all the applicable legal Authorities (FLPMA, Omnibus Public Land Management Act, NEPA, ESA, Antiquities Act, etc.) which BLM is required to follow and which the BIFO staff has adhered to in the development of the Travel Management Section decisions of the RMP.</p>
DR-MTDK-BL-13-0058-2	NEPA	Page 4-628 states that BLM lands are managed to "foster" multiple uses yet all of the alternatives including the preferred alternative propose to close large areas of BLM managed land to multiple uses. This action is contrary to the management propose and goals of the BLM agency.	N	<p>Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS. The BLM is required to manage the public lands on the basis of multiple use and sustained yield and to meet the needs of present and future generations. As the human population continues to increase and social values</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
				<p>evolve, resource conflicts are likely to increase. More importantly, the American public is increasingly aware of the importance of the public lands to its well-being and is demanding a larger voice in resource management decisions (H-1601-1). Land use plans ensure that the public lands are managed in accordance with the intent of Congress as stated in FLPMA (43 U.S.C. 1701 et seq.), under the principles of multiple use and sustained yield. As required by FLPMA and BLM policy, the public lands must be managed in a manner that protects the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archaeological values; that, where appropriate, will preserve and protect certain public lands in their natural condition; that will provide food and habitat for fish and wildlife and domestic animals; that will provide for outdoor recreation and human occupancy and use; and that recognizes the Nation's need for domestic sources of minerals, food, timber, and fiber from the public lands by encouraging collaboration and public participation throughout the planning process. Land use plans are one of the primary mechanisms for guiding BLM activities to achieve the mission and goals outlined in the Department of the Interior (DOI) Strategic Plan. (H-1601-1)</p>
DR-MTDK-BL-13-0058-20	Social/Econ	<p>3.32.2.4 also states on page 3-250: "This is less than one tenth of one percent of Yellowstone County employment and income." This reflects information and analysis done through the IMPLAN modeling. IMPLAN only uses information on economic impacts collected from large metropolitan areas and ignores the economic impact to small communities. The closure of large areas of BLM land to surface occupancy will devastate small towns and communities and this fact is being ignored. A reduction in Yellowstone County of less than one tenth of one percent does not reflect the direct impact to small towns dependent on federally managed public lands. Many times these small towns and communities depend on these public lands for the majority of their income and economic stability. Surveys conducted by CBU have shown that some small communities receive 60 percent of their income as a result of people using and enjoying these public lands. Not only hunters, fishermen, campers and others, these communities are highly dependent on these lands for continued agriculture operations and energy development. All these uses are highly dependent on both motorized access and surface occupancy. To analyze the economic effect of this decision based on only large populated areas and the effect on the economics of only these populated areas is clearly a lack on the part of BLM to provide a complete and factual picture of the effects this RMP will have on small communities. I request further analysis be done to address these deficiencies in the Billings RMP.</p>	N	<p>The IMPLAN data are comprehensive - it includes data from both metropolitan and non-metropolitan areas. It is neither feasible nor desirable to conduct economic impact analyses on very small scales (e.g., zip code level) due to the economic linkages between communities. A small-scale IMPLAN analysis would fail to capture the labor and trade flows between communities and the economic consequences would be underestimated. As a result, consequences particular to small communities are addressed in the social analysis. The social analysis addresses environmental justice considerations on pg. 4-590, which describe the potential for disproportionately adverse effects on low income individuals and communities.</p>
DR-MTDK-BL-13-0058-	Travel Mngt	<p>3.22 states on page 3-197: "ATVs and motorcycles" "increased by 156 percent from 1990 to 1998" and "OHV use is one of the fastest growing activities in Montana." The Billings RMP acknowledges the growth of this industry and yet</p>	N	<p>Thank you for your comment. We appreciate the interest in management of public lands. While statements of</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
21		<p>the RMP proposes to close much of the BLM managed land to this use. The decision should reflect the desire and preference of motorized use yet the BLM is ignoring these facts and putting forth instead an agenda driven decision. Our questions regarding this decision posed to the agency reveal the excuse and reasoning behind this plan as nothing more than their response to litigation on sage grouse listing. The BLM is being driven by court decision rather than best available science which are in direct conflict and violation of laws and regulation that guide this agency. If motorized recreation is increasing, and non-motorized is declining or stagnant, then why is the preferred alternative ignoring these facts unless the decision is indeed being driven by a litigation response rather than factual based information. The BLM has indicated they must restrict more land to access and surface occupancy and the analysis reflects only information to justify the decision rather than true, science based information that would contradict the reasons being used for closures. This is clearly an effort on the part of BLM to use selective science and information that supports a decision that the BLM has already made. The no action alternative would allow a growth of recreation opportunity, a growth of responsible energy development of benefit to people and communities, a growth of ability to actively manage these lands, but instead because of the preconceived agenda of closures, the BLM is only including analysis, science, and information in support of their decision. I request the BLM address this issue of predetermined outcome and analyze the possibility that this decision was predetermined and if the DEIS is truly an effort to engage the public or just a dog and pony show to comply with NEPA. In the eyes of CBU it is clearly the latter.</p>		<p>opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS. Regarding the closure of large tracts of public land specifically due to the closure of access routes, please see the Travel Management sections throughout the RMP, Appendix O, and the associated Travel Management maps. No main access routes are closed. Routes that are closed have specific resource concerns, which are identified in the vehicle route inventories, available for review at the BLM office. Please see also BLM Manual 1626, Transportation and Travel Manual, for the process by which BLM manages its travel system. Also refer to BLM's direction under the principles of "Multiple Use" and "Sustainability"</p>
DR-MTDK-BL-13-0058-22	Recreation	<p>Adequate recreational opportunity for all visitors is the supreme issue that must be addressed by this action. The relative importance of recreation on a national basis is demonstrated by the Bureau of Economic Analysis statistics for spending on recreation. In 1979 the index for recreation spending was 32.537 (year 2000 = 100.), http://www.bea.gov/national/nipaweb/TablePrint.asp?FirstYear=1979&LastYear=2004&Freq=Year&SelectedTable=33&ViewSeries=NO&Java=no&MaxValue=155.606&MaxChars=7&Request3Place=N&3Place=N&FromView=YES&Leq a1=Y&Land=In 2004, the index was 113.695 for an increase of 349%. No other sector has increased this dramatically. Clearly, the public wants and needs adequate recreational opportunity and this should be the overarching theme of this evaluation and decision. Many federal actions have led to the continual closure of motorized recreational opportunities and access while during this time the number of OHV recreationists has grown to 50 million and at the same time other outdoor activities have declined 18 to 25% (Journal of Environmental Management 80 (2006) 387-393.), http://www.redrockinstitute.org/uploads/PNAS.pdf and http://www.msnbc.ms</p>	n	<p>Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS.</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		n.com/id/22998037/		
DR-MTDK-BL-13-0058-23	Wildlife	Northeast Montana has the healthiest, most diverse grassland ecosystem in the world. We have so many sage grouse that the Montana Department of Fish, Wildlife & Parks is transplanting some of them to Canada. This region's sage grouse production is in good shape due to decades of cooperation between ranchers and the BLM. The DEIS must adequately acknowledge this condition. The DEIS is focused on habitat and reflects no acknowledgement of healthy Sage Grouse populations.	n	Thank you for your comment. Using long term averages of male counts on 20 leks from 1981-2007, the average male count was 672. The 2008 count was 19.5 percent below the long term average or about 542 males. (page 3-86, Billings RMP)
DR-MTDK-BL-13-0058-24	Travel Mngt	The 3-State OHV decision and National OHV rule require site-specific data and analysis to be used in any actions that could affect OHV recreation. It also required all OHV use to remain on designated trails. 3.22 on page 3-198 states: "Overall, a small percentage of the total recreational OHV use in the planning area occurs cross country, suggesting a low frequency of motorized wheeled cross country travel." This indicates a high compliance with the 3-state OHV Rule which is only briefly mentioned in the DEIS. Compliance with the rules and regulations by OHV users shows the willingness for these folks to help in the protection of the resource. Yet also in 3.22 on page 3-197 it states: "Limited and closed designations help protect natural resources and minimize conflicts among various public land users." This statement is made despite the statement made on page 3-198 which I referred to in the previous paragraph and also with no fact based information in the DEIS that refers to user conflict reports. The fact is that no resource damage occurs where motorized use remains on designated roads and trails and with no information in the DEIS being presented that shows user conflict, the BLM is making false statements. I request the BLM document user conflict and provide reports of user conflicts that are documented by names, dates, and places these user conflicts occurred.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS The request for documentation of user conflicts is beyond the scope of the RMP – it is a compliance issue. Please contact the BLM for the details on the process to acquire this information.
DR-MTDK-BL-13-0058-25	Travel Mngt	If the DEIS states there is little if any off trail and road riding that is occurring, then one would expect little if any resource damage has been experienced. With little if any specific road and trail evaluation being done prior to the DEIS being released it is reasonable to assume the BLM has absolutely no information to support the resource damage or user conflict statement. A decision based on little or no information would surely be considered to be arbitrary and capricious. I request the BLM take a hard look at the information used to make these statements and provide valid information to the public so as we can review this information and comment.	n	The BIFOI conducted an extensive route inventory These inventories also specifically noted evidence such as erosion scars which the BIFO then used in designating its route system. The Travel Management Appendix O provides an extensive impact analysis discussion on each of the Alternatives and their proposed route system segments.
DR-MTDK-BL-13-0058-26	Wildlife	Next in line affecting sage grouse populations are natural conditions including weather and fires and induced conditions such as wolves and predators. Sage grouse populations are significantly impacted by natural conditions including drought. The benchmark for evaluation of impacts on sage grouse by OHV recreation should be established by comparison to these natural conditions and hunting regulations. The evaluation and subsequent decision-making must be	n	Thank you for your comment. As natural conditions can have a major effect on wildlife habitat and populations, population trends were documented over a relatively long time-frame of 26 years within the Billings Field Office. "Mitigation Measures and Conservation Actions for Greater Sage-grouse Habitat" Appendix AA (section F) discusses measures for mitigating impacts from OHV, recreation, and other surface disturbing and disruptive activities.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		based on comparison to these real world conditions.		
DR-MTDK-BL-13-0058-27	Soils, recreation, wildlife	An adequate sense of magnitude must be employed within the analysis and decision-making. For example, the total naturally occurring loss of soil from the Cibola National Forest is estimated to be on the order of 1,577 acre-feet per year (1,892,000 acres total forest area times a depth of 0.008 feet of soil loss per year). The loss associated with OHV use is on the order of 52 acre-feet (5,200 acres of roads and trails times a depth of 0.01 feet of soil loss per year). Therefore, the soil erosion associated with OHV recreation is relatively insignificant compared to the naturally occurring erosion rate and acceptable for multiple-use lands. Moreover, there are many mitigation measures that can be employed to reduce soil erosion on roads and trails while still allowing the public to enjoy them. Other examples that should be part of the evaluation include the naturally occurring mortality rate of sage grouse compared to the mortality rate associated with OHV recreation. The evaluation and disclosure to the public must include the analysis and a comparison of the magnitude of OHV impacts to naturally occurring impacts for all resource areas used to assess impacts based on site-specific data. Lack of the comparison of impacts to naturally occurring levels combined with the lack of site-specific data could allow inaccurate statements and opinions due to the lack of an adequate sense of magnitude.	N	Thank your for your comment. We appreciate the interest in management of public lands. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS
DR-MTDK-BL-13-0058-28	wildlife	Examples of the popularity and magnitude of the lek viewing activity include: http://www.craigdailypress.com/news/2011/mar/01/local-environmental-groups-organizing-sage-grouse/ http://www.siskadee.org/view.htm http://www.gorp.com/parks-guide/travel-ta-birdwatching-la-junta-comanche-and-cimarronnationalgrasslands-golden-spike-national-historic-site-sidwcmdev055433.html http://coloradobirdingsociety.net16.net/zsbirdingspots.htm http://www.naturescapes.net/phpBB3/viewtopic.php?f=9&t=150579 http://gf.state.wy.us/wildlife/wildlife management/sagegrouse/index.asp http://www.blm.govinstc/library/pdf/TN424.pdf http://wildlife.state.co.us/Viewinq/Events/Festivals/PagesNiewingEvents.aspx http://billingsgazette.com/lifestyles/recreation/b1m-wgf-holds-sage-grouse-lekviewingtrip/article_d3f3abe0-d2ec-56b1-9eb9-3cfad0a1d561.html?print=1	n	Thank you for the comment.
DR-MTDK-BL-13-0058-29	Social/econ	Agriculture is the number one industry in Montana. Sage Grouse populations have flourished because of the benefit of agriculture to their habitat. These improvements include grains and seeds from agriculture production, water facilities and haystacks for feeding and cover. All these benefits must be recognized and the Sage Grouse strategy must include a cost benefit analysis of the restrictions or potential removal of agriculture on the landscape.	n	Opinion: Response: No text revision necessary (Thanks for the comment.
DR-MTDK-BL-13-0058-3	NEPA,	The CEQ has directed agencies to gather data from reliable sources such as interviews and information from local residents which the BLM has failed to do. I request your agency follow the CEQ requirement and gather more reliable information in completing the BLM RMP. Failure to gather true data on the social	N	Thank your for your comment.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		and economic impacts of this decision and to incorporate this information into the document would result in the decision being arbitrary and capricious.		
DR-MTDK-BL-13-0058-30	Social/econ, NEPA	Any removal of energy development opportunities must also consider the potential loss of job opportunities. Economic benefits from energy production to communities, counties and the state must be considered as required by both MEPA and NEPA. Social and economic analysis is critical. A strong social and economic environment is critical in preserving wildlife habitat and wildlife populations.	N	Opinion: Response: No text revision necessary (Thanks for the comment.
DR-MTDK-BL-13-0058-31	Wildlife	Private property rights must be protected and preserved. There should be no actions on the part of BLM to diminish private property rights in regards to Sage Grouse strategies proposed. Any proposed restrictions or regulations on land use must only apply to federally managed public land and must follow both MEPA and NEPA requirements in publication of proposed rules and in the consideration of public comments. Many times government agencies ignore the value of private property rights in their decision. CBU requests the BLM consider private property rights as vital to the survival of Sage Grouse and the protection of these rights to support the economies of local communities.	n	Thank you for your comment. Valid existing rights are protected in the document (pages 1-13, 16, 18).
DR-MTDK-BL-13-0058-32	NEPA	There are some recent developments in Montana which the BLM should be made aware of. These recent actions should be considered by the BLM as valid reasons to delay this action. Several people and organizations have requested an extension of the comment period on this action and with these latest actions by the Montana 63rd Legislature, I would request an extension on the comment period of all 3 BLM RMP proposals. The legislature passed and the governor signed HB 169. This will become law on October 1, 2013. HB 169 codifies in state law, Title 76, the use of a Growth Policy as the legal document a local county may use to coordinate with federal agencies on land planning action that affect their county. Most of the counties in Montana have growth policies including most if not all of the counties affected by the 3 BLM RMPs. In the list of participants in this proposal there are many cooperating and collaborating agencies but not one coordinating agency. Coordination is required by federal agencies if local governments wish to engage and have a resource plan in place. HB 169 makes the Growth Policy the legal document the county can use to coordinate. The BLM must contact all counties affected by these 3 RMPs and ask if they wish to coordinate. Failure to make this effort on the part of the BLM would be in violation of several federal laws and acts.	N	Thank you for your comment. Please see Chapter 4 for the environmental consequences and Section 1.5 for consistency between the Proposed RMP and county or local plans. This planning area contains habitat for Greater Sage-Grouse. When BLM announced the National Greater Sage-Grouse Planning Strategy in 2011, we emphasized that we would be working under a very restricted time schedule in order to meet the court-ordered deadline for the U.S. Fish and Wildlife Service to reach a final determination on listing the Greater Sage-Grouse under the Endangered Species Act (ESA). At that time, we laid out an ambitious schedule. We remain committed to maintaining that schedule. Given the critical and time-sensitive nature of planning issues related to Greater Sage-Grouse priority habitat, we feel we will be unable to extend the 90-day public comment period, which closes on June 28, 2013 for the Billings and Pompeys Pillar National Monument draft RMP/EIS. We recognize that much is at stake in the sagebrush habitat across the West, including energy development, recreation, livestock grazing and fire management. We will continue to incorporate the most current information we have available as we complete our planning document. We remain committed to implementing the right policies and conservation measures now that will reduce long-term regulatory burdens on our stakeholders and to addressing the threats posed to the species so we can, ideally, help eliminate the need to list the species under the ESA.

*Billings and Pompeys Pillar National Monument
Proposed Resource Management Plan and Final Environmental Impact Statement*

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
				<p>Throughout the development of the Billings and Pompeys Pillar National Monument draft RMP/EIS, the management team and specialists considered the public scoping comments as well as worked with the tribes, and the BLM's cooperating agencies and local Resource Advisory Councils. In an effort to facilitate public outreach for the release of the Billings and Pompeys Pillar National Monument draft RMP/EIS, we prepared a series of communication tools, including comprehensive websites, and fact sheets to complement the draft plan. Several public open houses were scheduled within the planning area for the public to attend at least one event.</p> <p>We will consider substantive and timely filed comments and respond to them in the Final EIS. All substantive comments received after the 90-day draft comment period and before a final decision is made will be considered to the extent feasible.</p> <p>Finally, our management staff and planning team leaders are available upon request for one-on-one briefings, and we encourage you to take advantage of that offer.</p>
DR-MTDK-BL-13-0058-33	Wildlife	The Governor of Montana has set up a task force to study the Sage Grouse issue and formulate a plan to enhance their habitat and range. This task force seems worthless and a waste of time if the BLM develops and implements a plan without first considering the outcome of the task force. People on this task force are more familiar with the landscape, the resources, the surface owners, the issues related to habitat and animal populations, local economies and economic drivers, and the DEIS states on page 4-414 : The mineral revenues distributed to the state would be reduced by approximately \$1 million." The \$1 million dollar reduction in revenue to the state of Montana is clearly an indication that the state has a very large stake in what the BLM does in their decision. For this reason the BLM should slow this process down and consider input into this plan from the recommendations of the task force set up by the Governor	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS.
DR-MTDK-BL-13-0058-34	NEPA	The 63rd Legislature passed SJ15 which is a study bill. This study will analyze the current management practices on federally managed public land in Montana during the interim and the possibility of changes to these management practices. The study will look at the relationship between federal land management agencies and the state of Montana. I believe it is premature for the BLM to complete the 3 BLM RMPs before the Montana Environment Quality Council (EQC) has a chance to complete their work in regards to SJ15. I request the BLM delay their decision until such time as the EQC provides recommendations to the BLM on the proposed plan and subsequent implementation of this plan. The first meeting of the EQC is scheduled for June 19-20, 2013.	N	Thank your for your comment.
DR-	Social/Econ	4.5.1.5 Environmental Justice states: "no alternative considered would result in	n	Editorial: Response: No text revision necessary (Thanks for the comment.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
MTDK-BL-13-0058-4		any identifiable disproportionate effects specific to any minority or low income population or community." This statement is false. The DEIS does not take a hard look at the impact this decision will have on small communities. Because the IMPLAN modeling system only uses large population areas for input data into the model, small communities of low income and limited economic diversity are not represented and no effort on the part of the BLM to adequately incorporate data from small communities was done. This lack of data from low income small communities is in violation of NEPA and consequently will result in a decision that is arbitrary and capricious.		Resource outputs are the amount of a resource (e.g., AUMs, recreation visits, tons of locatable minerals, etc.) that would be available for use under each alternative. Resource specialists projected annual resource outputs based on the best available information and professional judgment. Based upon public comments, resource specialists have reviewed assumptions used in this analysis to see if they need to be changed or updated. These revised assumptions have been incorporated into the analysis contained in the DEIS. The purpose of the economic analysis is to compare the relative impacts of the alternatives and should not be viewed as absolute economic values. Previous modeling experience has shown that the data contained in the IMPLAN modeling system for the various sectors are accurate representations of impacts.)
DR-MTDK-BL-13-0058-5	Social/econ	4.5.2.2 states: "While the alternatives have the potential to affect local businesses and individuals, the changes in BLM lands and minerals would not change enough to affect economic diversity or dependency." This statement would only be true if your analysis were to use economic data from a modeling program that relies on information and data collected from large communities with a diversity of economic drivers. The IMPLAN modeling system only uses data from the larger communities and therefore ignores the impact to small communities. The DEIS lacks sufficient information from small communities in the analysis and because the small community data is missing, the DEIS document is flawed in its assumption of no impact	N	The IMPLAN data are comprehensive - it includes data from both metropolitan and non-metropolitan areas. It is neither feasible nor desirable to conduct economic impact analyses on very small scales (e.g., zip code level) due to the economic linkages between communities. A small-scale IMPLAN analysis would fail to capture the labor and trade flows between communities and the economic consequences would be underestimated. As a result, consequences particular to small communities are addressed in the social analysis. The social analysis addresses environmental justice considerations on pg. 4-590, which describe the potential for disproportionately adverse effects on low income individuals and communities.
DR-MTDK-BL-13-0058-6	Social/Econ	The DEIS on page 4-600 refers to a study by Rasker, Alexander, venden Noort and Carter as to the benefit of open space. This study is flawed by the incomplete and excluded data which was not used in this study. The study is not definitive and was done in response to increased subdivision activity in high density areas of western Montana. Rasker is the founder of Headwaters Economics and works with and for environmental groups to stop residential development. He was the executive director of Sonoran Institute, an environmental group well known for their attacks on private property rights. Headwaters Economics has a desired outcome and through this agenda they input incomplete and many times false data in an effort to reach a predetermined outcome. Any reference to this study in justification of your decision renders the decision arbitrary and capricious.	N	Opinion: Response: No text revision necessary (Thanks for the comment.
DR-MTDK-BL-13-0058-7	Social/Econ	The DEIS makes reference to some people would be adversely affected by the decision while others would benefit. The people mentioned that would benefit would not benefit directly or economically but would benefit by their desires and feelings being enhanced. The folks dependent on multiple use management of these lands for income and continued operation of their business would suffer while the feelings of some would be enhanced. Is it within the expertise of the BLM to analyze the mental feelings of people in order to determine their mental	n	Opinion: Response: No text revision necessary (Thanks for the comment. Resource outputs are the amount of a resource (e.g., AUMs, recreation visits, tons of locatable minerals, etc.) that would be available for use under each alternative. Resource specialists projected annual resource outputs based on the best available information and professional judgment. Based upon public comments, resource specialists have reviewed assumptions used in this analysis to see if they need to be changed or updated. These revised

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		state of accepting a decision? The DEIS does not supply any supporting documentation relative to mental feelings arising from selection of any alternate. The BLM is assuming without science based information or studies resulting in a decision that is both arbitrary and capricious.		assumptions have been incorporated into the analysis contained in the DEIS. The purpose of the economic analysis is to compare the relative impacts of the alternatives and should not be viewed as absolute economic values. Previous modeling experience has shown that the data contained in the IMPLAN modeling system for the various sectors are accurate representations of impacts.)
DR-MTDK-BL-13-0058-8	Travel Mngt	4.5.1.8 makes the following statement which is quite concerning. "Recreation management under Alternative D would enhance experiences for people who prefer non-motorized opportunities while maintaining quality opportunities for those desiring a motorized experience, which could enhance the quality of life for both of these groups." This statement is completely false. Closure of large areas and many trails currently open to motorized use would adversely affect both motorized and non-motorized users. Your assumption of benefit is clearly flawed. Because access to BLM managed land depends on people being able to access these lands, any removal of established roads would adversely affect all users. People are not going to walk from Billings to the public lands. People are not going to walk large distances across BLM managed land to access their preferred destination. Opportunities for nonmotorized recreation are enhanced by the motorized road and trail facilities. Removal or closure of any of these facilities will adversely affect everyone.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS.
DR-MTDK-BL-13-0058-9	Travel Mngt	In regard to the road and trail facilities, the DEIS is not sufficient in conveying to the public a clear picture of what roads and trails are proposed to be closed or remain open. The maps associated with the DEIS do not indicate road and trail numbers which are necessary for the public to provide substantive comments on specific roads and trails. The large maps provided to the public did not have the road and trail numbers associated with them. The maps provided on the computer website were not able to be copied and enlarged to provide the required information to the public as required by NEPA. When BLM representatives were asked about the lack of road and trail identification at the open house events we were told these maps were "a work in progress". How can the BLM expect the public to make an intelligent comment or even comment at all on the closure or use of a specific road or trail if these facilities are not identified on the map provided to the public? I request the comment period be extended until such time as adequate information is provided to the public in the form of maps with roads and trails identified with their corresponding numbers. A record of decision to implement the BLM RMP before this information is provided is contrary to the requirements of NEPA and would be in violation of NEPA. Such a decision would be both arbitrary and capricious.	n	Thank you for your comments and your concern. We appreciate the interest in management of public lands. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS. The Maps have route numbers on them and Appendix O has detailed explanations of the inventory and designation process. Individual route inventory data is also available for the public.
DR-MTDK-BL-13-0065-1	lands with wilderness characteristi	Manage AS WILDERNESS: > > 1. Weatherman Draw > 2. Bad Canyon > 3. Yellowstone River Islands > 4. Clarks Fork River Islands >	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office

*Billings and Pompeys Pillar National Monument
Proposed Resource Management Plan and Final Environmental Impact Statement*

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
	cs			and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS
DR-MTDK-BL-13-0065-2	Travel Mngt	1. Close Demijohn Flat route (Pryor Mtns) to motorized use > 2. Close the Bear Canyon (Pryor Mtns) road to motorized use > 3. Keep Graham Trail for foot and horse travel only >	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS. Several changes have been made to the final RMP, which includes closing Bear Canyon And Demi John Flats to motorized use except for administrative needs. Refer to map 146
DR-MTDK-BL-13-0067-1	PMWHR, Recreation	Do not allow target shooting on the mountain top area should be prohibited year round in the entire PMWHR. It can cause undue stress to the wild horses and other wildlife. Target shooting can increase the risk for a wild fire. Target shooting could result in an accidental horse shooting and is an endangerment to the other visitors on the mountain.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS. Please note that on page 2-172 safety is noted as a specific concern and that the closure is only during the period of peak visitation and only in the area where people and horses congregate in close proximity with a potential for both vegetation and topography screening.
DR-MTDK-BL-13-0067-2	WILD HORSES, PMWHR	Reintroduce the Sorenson Extension into the horse range	N	Thank you for your comment.
DR-MTDK-BL-13-0068-1	Travel Mngt	Bear Canyon Trail and all beyond the entrance should be closed to motorized traffic.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS In regards to the Bear Canyon route, the RMP has a range of possible decisions. In this case, due to the conditions you mentioned the Alternative D has been modified to reflect the current conditions. The route will be designated as "closed to motorized use" to the public with motorized administrative access for Agency staff. Refer to map 146
DR-MTDK-BL-13-0069-1	lands with wilderness characteristics	I urge that wilderness management be applied to Weatherman Draw (exceptional cultural values), Bad Canyon, and all BLM-administered islands in the Clark's Fork and Yellowstone Rivers.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS Please see the end of Table 2.6.1 for Lands with Wilderness Characteristics

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
				management prescriptions and then refer to other sections in the table for the specific areas and their management prescriptions – many have the same regardless of designation
DR-MTDK-BL-13-0069-2	Cultural, lands with wilderness characteristics	I strongly support the following specific motorized closures: 1) the Demijohn Flat route in the Pryors in order to protect sensitive cultural values. This 1-1/2 mile closed route would be wonderful quiet trail and would also unify the Burnt Timber Canyon WSA with contiguous lands identified by BLM as possessing wilderness characteristics. 2) the two-track route leading into Bear Canyon in the Pryors beyond the canyon mouth. With two parallel motorized routes nearby and a third proposed (Graham Trail) a quiet non-motorized trail is needed.	n	<p>Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS</p> <p>In regards to the Bear Canyon route, the RMP has a range of possible decisions. In this case, due to the conditions you mentioned the Alternative D has been modified to reflect the current conditions. The route will be designated as “closed” to vehicle use and as a non-motorized trail. Refer to map 146</p> <p>Also note that BLM Manual 1626 (Travel and Transportation) specifies that BLM establish a comprehensive program for both motorized and non-motorized travel. This will be done in this RMP</p> <p>Please note that the goal for the Pryor Mtn TMA is to protect wilderness values, cultural assets, visual characteristics, sensitive plants, fragile and erosive soils, wild horses and wild horse habitat. Also note that BLM Manual 1626 (Travel and Transportation) specifies that BLM establish a comprehensive program for both motorized and non-motorized travel. This will be done in this RMP.</p>
DR-MTDK-BL-13-0076-1	Travel Mngt	Myself and several friends along with landowners have property within the Grove Creek TMA know as Block COS936, While looking at the proposals that are currently being listed I am very concerned that the BLM is supporting (D). This proposal (D) has the most effect not only on myself as a land owner but also ranchers, homeowners, public recreation, and 15 other landowners in the Beartooth Valley Ranch group. By supporting (D) the BLM and Planners are taking away our rights as US citizens to access our land. Also this (D) proposal will take away from all citizens the opportunity to access the recreational area. Many people use the area for hiking, hunting, camping, ranch land, and many other legal use. The Carbon County Commission has adopted thru legal means (1987) 25 years ago thru commission meeting the roads of Robertson Draw and Ruby Creek. This action is in the records of the Carbon County Commission. Robertson Draw and Ruby Creek were taken over by Carbon County so that the public (US citizens) have the access to the area for recreational purpose but also for landowner access and use. You will find on the Carbon County web site under county road priority maintenance that the county has claimed Robertson	N	<p>Thank you for your comment.</p> <p>Your comments have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS. Please know that BLM does not establish route determinations on private lands and can only make route determinations on BLM managed roads located on public lands.</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		<p>Draw Road as a Priority 1 with regular scheduled maintenance and snow plowing. With Carbon County being the source for road maintenance and having legally claimed Robertson Draw and Ruby Creek as county roads closing off any access cannot be an option as in proposal (D). The closing of Robertson Draw Road will firmly go against the Alaska National Interest Lands Conservation Act (Public Law 96-487-DEC 2. 1980 94 STAT 2371 110(B) giving US Citizens the guaranteed access to private owned land thru and across federal land. This not only Public Law but Federal Law also. As a US Citizen and owner of public lands have the right to access thru nominal and reasonable actions the access to my private land. The BLM Proposal (D) denies me of this right as a landowner. A reasonable action will be to have the Carbon County Road remain open as a public road as the wishes of the 1987 Carbon County Commission.</p>		
DR-MTDK-BL-13-0078-1	Travel Mngt	<p>It is also a very small task to include the impacts to private property owners in the adverse consequences of the Travel Management Plans and in each alternative as it also relates to Land Realty and ROWS. These private property owners in the Robertson Draw, Ruby and Gold Creek subdivisions are a unique group of people who have been given absolutely no consideration in this planning process. We are recommending that private property owners deserve to be notified of these above concerns with a form letter explaining how their rights to own property in this unusual situation will be negatively impacted and specific recommendations as to how they might compensate for this sudden threat of no motorized vehicle access and ROW exclusion, and full disclosure made of the known and perceived future threats to their rights to own private property in these unique areas, so that these informed people will have had ample opportunity to decide how to proceed to minimize their unforeseen social and economic losses.</p>	N	<p>Thank you for your comment. Due to the concerns raised in the Grove Creek area, the BLM attended an additional meeting with those interested publics in Belfry on June 22, 2013.</p>
DR-MTDK-BL-13-0080-FLA-Master-1	Social/econ	<p>I believe the BLM has underestimated the cost of hampering energy development in my state while overestimating the social benefits of blocking human activity on expansive tracks of land for the sage-grouse. We are still struggling in a weak economy. Chocking off oil and natural gas development would not only hurt the wages and employment prospects of the workers in that industry, but it would also drain money out of local communities. Decelerating the economic development of such an important industry would have an overall effect of reducing wages, employment, and entrepreneurship across all other industries within the region. Limiting the supply of energy can make electricity generation more expensive and therefore increases the utility costs and financial burdens on all Montanan households, families, and businesses. The intangible social benefits of freezing land use for a bird are highly questionable when compared to the costs of distorting economic decisions and outcomes for American families and businesses. I urge you not to adopt the preferred resource management proposal and keep Montana land open for productive</p>	N	<p>Opinion: Response: No text revision necessary (Thanks for the comment.</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		use.		
DR-MTDK-BL-13-0082-1	lands with wilderness characteristics	To properly protect and manage the 12 areas that have wilderness characteristics the following needs to happen:-Close all identified wild lands to mining and construction of new roads or new structures-Closing the areas to oil and gas leasing-Designate the areas where R/W for power lines & pipelines are excluded, this includes wind farms-Close the Demi John Flat route to motorized use-Close the two-track leading into Bear Canyon to motorized use-Designate quiet, non-motorized trails as part of the plan-Close all Sage Grouse Priority Protection Areas to oil & gas leasing Thanks for keeping Montana's Prairie and Plainses water, air and wildlife intact.	Y	<p>Thank you for your comment.</p> <p>While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS</p> <p>In regards to the Bear Canyon route, the RMP has a range of possible decisions. In this case, due to the conditions you mentioned the Alternative D has been modified to reflect the current conditions. The route will be designated as "closed" Refer to page ***</p> <p>Also note that BLM Manual 1626 (Travel and Transportation) specifies that BLM establish a comprehensive program for both motorized and non-motorized travel. This will be done in this RMP.</p>
DR-MTDK-BL-13-0083-1	NEPA	The position of Prairie County is that BLM should manage the properties assigned to them with "multiple use" directive of FLPMA of 1976. In your DRMPs you should have addressed all Environmental Issues for not just Ecosystems, but also Economics, Heritage, History, etc. Environmental Consequences of the Draft(s) RMP/EIS never even addressed these issues.	N	<p>Thank you for your comment.</p> <p>The BLM's multiple-use mission and the BLM's obligation to comply with the Federal Land Policy and Management Act of 1976 (FLPMA) and all other applicable laws, regulations and policies are addressed in Chapter 1 of the RMP/EIS.</p> <p>The topics referenced are discussed in the Cultural Resources, Economic, and Social sections of Chapters 3 and 4 of the RMP/EIS.</p>
DR-MTDK-BL-13-0084-1	Livestock Grazing	Allotments in Greater - Sage Grouse Habitat areas or area that leks or nesting are found would be more restrictive for use of "Cooperative Range Improvement" dollars that come from the Range Improvement Fund which is generated from Permit fees of livestock AUMs; which they, the permittees, are contributors. That being said, it is discriminatory against permittees that have allotments within Greater - Sage Grouse area(s) because of severe restrictions on putting in REA, Windmills, Fences, etc. ... that USFWS concluded are detrimental to the bird in question's habitat. Since those allotment holders do not have the same opportunity to use the Range Improvement Funds, how is the BLM going to compensate for the discrimination?	n	None of the alternatives discuss or contemplate avoiding range improvements on grazing allotments within greater sage grouse PPH. On Table 2-6.2 (pg. 2-116 of the DRMP) under management common to all alternatives "Structural range improvements would be considered where necessary to facilitate changes in grazing management changes." Additionally, in said table on pg. 2-118 of the DRMP under alternatives B and D, allotments within or containing Sage-Grouse PHMAs would be designated as Category I or improve. Under this designation, BLM would be able to channel more of the range improvement funds towards these allotments to improve management practices. Therefore this would not be discriminatory.
DR-MTDK-BL-13-0086-1	Livestock Grazing	Allotments in Greater - Sage Grouse Habitat areas or area that leks or nesting are found would be more restrictive for use of "Cooperative Range Improvement" dollars that come from the Range Improvement Fund which is generated from Permit fees of livestock AUMs; which they, the permittees, are contributors. That being said, it is discriminatory against permittees that have	n	On Table 2-6.2 of the DRMP under management common to all alternatives "Structural range improvements would be considered where necessary to facilitate changes in grazing management changes." Additionally, in said table on pg. 2-118 under alternatives B and D, allotments within or containing Sage-Grouse PHMAs would be designated as Category I or improve. Under this

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		allotments within Greater - Sage Grouse area(s) because of severe restrictions on putting in improvements: REA, Windmills, Fences, pipelines, etc. ... that USFWS and BLM concluded are detrimental to the bird in question's habitat. This in turn could be detrimental to the allotment passing all standards. Since those allotment holders do not have the same opportunity to use the Range Improvement Funds (under the same guidelines), how is the BLM going to compensate for the discrimination? If the management of BLM then decides that they should be more lenient to the use of range improvement funds on allotments within Greater - Sage Grouse Habitat, then does that not put the permittee not in Greater - Sage Grouse Habitat to a disadvantage?		designation, BLM would be able to channel more of the range improvement funds towards these allotments to improve management practices. By policy, the BLM has prioritized investments in range improvements since 1987 when the allotment categorization process was started with the issuance of BLM Manual Handbook 1740-1. As conditions and information changes, allotment categories may change under alternatives B and D—see page 2-118 of the DRMP.
DR-MTDK-BL-13-0087-1	NEPA	Prairie County is notifying the BLM now, that any changes after Record of Decision must first be addressed with the our county. Even if these modification(s) happen outside our jurisdictional boundaries, Prairie County realizes that the impacts of intensity and change of use of federal land affects can cross county lines as well and BLM district lines. We expect a detailed EIS and a statement of Environmental Consequences.	N	Thank your for your comment. Prairie County has been added to the B&PPNM RMP/EIS mailing list.
DR-MTDK-BL-13-0088-1	Wildlife	There is only one conclusion to increasing GSG populations: "Greater-Sage Grouse will adapt and flourish in about any part of eastern Montana or western North Dakota with aggressive predator control."	n	Thank you for your comment. The BLM and the Forest Service describe the effects of predation on sage-grouse in the Draft EIS; the information used here and in the affected environment was taken from the Baseline Environmental Report (the BER) and note that [summarize what the discussion was, specifically noting any reference the commenters make to an particular issue or topic; include page number references from the BER]. The BLM and the Forest Service have authority to manage the habitat and have provided analysis to describe how the numerous management actions across the range of alternatives could affect the habitat and indirectly the effects of predation. Altering the sagebrush habitat of the greater sage-grouse can create an influx of predators into an area and lead to a population decline. Roads, fences, power lines, trails and other disturbances may make access easier for potential predators and increase risks to the species. The Draft EIS calls for measures that will substantially reduce disturbances in the bird's habitat, thus reducing predation risk. The Draft EIS also calls for careful monitoring of grazing allotments within sage-grouse nesting habitat to ensure suitable grass and forb cover is reserved so we can minimize the associated predation risks. This information can be found in Chapter 3 - Wildlife of the EIS.
DR-MTDK-BL-13-0091-2	NEPA	40 CFR 1502.16 (CEQ)[The environmental consequences section of the EIS] shall include discussions of...(c) Possible conflicts between the proposed action and the objectives of Federal, regional, State, and local (and in the case of a reservation, Indian tribe) land use plans, policies and controls for the area concerned.40 CFR 1506.2 (CEQ)	N	Thank you for your comment. Please see Chapter 4 for the environmental consequences and Section 1.5 for identification of inconsistencies between the Proposed RMP and county or local plans.
DR-MTDK-BL-	NEPA	To better integrate environmental impact statements into state and local planning processes, statements shall discuss any inconsistency of a proposed	N	Thank your for your comment.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
13-0091-3		action with any approved state or local plan or laws (whether or not federally sanctioned). Where an inconsistency exists, the statement should describe the extent to which the agency's would reconcile its proposed action with the plan or law		
DR-MTDK-BL-13-0095-5	Livestock Grazing, Social/Econ	Furthermore, Range Improvement Funds used for Cooperative Range Improvements would be discriminatory against those ranchers and permittees in Greater - Sage Grouse Habitat because they can't use them for as broad a spectrum as those outside. This is not right. By taking away those tools, you also affected the economics of my county, other counties, and surrounding business hubs. The local contractors, hardware stores, well drillers and repairman etc. You have affected the amount of taxes paid to the state and feds. You have affected the local tax burden due to possible lower yearly income. None of this was even considered in your "Environmental Consequences" section.	n	<p>None of the alternatives discuss or contemplate avoiding range improvements on grazing allotments within greater sage grouse PPH. On Table 2-6.2 (pg. 2-116) under management common to all alternatives "Structural range improvements would be considered where necessary to facilitate changes in grazing management changes." Additionally, in said table on pg. 2-118 under alternatives B and D, allotments within or containing Sage-Grouse PHMAs would be designated as Category I or improve. Under this designation, BLM would be able to channel more of the range improvement funds towards these allotments to improve management practices.</p> <p>Please see the economics section regarding response to your economics comment. See the description of social, economic and environmental justice conditions and trends on pages ... and the description of social, economic and environmental justice impacts on pages ...which describes changes in employment, income, in various private sectors and changes to social conditions; table ...(...)shows impacts to public revenues to state and counties. Discussion on effects to local governments and community infrastructure have been added to the FEIS. In addition an appendix has been added to the FEIS describing the IMPLAN modelling tool and inputs used.</p>
DR-MTDK-BL-13-0102-1	WILD HORSES, PMWHR	1) Under Alternative D: It states "Manage wild horses on approximately 27,094 acres of BLM administered lands (39,994 acres all ownerships). Designate the closed portions of the Herd Area known as the Administrative Pastures to be included in the Herd Management Area. Due to private property conflicts, the - "buffer" area would remain closed. "I am extremely pleased that the "Administrative Pastures" idea is being seriously considered, and urge those concerned to pursue the accomplishment of that with vigor. However, I am under the impression that there have not been a lot of "private property conflicts", other than the case of Exhilaration's propensity to mix with domestic horses (which has been corrected), to necessitate reducing the area available for forage even by that encompassed in the "buffer" area. I feel that since ranchers are allowed to drive cattle across the Range when needed, and since cattle sometimes stray onto the Range by mistake from time to time, having an isolated incident or two with the wild horses really shouldn't constitute a serious problem. Therefore, I'd like to see that particular subject in Alternative D changed to the wording from both Alternatives C and D, as follows: "Manage wild horses on approximately 28,622 acres of BLM-administered lands (44,855 acres all ownerships). Designate the closed portions of the Herd Area known as the Administrative Pastures to be	N	<p>Thank you for your comment. Please refer to chapter two alternatives C and D as what is being called the buffer; it is not the administrative pasture, but rather the area between the county road and the external boundary fence.</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		included in the Herd Management Area. Designate the entire Herd Area as the Herd Management Area". However, if having the "buffer" area issue prevent the use of the rest of the Administrative Pasture area for the horses, I would, of course, want to compromise on that point.		
DR-MTDK-BL-13-0102-2	WILD HORSES, PMWHR	2) Under Alternative D: It states, Same as Alternative A-"Within an HMAP, herd structure would be managed for all representation in the herd, not allowing specific colors or bloodlines to dominate from management manipulation." It was the fact that these horses carried very "old bloodline" genes and the majority in this herd exhibited those unique characteristics, along with the varied beauty and ruggedness of the terrain, that drew me to begin visiting the PMWHR instead of any of the other places where one can see "wild horses". As I learned more about it, I had to applaud the efforts of the people who recognized the historical as well as esthetic beauty and importance of these horses and their ancestry---REALLY, applaud them. I recognize that it hasn't been easy. I've been a supporter of retaining as much of our historical connections in this country of ours as is possible, and this herd of horses and the range they live on have a prominent place on my list of important places and things (comparable to "old-growth trees" in our national forests). Therefore, I naturally believe that it is VITAL that the more primitive colors (dun/grulla/grullo) be considered the most important factor, second ONLY to genetic viability, in managing the herd. As a horse lover, as well, I do love ALL the horses, but my instincts tell me that there are many "pretty" horse colors everywhere and in many different breeds---such as pintos, palominos and roans, but the variety of duns, grullas and grullos hold a special place in the nature of this breed, and this herd, and should be especially treasured. So, in conclusion on this issue, I prefer that Alternative D be altered to include wording from C on this subject, and more descriptive language about primitive markings, to read as follows: "Within an HMAP, herd structure would be managed first for genetic viability, and secondly for and to promote the public perception of the quintessential Pryor horse that is Dun or Grulla/Grullo with any variation of primitive markings" i.e., dorsal stripes, leg stripes, wither stripes, black-rimmed ears, twotone manes/tails or the "webbing" on the faces of "coyote duns".	N	Thank you for your comment, however detailed objectives are addressed within implementation level documents such as Herd Management Area Plans
DR-MTDK-BL-13-0103-1	Travel Mngt	ALL Big Sky Trail and Bear Canyon Trail must be designated as nonmotorized: both are premier birding and mediation trails and the disturbance, disruption and intrusion of machinery is unacceptable.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS In regards to the Bear Canyon route, the RMP has a range of possible decisions. In this case, due to the conditions you mentioned the Alternative D has been modified to reflect the current conditions. The route will be designated

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				as "closed" for public use as a motorized trail and will be designated as a none-motorized trail. Refer to map 146
DR-MTDK-BL-13-0103-2	Cultural, Travel Mngt	The route from Crooked Creek Road to Demijohn Flat needlessly fractures culturally two sensitive areas: the Burnt Timber Canyon WSA and the Burnt Timber Canyon LWC.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS
DR-MTDK-BL-13-0103-3	Travel Mngt	How many motorized trails (within three miles!) are necessary on the SW slope of Big Pryor Mountain? Surely Bear Canyon Trail (beyond the canyon's mouth) can be spared: it's an Audubon Important Bird Area, the best place in the Pryors to see avian species	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS In regards to the Bear Canyon route, the RMP has a range of possible decisions. In this case, due to the conditions you mentioned the Alternative D has been modified to reflect the current conditions. The route will be designated as "closed" Refer to map 146
DR-MTDK-BL-13-0105-1	SS Plants, ACEC	In the draft RMP page E-28, ACEC Nomination Evaluation for the Pryor Foothills RNA/ACEC, it states that, "The area contains sites of seven bureau sensitive plant species." I can locate only six sensitive species within the proposed ACEC. All references are to the proposed Alternative D that is basically four sections. Which plant(s) does BLM list that I do not? Could my list and BLM's list of sensitive plants within the proposed ACEC differ in other ways? Though not critical for making comments on the draft RMP, it is important that we start out with the same list of sensitive plants to be conserved by the proposed ACEC. I am sharing my observations and findings about the proposed ACEC with Peter Lesica. I am assuming that the only survey for sensitive plants within the boundaries of the proposed ACEC was done by Peter Lesica and Peter Achuff in May and June, 1991. My list below is based on the data presented in their final report made to BLM in 1992. The list of plants in the table is taken from the Montana Native Plant Society's South Pryors Important Plant Area list. I have compared that list with the list of BLM sensitive plants. My copy of that list dates to 2009. I acknowledge the differences. In the appendix of their report Lesica and Achuff gave the locations of the plants by township, section, and quarter section. I used that data to determine which plants were located within the four sections of the proposed ACEC. Of the eleven recommended sensitive plants found in Townships T9S R26E and T9S R27E in 1991 by Lesica and Achuff, six were located in the proposed RNA/ACEC Alt. D. Species of Concern found in the Montana Native Plant Society's South Pryor Important Plant Area [Table	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS. Please refer to Appendix E. Areas Of Critical Environmental Concern in the Draft RMP/EIS for a discussion of ACEC Nominations for East Pryor ACEC (BLM nomination), Pryor Foothills Research Natural Area/ACEC (public nomination), and Sykes Ridge Rare Plant ACEC (nomination by Peter Lesica). Please see the 1998 ACEC Assessment and Proposed amendment to the Billings, Powder River and South Dakota RMPs here: http://www.blm.gov/style/medialib/blm/mt/blm_programs/planning/billings_rmp/amendments.Par.94086.File.dat/acecEA.pdf pages 74-76 are the nominations evaluations for the Billings RMP and page 103 shows the map of the nominated vs. recommended ACEC.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		<p>1]Name/Present in T9S R26E and T9S R27E west of Crooked Creek/Present in proposed RNA/ACEC Alternative D Astragalus aretioides N N Astragalus geyeri Yes Yes Astragalus oregonus Yes Yes Boechera demissa Yes N Camissonia andina Yes N Camissonia parvula N N Cleome lutea N N Erigeron allicotus Yes N Eriogonum salsuginosum Yes N Grayia spinosa Yes Yes Leptodactylon caespitosum Yes N Malacothrix torreyi Yes Yes Mentzelia pumila Yes Yes Nama densum Yes N Penstemon caryi N N Physaria lesicii N N Shoshonea pulvinata N N Stipa lettermanii N N Sullivantia hapemanii N N Townsendia spathulata Yes Yes Townsendia spathulata Was removed from the SOC list. The species' viability in the state does not appear to be at risk due in part to its relatively widespread distribution in southwest and south-central Montana and its overall abundance. Eriogonum salsuginosum was not found within the boundaries of the proposed ACEC, but based on its description it may turn up in the proposed ACEC. SOC Present in T9S R26E, T9S R27E west of Crooked Creek but not found in the proposed Pryor Foothills RNA/ACEC, Alternative D. Based on Lesica and Achuff, 1992. [Table 2]Boechera demissa Lesica found in the foothills of the Pryor Mtns and in BCNRA in canyon bottoms and outwash plains with Juniperus osteosperma. Reported 1998. Camissonia andina One site in R26E, others are east of Crooked Creek. Erigeron allicotus At 4000 -"6200 feet with Cercocarpus ledifolius. All sites are east of Crooked Creek. Eriogonum salsuginosum One site in R26E. Another location is near bentonite deposits. Look for in the proposed RNA/ACEC. Leptodactylon caespitosum North and east facing slopes of Chugwater sandstone in which gypsum is embedded. Locations appear to be east of Crooked Creek.</p>		
DR-MTDK-BL-13-0107-1	Travel Mngt	<p>A major concern regards the road that connects Robertson Draw Road to Ruby Creek Road, marked on the attached maps as "connector". This route provides essential access to block 936 and should not be closed to public use as currently proposed in alternative D. This route must remain open to avoid future conflicts with as many as 16 lot owners on block 936. Another concern regards existing vehicle access to my lot. This is shown on the attached Google Earth imagery from 2009; a field check to the area will confirm the viability and existence of this route as well. This road has likely existed for multiple generations. Indeed, the southwest corner of my property has a gate which predates subdivision and likely served necessary ranch functions, just as it should continue to offer access for me. The gate is the dividing line between public and private land and is fenced perpendicularly from the gate to the east and north. In assessing the Grove Creek TMA in the RMP, BLM should include this 500 foot piece of unimproved route as a publicly open route. This is consistent with the access rights of previous land owners, and it should remain accessible by current landowners, granted no improvements are required, which they are not.</p>	n	<p>Thank you for your comments. In reviewing the circumstances of this issue, it appears that neither the Ruby Creek road (GC 1003) nor the mentioned connector route (GC 1009 and GC 1010 route segments) actually provide access to the private property parcels. There are a number of other minor vehicle routes apparent from aerial analysis but the 500 foot long route mentioned has been considered and documented as an unauthorized route in previous correspondence between you and the BLM.</p>
DR-	Travel Mngt	In addition, lot #5 has similar access which can be also be seen on the attached	n	Thank you for your comments. In reviewing the circumstances of this issue, it

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
MTDK-BL-13-0107-2		maps. That spur route accesses a water tank (labeled as "RI" for range improvement on the map) which is fed by an up gradient spring. This route is well traveled yet also does not appear on any of the DRMP maps. This route adjoins with the private easements on block 936 which allows land owners to travel to their own properties once inside the block. Like the route that accesses my property, this route has no need for modifications or improvements, and the inclusion of this route and the route into lot #13 in the RMP should therefore require no additional paperwork, permitting, or administrative hurdles. These routes exist now and are essential for accessing private lands, and no one is proposing physical changes of any type to these routes. They are arid gravel soils, not prone to further erosion and therefore I believe the continued public use of these routes in the final RMP is environmentally sustainable and poses no potential for resource degradation.		appears that several routes, which are readily identifiable on aerial photography from previous vegetation clearing, are actually pipeline ROWs and are not vehicle roads and thus are not included in the Travel and Transportation network.
DR-MTDK-BL-13-0109-1	Air	Disclosure of Current SO2 Conditions and Potential Impacts Chapter 3, Figure 3-2 provides ambient air quality concentrations in the Planning Area for years 2009-2011. Although data are included for the 1-hour and 24-hour SO2 National Ambient Air Quality Standards (NAAQS), footnotes 13 and 14 seem to indicate that 3-hour and annual data are also available. We recommend including the 3-hour and annual data in this Figure. In addition, the 1-hour SO2 concentration presented in Figure 3-2 is at 105% of the NAAQS. On p. 3-9, it is noted that the Montana Department of Environmental Quality (MDEQ) reported high monitored 1-hour SO2 concentrations during 2010 due to "events that are not likely to be repeated in future years." We recommend expanding this discussion to explain these "events" and why they would not be repeated. BLM conducted near-field modeling to disclose potential impacts to the NAAQS in the Planning Area. However, it appears that the 3-hr SO2 NAAQS analysis was omitted from the near-field modeling runs for the Draft RMP/EIS although it was included in the modeling protocol agreed to through the AQTW. Given the presence of the Laurel SO2 Nonattainment Area within the Planning Area, it is particularly important that BLM disclose potential impacts to the 3-hr SO2 NAAQS.	Y	The footnotes have been revised and data have been updated to reflect years 2010-2012. The BLM refers readers to the MDEQ for additional information concerning SO2 events associated with industrial sources permitted by the MDEQ. Modeling results for the 3-hour SO2 NAAQS have been included in Section 4.1.1.3.1.
DR-MTDK-BL-13-0109-10	Water	The Draft RMP/EIS states that no current, comprehensive quantification or quality measurements have been made for groundwater in the Planning Area. Page 3-39 notes that "the following guidance" sets forth foundations for BLM management of aquatic resources, but no discussion of such guidance follows. We recommend the Final RMP/EIS include disclosure of any future plans for gathering groundwater data in the Planning Area and discussion of the referenced guidance.	n	The BLM does not plan to gather comprehensive planning area ground water data. If a Plan Of Development is submitted that would warrant data collection, it would occur. The "guidance" is referring to a number of plans and recommendations from BMPs to state and federal water quality standards. To clarify, the paragraph referred to will be written as: "Best management practices, state and federal guidance concentrate on protecting water resources, which sets the foundation for BLM management of

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
				both surface and groundwater resources.”
DR-MTDK-BL-13-0109-11	Water	<p>The EPA recommends that the Final RMP/EIS analyze potential impacts to groundwater quality and quantity related to oil and gas well drilling, including leaks and spills; associated production and disposal of produced water, including potential use of pits, underground injection control (UIC) wells, and evaporation ponds; impacts associated with production wellbore integrity and pipeline use; and impacts associated with restimulation and abandonment of existing wells. The EPA also recommends that the Final RMP/EIS discuss measures the BLM will require at the project level to minimize the potential for these impacts to occur. Appropriate groundwater protection measures can vary depending on hydrologic conditions and the presence of drinking water resources. Depending on the level of oil and gas development, lease stipulations may be necessary due to the disproportionate effect on water resources from such development. Specifically, the EPA recommends that BLM analyze and disclose potential groundwater protection, monitoring and mitigation measures, including: BMPs and other mitigation measures such as closed loop drilling, monitoring of water quality and water levels, closure and monitoring of reserve pits, and lining and monitoring of evaporation ponds; Setback stipulations, such as No Surface Occupancy (NSO), to minimize the potential for impacts to potential drinking water resources, including domestic water wells and public water supply wells. EPA recommends a minimum 500-foot setback for private wells. Setbacks are effective health and environment protection tools because they provide an opportunity for released contaminants to attenuate before reaching a water supply well. They may also afford an opportunity for a release to be remediated before it can impact a well, or for an alternate water supply to be secured. We note that the North Dakota Oil and Gas Commission has adopted a 500-foot setback from occupied dwellings (and by default, the associated domestic well); A mitigation plan for remediating future unanticipated impacts to drinking water wells, such as requiring the operator to remedy those impacts through treatment, replacement, or other appropriate means; and A general production well schematic that depicts the following: casing strings; cement outside and between the various casing strings; and the relationship of the well casing design to potentially important hydro-geological features such as confining zones and aquifers or aquifer systems that meet the definition of a USDW. Discuss how the generalized design will achieve effective isolation of USDWs from production activities and prevent migration of fluids of poorer quality into zones with better water quality.</p>	y	<p>Thank you for your comment. Depending on the level of oil and gas development, lease stipulations may be necessary due to the disproportionate effect on water resources from such development.” Relevant to this, the BLM cannot address every potential specific issue that may arise throughout the field office in a programmatic document such as this RMP. The impacts mentioned will be, if scoping identifies them, analyzed at the project level during NEPA analysis. A series of stipulations are available to managers to minimize impacts to water resources.</p> <p>Additionally, since this draft was produced, a new stipulation has been developed to conserve water quality in Source Water Protection Areas (SWPA). An NSO for all SWPAs is stipulated. SWPAs were identified by MT DEQ data.</p> <p>Concerning municipal water supplies, MT DEQ regulates activities with potential to affect municipal water supplies. The BLM works under an MOU to follow MT DEQ guidelines in these circumstances.</p>
DR-MTDK-BL-13-0109-	Water	Surface Water Resource Characterization According to the Draft RMP/EIS, the BiFO manages approximately 1,000 miles of perennial, intermittent, and ephemeral streams. The EPA recommends the Final RMP/EIS describe the	Y	The BLM uses its own data, as well as MT DEQ data, to evaluate water quality of given water bodies when needed. Riparian evaluations and MT DEQ 303d lists are used in conjunction to determine management needs for various water

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
12		<p>current water quality conditions, if available, for each surface water body in the Planning Area, including perennial, intermittent and ephemeral streams, rivers, lakes, reservoirs, and surface water drinking water sources. The EPA also recommends the Final RMP/ EIS disclose the following information: A map and list of Clean Water Act (CWA) impaired or threatened water body segments within, or downstream of, the Planning Area, including the designated uses of the water bodies and the specific pollutants of concern; A map of municipal watersheds and designated source water protection zones; and Maps and descriptions of topography and soils, specifically steep slopes and fragile or erodible soils, especially near surface waters and intermittent/ephemeral channels. We recommend that the Final RMP/EIS be updated to reference Montana's 2012 Clean Water Act (CWA) Section 303(d) Impaired Waters List, as approved by the EPA, and discuss water quality trends to more fully describe current conditions in, and downstream of, the Planning Area. We recommend this discussion include a description of any Total Maximum Daily Loads completed by MDEQ for streams in the Planning Area. In addition, if MDEQ has not assessed the water quality in all water bodies within the Planning Area, then we recommend that the Final RMP/EIS list such water bodies and indicate that the water quality condition has not yet been assessed by MDEQ.</p>		<p>resources.</p> <p>A list of impaired water bodies is present in Chapter 3 of the draft document. The MT DEQ 303d list, easily accessible on their website, has maps and descriptions depicting available information regarding water quality and impaired water resources throughout the Billings Field Office, and the state of MT.</p> <p>Source water protection areas (including municipal watersheds) have been identified. A new stipulation places an NSO within an SWPA to protect drinking water resources in the planning area.</p> <p>A steep slope and erodible soil layer has been developed for the field office with a new "sensitive soil" stipulation that places a CSU on areas with sensitive soils. The CSU requires an approved plan to avoid or mitigate impacts to resources from development on sensitive soils.</p> <p>Impacts from soil disturbance, especially near surface waters, is covered by three stipulations, including the new sensitive soils CSU, the 300' CSU for riparian and water setbacks, and the water/ riparian NSO.</p> <p>TMDLs and subsequent monitoring are controlled by MT DEQ, with BLM contributing data as available. When NEPA analysis of proposed projects identify issues pertaining to water quality, the BLM determines assessment and monitoring needs to maintain or improve water quality.</p>
DR-MTDK-BL-13-0109-13	Water	<p>Sediment Load Analysis The Draft RMP/EIS notes that increased sediment from surface disturbance may degrade water quality. Because sediment loading has already caused impairment of water bodies in the Planning Area, and future activities that may be authorized under this RMP, including oil and gas development, livestock grazing and use of off-highway vehicles (which is expected to double by 2015), would result in surface disturbance that may contribute to erosion impacting watersheds, it is important the Final RMP/EIS include additional information about this concern. It is difficult to determine from the Draft RMP/EIS, Chapter 3, Affected Environment, whether the Planning Area contains sensitive soils, but it does note that some soils in the Planning Area have high susceptibility to erosion. Because erodible soils could represent a source of pollutants in the Planning Area, we recommend the Final RMP/EISEIS include a map depicting areas of steep slopes and fragile or erodible soils and proximity to surface waters.</p>	y	<p>A Sensitive Soils layer has been developed and a new sensitive soils stipulation, a CSU, has been drafted. The description of the sensitive soils will be inserted into the soils section in Ch. 3.</p> <p>In BiFO, a large proportion of sensitive soils are in arid regions with distant proximity to any surface waters, minimizing the impact these disturbances would have on water resources.</p> <p>Threats to water quality from sedimentation, due to various activities, is addressed on the project level through NEPA analysis. For oil and gas development, stipulations help minimize these impacts. For livestock grazing, Land Health Standards and Guidelines are used to promote water quality through protecting riparian health.</p> <p>Comprehensive travel management is being conducted and analyzes and addresses impacts from OHV travel to water quality.</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
DR-MTDK-BL-13-0109-14	Water	<p>Surface Water Impacts and Mitigation Contaminants from surface events such as spills, pit and pipeline leaks, and nonpoint source runoff from surface disturbance have the potential to enter and impact surface water resources if these events occur in close proximity to water bodies. If surface activities are set back from the immediate vicinity of surface water, wetlands, and designated source water protection zones, then there is an opportunity for accidental releases to be detected and remediated before impacts reach water resources. If accidental releases are not detected, the setback provides a safety factor and some possibility of natural attenuation. Setbacks also help prevent nonpoint source pollutants such as sediments from impacting surface waters. Oil and Gas Leasing Stipulations to Protect Water Resources: The Draft RMP/EIS includes two different descriptions of the water resource protections provided by the Preferred Alternative through oil and gas leasing stipulations. Specifically, the Draft RMP/EIS Chapter 2, p. 2-49, and Chapter 4, p. 4-101, describe the Preferred Alternative to include a NSO stipulation within 300 feet of riparian areas, wetlands, 100 year floodplains, water bodies and perennial streams. However, Appendix C, Oil and Gas Stipulations, indicates that the Preferred Alternative proposes the following stipulations: NSO - "Surface occupancy and use is prohibited within perennial or intermittent streams (as indicated by obligate wetland species or hydric soils); lakes, ponds, and reservoirs; floodplains; wetlands; and riparian areas." In addition, a Controlled Surface Use (CSU) stipulation is proposed to ensure that special operating procedures are required within 300 feet of riparian and/or wetland areas. We recommend that the inconsistency be resolved in the Final RMP/EIS and also suggest several modifications to enhance and clarify the water resource protections. If the Appendix C proposed stipulations are the intended version: We recommend against using "obligate wetland species or hydric soils" as indicators for intermittent streams, since this will result in an unnecessarily narrow definition of intermittent stream that would likely result in excluding many of these streams from protection. We recommend further clarification of the "streams" language by including ephemeral streams in the list of water resources to be protected by the NSO stipulation. This is important because the Draft RMP/EIS identifies 1,002 miles of perennial, intermittent, and ephemeral streams in the Planning Area. We recommend clarifying the NSO language to be applicable to "100-year floodplains" in order to provide certainty for operators. We recommend removing the exceptions clause from the NSO stipulation given the importance of preventing disturbance within water bodies and wetland areas. In reviewing numerous oil and gas leasing stipulations contained in other BLM EISs, we have not seen an exception process to allow drilling within water bodies or wetlands. It is our understanding that a "no exceptions approach" within a water body or wetland is BLM's standard procedure. In addition, the EPA recommends BLM</p>	y	<p>The consistency for water and riparian stipulations have been addressed and are represented accurately in the text of the document and in Appendix C, where stips are described. There will be a water/riparian/floodplain NSO and a 300' CSU.</p> <p>When parcels are nominated for leasing, resource specialists conduct GIS investigations and if necessary site visits to determine what resources may be impacted if the lease is developed. During these investigations, the drainages in the area will be classified as perennial, intermittent or ephemeral, depending on many characteristics. If a riparian obligate species is present in a dry channel, it will be classified as intermittent. Soil surveys indicating hydric soils will also result in intermittent classification. Office personnel, with local expertise often times have knowledge of flow regimes in drainages as well, which can supplement on the ground investigations and data queries.</p> <p>Ephemeral drainages are runoff channels, only flowing in direct response to precipitation events and/or snowmelt. Except in gentle terrain, ephemeral drainages are simply too numerous and rarely active to afford the same protections as intermittent and perennial streams. During the permitting process, ephemeral drainages that are recognized as a potential problem for water quality issues will be identified and conditions will be put on the permit to minimize issues that may arise due to the proximity of development to the ephemeral channel.</p> <p>100 year floodplains will be used in place of "flood plains".</p> <p>The WEMs for the water and riparian resources stipulation were developed with regard to "protecting the unique biological and hydrological features and functions associated with perennial and intermittent streams, lakes, ponds, reservoirs, floodplains, wetlands, and riparian areas."</p> <p>Resource managers have discussed the appropriateness of NSO vs CSU for these riparian/water setbacks. Within the MT/Dakota BLM, it was decided that the 300 foot CSU would meet resource objectives. The MT DEQ 303d list of impaired waters shows only two streams that are impaired with oil and gas development as the causal factor. There is very little reference material supporting specific setback distances as most effective at mitigating impacts from oil and gas development. With the minimal impact documented in the state, and the CSU stipulation requiring a development plan that ensures resource objectives will be met, a CSU is deemed acceptable in protecting water resources.</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		<p>consider revising the Appendix C Preferred Alternative CSU setback for riparian and wetland areas to a 500 foot NSO setback for perennial, intermittent and ephemeral streams, lakes, ponds, reservoirs, riparian and wetland areas. Other BLM Field Offices have required a 500 foot setback to minimize potential deterioration of water quality and to maintain natural hydrologic function of stream channels, stream banks, floodplains, and riparian communities (e.g., see Grand Junction Field Office Draft RMP/EIS, NSO-1, Major River Corridors; NSO-2, Streams/Springs). We also recommend adding "springs" to the list of water resources protected by these stipulations in order to maintain proper function of these susceptible resources (e.g., see Grand Junction Field Office, NSO-4, Lentic Riparian Areas -" which includes springs, seeps and fens).If the Preferred Alternative NSO stipulation proposed in Draft RMP/EIS Chapters 2 and 4 is the intended version, then we support this more protective proposal. We recommend expanding it to a 500 foot NSO setback for perennial, intermittent and ephemeral streams, lakes, ponds, reservoirs, riparian and wetland areas, as described in the paragraph above and as has been done in other BLM Field Offices.</p>		
DR-MTDK-BL-13-0109-15	Livestock Grazing, Water	<p>Potential Measures to Protect Water Resources from Impacts Due to Grazing: Grazing has the potential to adversely impact water resources, including surface and ground waters, wetlands, streams, springs and riparian areas. BLM's Standards for Rangeland Health and Guidelines for Livestock Grazing Management for Public Lands Administered by the BLM for Montana and the Dakotas underwent NEPA analysis in 1997 and are incorporated into the relevant RMPs, including the BiFO RMP. We understand from conversations with the BLM Miles City Field Office that BLM's process is to prepare environmental assessments to assess the effects of alternatives developed to ensure that Rangeland Health Standards are met through grazing allotment goals and objectives. If livestock grazing levels or practices are a significant factor in failing to meet Rangeland Health Standards, the BLM has committed to take action no later than the start of the next grazing year to initiate progress toward meeting the Standards. Since such action must be taken quickly, we recommend that the Final RMP/EIS include a list of potential measures that could be implemented at the project level to meet Rangeland Health Standards. This list could include measures that the BiFO has taken in the past, as well as the following suggestions: Require special protections for high quality wetland resources such as springs and fens. Such protections might include development of alternative water sources, fencing to exclude livestock from a spring source, and redirection of spring water to a trough for watering; To avoid possible infiltration of groundwater with contaminants resulting from congregation of livestock, require adequate separation between a livestock water well and a water trough or tank; Specify steps to protect and/or repair any existing exclusions and upland water developments, and develop new range</p>	n	<p>Grazing does have the potential to impact water resources, and BLM is committed (required by regulation) to take action before the start of the next grazing season if it is determined that an allotment is failing to achieve one or more of the standards, and livestock grazing has been determined to be a causal factor. Guidelines (Volume III, Appendix I) have been developed to address many of the common causal problems associated with land health standards and livestock grazing. These guidelines are typically selected, analyzed, and if appropriate implemented following site specific NEPA analysis at the appropriate level (pasture, allotment, area, or watershed). These guidelines may be used independently and/or in conjunction with others. The existing guidelines incorporate many of the potential remedy measures you suggest as well as others. Because site specific conditions may vary widely among allotments, there is no comprehensive list approach that will address problems in all situations. In addition "Other Terms and Conditions" are commonly applied to grazing authorizations to facilitate site specific management and unique circumstances.</p> <p>The use of adaptive management is commonly implemented on a site specific basis and has been addressed in this document.</p> <p>Monitoring and evaluation is typically scheduled based on the management category of an allotment. The current management category of specific allotments can be found in Volume III, Appendix S. Proposed changes to management category by alternative can be found in Volume I, Table 2-6.2, Pg. 2-118 of the DRMP. As directed by existing policy, should an allotment be</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		improvements to protect water resources; Monitor impacts from grazing adjacent to high value water resources; Adjust the timing of grazing by delaying Spring turnout, increasing rotation, and focusing grazing on areas less intensely used in the previous year; and Develop a monitoring plan and schedule to assess effectiveness of range improvements in protecting aquatic resources. In addition, we recommend the Final RMP/EIS identify the general features of an effective adaptive management plan that could be employed at the project level, including the following: Decision tree with achievable and measurable objectives to provide accountability and guide future decisions; Specific decision thresholds with identified indicators for each impacted resource; Targets that specify a desired future condition; Commitment to implement and fund a monitoring plan with protocols to assess whether thresholds are being met; Commitment to use monitoring results to modify management strategies as necessary; and Designated timeframes for completion of necessary management modifications.		determined to not be meeting the water quality standard and livestock grazing is determined to be a causal factor, the allotment would be re-categorized to an "I" management category which would prioritize that allotment for monitoring and evaluation.
DR-MTDK-BL-13-0109-16	Travel Mngt	Potential Measures to Protect Water Resources from Impacts Due to Implementation of Travel Management Plans: Appendix O, Billings Field Office Travel Management Plan, notes that within 3-5 years of issuance of the ROD for the RMP/EIS, Travel Management Plans will be developed for each of the Travel Management Areas identified through this RMP/EIS process. Based on discussion between our staffs, we understand that these Travel Management Plan decisions will be based on additional site specific NEPA analyses. We recommend clarifying Appendix O and the Final RMP/EIS, Section 1.4.1.1, Travel Management Planning, to confirm that site-specific NEPA analyses will be conducted for individual Travel Management Plans.	n	Please refer to Section 1.4.3.1.1 in the draft RMP/EIS for a discussion of Implementation level NEPA analysis regarding Travel Management. In response to your comment, please refer to "Text changes" for Appendix O and Chapter 1.4.1.1 changes. The text has been altered to better reflect that site specific NEPA Analysis will be done.
DR-MTDK-BL-13-0109-17	Water	Public Drinking Water Supply Source Characterization In order to ensure that public drinking water supply sources (e.g., surface water sources, including groundwater under the direct influence of surface water (GWUDISW) sources, and groundwater sources) are protected from potential impacts associated with BLM-authorized activities in the Planning Area, it is important to identify where these sources are located. Therefore, the EPA recommends that the Final RMP/EIS include a map delineating source water protection areas for public water supply wells. Please contact Joe Meek, MDEQ, via the contact information below for a map of the Public Water Supply Inventory Regions in the BiFO. We also recommend identifying reservoirs that are drinking water sources and disclosing potential impacts to these sources.	y	A SWPA stipulation has been developed. It stipulated NSO within SWPAs, with the objective to: "To protect human health by minimizing the potential contamination of public water systems. Source water is untreated water from streams, rivers, lakes, or aquifers used to supply public water systems. Ensuring that source water is protected from contamination can reduce the costs of treatment and risks to public health. This stipulation would protect the State-designated Source Water Protection Areas that protect public water systems from potential contamination." Oil and Gas leasing EAs (NEPA) will identify SWPAs with regard to proposed parcels, making developers and resource managers aware of potential issues. The EA will analyze the impacts of leasing parcels to SWPAs.
DR-MTDK-BL-13-0109-18	Water	Public Drinking Water Supply Source Mitigation In order to ensure public drinking water supply sources (e.g., surface water sources, including GWUDISW sources, and groundwater sources) are protected from potential impacts associated with oil and gas leasing, the EPA recommends the following NSO	y	A SWPA stipulation has been developed. It stipulated NSO within SWPAs, with the objective to: "To protect human health by minimizing the potential contamination of public water systems. Source water is untreated water from streams, rivers, lakes, or aquifers used to supply public water systems.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		<p>language: Municipal Supply Watersheds 1 - NSO within any of the following areas, as deemed appropriate by the BLM: The entire watershed; or Local Source Water Protection Planning Areas where delineated in a Source Water Protection Plan; or Surface Water Spill Response Region or Groundwater Inventory Region defined by Source Water Assessments that have been delineated or evaluated by the State Surface Water Spill Response Regions are 1/2-mile-wide zones (on both sides of rivers or streams, upstream of drinking water intakes. They include the water body with the surface water intake and significant tributaries, for 10 miles upstream of the drinking water intake. For lakes and reservoirs, they include a 1/2-mile-wide zone around the water body Groundwater Inventory Regions are based on a three-year time of travel or a fixed radius of 1,000 feet (concentric buffer) around the public water supply well. For surface water sources, if the Municipal Supply Watersheds NSO stipulation is not deemed feasible by the BLM, then at a minimum we recommend a 1000-foot NSO or CSU setback on both sides of the river or stream, for 10 miles upstream of the intake. For lakes and reservoirs, this would include a 1000-foot NSO or CSU setback around the water body. For groundwater and GWUDISW sources, if the Municipal Supply Watersheds NSO stipulation is not deemed feasible by the BLM, we recommend a minimum 1,000-foot CSU concentric buffer for these sources. We make this recommendation based on consultation with Joe Meek, the Source Water Protection Program Manager with the MDEQ. He may be contacted for additional information at 406-444-4806 or jmeek@mt.gov. The EPA also recommends the BLM include a commitment in the Final EIS and ROD to provide notice to lessees regarding these important areas in the Planning Area. Lease notices for drilling within Source Water Protection (SWP) Zones of public water supplies are now being used for all wells drilled under BLM authority within SWP Zones in Utah. 1. Forest Service Manual (FSM2542) defines Municipal Supply Watersheds to include: "surface supply watersheds, sole source aquifers, and the protection zones around wells and springs." In Montana, protection zones are known as Inventory Regions</p>		<p>Ensuring that source water is protected from contamination can reduce the costs of treatment and risks to public health. This stipulation would protect the State-designated Source Water Protection Areas that protect public water systems from potential contamination."</p> <p>Oil and Gas leasing EAs (NEPA) will identify SWPAs with regard to proposed parcels, making developers and resource managers aware of potential issues. The EA will analyze the impacts of leasing parcels to SWPAs.</p>
DR-MTDK-BL-13-0109-19	Riparian/Wetlands	<p>(5) Wetlands, Riparian Areas and Springs The Draft RMP/EIS indicates that although only 3.5% of the Planning Area is comprised of riparian and wetland areas, the importance of the riparian zone to water quality and quantity is recognized. With this in mind, we recommend clarifying p. 3-55 to describe "the following guidance" that is referenced for setting the foundation for BLM management of riparian habitat, function and water quality. In addition, the Draft RMP/EIS identifies the southern portion of the Planning Area as containing a small desert region that includes several springs supporting an "invaluable" riparian zone. Springs often contain rare or unique plant and animal species in addition to being important contributors to hydrologic function. Therefore, the EPA recommends that the RMP include a commitment for further analysis of</p>	n	<p>The "guidance" is referring to a number of plans and recommendations from BMPs to state and federal water quality standards. To clarify, the paragraph referred to will be written as:</p> <p>"Best management practices, state and federal guidance concentrate on protecting water resources, which sets the foundation for BLM management of both surface and groundwater resources."</p> <p>Impacts to springs are identified and analyzed during project level NEPA analysis. Springs are delineated and identified on maps. Springs are treated as a wetland and/or riparian area in BiFO, affording the same protections. They</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		springs at the project level, including evaluation of function or condition prior to authorizing any activities in these areas. To ensure that springs, as well as perennial seeps and wetlands, are identified to facilitate their protection, we recommend delineation and marking of perennial seeps, springs and wetlands on maps and on the ground before development. Also, we note that Appendix B, Best Management Practices, identifies potential measures to protect springs. We recommend expanding the Final RMP/EIS Chapter 4 discussion of potential mitigation measures that may be applicable at the project level for oil and gas construction, drilling and production activities to prevent adverse impacts to these aquatic resources. These could include silt fences, detention ponds and other stormwater control measures. Other potential mitigation measures, including oil and gas leasing stipulations and measures to protect water resources from grazing impacts, are discussed above under Surface Water Mitigation.		are classified as lentic or lotic, depending on the discharge and flow characteristics. The mitigation measures used to minimize impacts to riparian areas and water resources are described in Appendix B. There are a number of measures that are implemented when and where appropriate. The Oil and Gas development "Gold Book" also describes a number of mitigation measures used to protect and conserve riparian function
DR-MTDK-BL-13-0109-2	Air	The Air Resources Technical Support Document (ARTSD), p. 6, states that Tier 4 emission standards were assumed in the Draft RMP/EIS near-field modeling analysis in order to demonstrate compliance with the 1-hr NO ₂ NAAQS. We note that the ARMP, Section 6.1, initial mitigation requirement for diesel drill rig engines >200 hp to meet Tier 4 emission standards for non-road diesel engines indicates that "oil and gas operators may use drill rig engines that exceed Tier 4 emission standards if modeling demonstrates compliance with the NAAQS and protection of AQRVs." We assume that this caveat means that additional near-field modeling will be required at the project-level if higher-emitting engines will be used. We recommend the Final RMP/EIS and ROD include this commitment.	Y	See the discussion in Appendix T, Section 6.1. Text has been modified to state that modeling or monitoring may be used to demonstrate compliance if non-Tier 4 engines are used. Demonstrations may be made at the project level or at a programmatic level.
DR-MTDK-BL-13-0109-20	Water	Water Management Water demand associated with the drilling and completion of new wells in the Planning Area is an important consideration that will benefit from analysis and disclosure. Although the oil and gas reasonably foreseeable development (RFD) for the Planning Area is relatively low, the Draft RMP/EIS notes that (a) depletion of surface water in the Planning Area watersheds may affect major rivers, including the Yellowstone, and (b) produced water from oil and gas development may affect groundwater. We recommend that the Final RMP/ EIS include a general discussion of the following: Based on predicted well depths, formation characteristics, and well designs (and fracturing operations, if used), estimate a range of water demand per well developed in the Planning Area; Possible sources of water needed for oil and gas development; and Potential impacts of the water withdrawals (e.g., drawdown of aquifer water levels, reductions in stream flow, impacts on aquatic life, wetlands, and other aquatic resources).In addition, the EPA recommends the Final RMP/EIS include a general discussion of how flow back and produced water will be managed including: Estimated volume of produced water per well; Options and potential locations for managing the produced water (i.e., UIC wells, evaporation ponds,	n	The level of development seen and forecasted in the BiFO precludes a need for detailed analysis of these issues. As development occurs, NEPA analysis of proposed projects would identify issues that may affect the environment and determine the impacts thereof. Attempting to analyze these impacts preemptively is not feasible due to the wide range of conditions coupled with the low forecast for development. The scenarios are too varied concerning geology and development location. In the event a large development is proposed, a thorough and detailed analysis would be conducted of issues that are identified through internal and external scoping. These issues are not within the scope of this RMP level document.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		and surface discharges); Possible target injection formations, formation characteristics and depth of any UIC wells; and Potential impacts of produced water management.		
DR-MTDK-BL-13-0109-21	Water	<p>Water Resource Monitoring A general framework for implementation and monitoring of the RMP is provided in Appendix X, Implementation and Monitoring. We recommend expanding this appendix, similar to the Miles City Draft RMP example, to include detailed monitoring measures and identification of frequency, remedial action triggers and management options. In particular, the EPA recommends that BiFO require all BLM-authorized oil and gas multi-well projects to conduct groundwater and surface water monitoring, similar to RMP requirements included by other BLM Field Offices, e.g., White River and Grand Junction in Colorado. To that end, we recommend that the Final RMP/EIS describe the components of water resource monitoring that will be expected of new projects in the Planning Area, including how water quality monitoring will occur prior to, during, and after such development to detect impacts to both surface water and groundwater resources, including private wells. The EPA encourages BLM to include monitoring frequency expectations to ensure water quality changes are detected in a timely fashion to address any increased pollutant levels in streams and to verify expected improvements from changes in management practices. Streams could be prioritized for monitoring frequency where some streams (e.g., 303(d) listed impaired water bodies) would receive yearly or seasonal monitoring and other streams would be monitored much less frequently. Evaluations of water quality could also follow this time schedule as appropriate. A recent example of a water quality monitoring plan is the "Long-Term Plan for Monitoring of Water Resources" developed by BLM for the Gasco Energy Inc. Uinta Basin Natural Gas Development Project Final EIS2. Also, the National Ground Water Association's Water Wells in Proximity to Natural Gas or Oil Development Brief3 provides information on the importance of baseline sampling for private wells and types of analysis recommended.2</p> <p>http://www.blm.gov/pgdata/etc/medialib/b1m/ut/vemalfo/planning/gasco_eis/gasco_folder_6.Par.10452.File.dat/28_Gasco%20Appendix%200.%20Long-term%20Water%20Monitoring%20Plan.pdf 3</p> <p>http://region8water.colostate.edu/PDFs/Water_Wells_in_proximityNGWA2011.pdf</p>	n	<p>This comment addresses issues that are not within the scope of this document. During project development, scoping identifies issues that may affect the environment and subsequently they are analyzed in detail and a decision is made regarding their significance.</p> <p>Monitoring levels of various resources are established through project level NEPA analysis.</p>
DR-MTDK-BL-13-0109-22	WSR	<p>(7) Wild and Scenic Rivers Based on our review of the Draft RMP/EIS, we understand that the BLM uses the RMP process to identify and evaluate rivers for eligibility and suitability under the Wild and Scenic Rivers (WSR) Act. The BiFO developed an inventory of 14 potential river segments in the Planning Area to be considered for eligibility. Draft RMP/EIS Appendix R, Wild and Scenic Rivers, discloses how the eligibility analysis was conducted and how 7 of the 14 potential segments were determined eligible. Draft RMP/EIS, Chapter 4, Environmental Consequences, notes that the Preferred Alternative would</p>	n	<p>Thank you for your comments. The specific comment regarding the process on which Suitability determinations were made was added to Chapter 4, and map # 165 has been modified to reflect suitable river segments.</p> <p>The Preferred Alternative, page 4-442 identifies NSO within 0.5 mile of WSR-eligible and suitable segments, but Appendix C identifies NSO within 0.5 mile of WSR-eligible segments. We will use the same terminology in both sections to avoid any confusion.</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		recommend two of the eligible segments as suitable, and the other eligible segments would be determined non-suitable (and no longer afforded management protection for wild and scenic purposes). We recommend that the Final RMP/EIS disclose how the suitability analysis was conducted and how the suitability determinations were made. In addition, we recommend revising Map #165, Eligible Wild and Scenic Rivers, to include identification of segments with proposed suitability determinations. We also recommend that the Final RMP/EIS ensure consistency between Chapter 4 and Appendix C, Oil and Gas Stipulations. Currently for the Preferred Alternative, page 4-442 identifies NSO within 0.5 mile of WSR-eligible and suitable segments, but Appendix C identifies NSO within 0.5 mile of WSR-eligible segments. We recommend using the same terminology in both sections to avoid any confusion.		The apparent inconsistencies between will be changed
DR-MTDK-BL-13-0109-23	Environmental Justice, NEPA	(8) Environmental Justice The Draft RMP/EIS discloses that American Indians represent nearly 9% of the population in the Montana portion of the Planning Area with a high percentage living in poverty. Depending on the county, percentages of persons living below the poverty level in the Montana portion of the Planning Area range to 24%. The Environmental Consequences chapter of the Draft RMP/EIS states that no alternative will result in identifiable disproportionate effects specific to any minority or low income population or community. To confirm this determination, we recommend additional environmental justice analysis at the project-level stage of NEPA given the demographics of the area and the potential impacts from oil and gas development.	n	Thank you for your comment. Environmental Justice is considered in all project level NEPA documents.
DR-MTDK-BL-13-0109-24	Climate	(9) Climate Change Pursuant to draft Council on Environmental Quality (CEQ) guidance and Executive Order 13514, BLM has included an analysis and disclosure of greenhouse gas (GHG) emissions and climate change. We note that the GHG emissions inventory does not include oil and gas emissions from "downstream" activities such as refining that will occur outside the Planning Area. Because information on these "downstream" indirect GHG emissions from activities may be of interest to the public in obtaining a complete picture of the GHG emissions associated with BLM-authorized activity in the Planning Area, it may be helpful to estimate and disclose them.	N	The BLM does not have sufficient information to estimate GHG emissions from downstream activities.
DR-MTDK-BL-13-0109-3	Air	We also note an inconsistency between the ARMP and ARTSD. The ARMP Section 6.1 includes an initial mitigation measures list which does not include a requirement for drill and completion engines >750 hp to meet Tier 4 generator set emission standards even though this was the emission rate used in the near-field modeling exercise (see the ARTSD, p. E-13, for modeled drill rig emission calculations). Based on conversations between our staffs, we understand that BLM's near-field modeling analysis included the Tier 4 generator set emission rate for engines > 750 hp in order to be representative of what is currently happening in the field (based on BLM experience), and that BLM does not	N	In response to an earlier EPA request under the MOU that larger drill rig and completion engines be modeled, the BLM modeled the largest engines expected to be operating in the planning area. Based on research and discussions with BLM fluid minerals staff, the BLM determined that these largest engines are generator set engines. Smaller non-generator set engines may be used for some wells. At the planning stage, the BLM cannot model every size/type engine combination that could conceivably be used. The BLM's approach is reasonable, but conservative, and predicts compliance with the NAAQS. Both generator set and non-generator set engines are subject to

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		believe requiring Tier 4 generator set emission standards for engines >750 hp is necessary to demonstrate compliance with the 1-hour NO2 NAAQS. To disclose BLM's intent, we recommend that the Final RMP/EIS include the following: Clarification regarding which mitigation measures were necessary to ensure compliance with the NAAQS; and An explanation as to why BLM believes requiring drill and completion engines >750 hp to meet Tier 4 generator set emission standards is not necessary to demonstrate compliance with the 1-hour NO2 NAAQS.		EPA's non-road diesel engine regulations. The BLM is requiring drill rig and completion engines to meet the most stringent EPA emission standards for both generator set and non-generator set engines, with the exception that future modeling or monitoring may demonstrate that the use of non-Tier 4 engines may be used if adequate air quality protection is demonstrated.
DR-MTDK-BL-13-0109-4	Air	In addition, the ARMP Section 6.2, Monitoring-Based Mitigation, indicates that prior to completion of the photochemical grid modeling (PGM) analysis, monitoring-based thresholds for determining enhanced mitigation would be based on evaluation of monitored exceedances of the NAAQS. However, in the discussion of modeling-based thresholds for evaluating enhanced mitigation (Section 6.3), it is stated that "potential future impacts" on NAAQS or Montana Ambient Air Quality Standards (MAAQS) will be considered. To provide clarity regarding the trigger and consistency within the ARMP, we recommend replacing this language with "NAAQS or MAAQS exceedances" predicted via future PGM.	Y	See Appendix T. Section 6.3.1
DR-MTDK-BL-13-0109-5	Air	Further, Section 1.5 of the ARMP includes a detailed discussion of requirements for oil and gas activities that were developed through the 2008 Montana Statewide Oil & Gas EIS (Statewide), some of which are being integrated into the BiFO ARMP. We note that two of the Statewide requirements that are not "carried forward" into this ARMP are requirements to (1) maximize the number of wells connected to each compressor and (2) utilize natural gas fired or electrical compressors or generators. We recommend that BLM provide its rationale for discontinuing these emission-reducing requirements.	N	Natural-gas-fired or electrical compressors or generators are included as initial mitigation in Appendix T, Section 6.1. Due to the low level of development in the planning area and a decrease in compression throughout the area, the requirement to maximize the number of wells connected to each compressor has become a moot point.
DR-MTDK-BL-13-0109-6	Air	Finally, we recommend the following edits to the Draft ARMP to clarify terminology and/or to reflect recent discussions of the AQTW: ARMP pp. T -" 11-12: We understand that BLM intends to run the PGM to cover the full 20 year planning cycle of the RMP rather than performing an initial PGM run followed by periodic reassessments as described in Section 5.1.2 on p. T-12. We recommend revising the text to clarify this point. In addition, we recommend revising Table 2, p. t-11 to include time in the schedule for the AQTW to review results from emissions modeling. Section 6.2.3 indicates that following PGM completion, BLM would calculate design values for each pollutant monitored at a federal reference monitor within the Planning Area. For completeness, we suggest revising this language to include federal equivalent method monitors since data from these monitors could be used in an identical fashion to the data collected from federal reference monitors. Section 6.2.4: After the PGM is completed, we recommend a 1-year timeline for implementation of measures after selection of enhanced mitigation, similar to the timeline provided for	Y	Suggested clarifications have been addressed in relevant portions of Appendix T.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		implementation of enhanced mitigation measures prior to PGM completion (see Section 6.2.2: "Selected mitigation measures would be implemented within one year after the BLM decision to apply additional mitigation").		
DR-MTDK-BL-13-0109-7	Air	Appendix Y, Emissions Inventories Appendix Y, Emissions Inventories, provides slightly different emissions inventory totals as compared to those presented in the ARTSD. In particular, the PKA and PM2.5 emissions associated with Oil and Gas development appear more substantive. We recommend reconciling the two documents or explaining the differences.	Y	Emission inventories were updated and the revised emission estimates are included in Sections 4.1.2.3–4.1.2.6, Appendix Y, and in the ARTSD.
DR-MTDK-BL-13-0109-8	Air	Air Resource Technical Support Document It is important that the emissions controls and mitigation measures used to develop the emissions inventory be included as required mitigation measures for activities under the RMP. The alternative specific emissions inventory includes an 84% control efficiency of gravel or scoria surfacing for calculating dust emissions. The ARTSD, p. 6, identifies assumptions used in this emissions inventory, including a 50% fugitive dust control efficiency but no mention of this 84% control with gravel or scoria. If 84% surfacing control was used in the near-field modeling, then we recommend that this control efficiency be added to the identified assumptions on p.-6 of the ARTSD and that gravel/scoria surfacing be added to the initial mitigation list of the ARMP, Section 6.1. In addition, we have a few recommendations for clarification of the ARTSD, as follows: pp. 14-15 -" Figure 1 illustrates the well pad and receptor layout for PK() and PM2.5 modeling. Please clarify whether this same receptor layout was used for the other criteria pollutants. p. 19 - Predicted criteria air pollutant concentrations were compared to the NAAQS, MAAQS, and Prevention of Significant Deterioration increments. For disclosure purposes, we recommend the annual comparisons for the NAAQS and MAAQS be discussed in this paragraph.	Y	The AERMOD emission inventory was based on a 50 percent fugitive dust control efficiency, which is a conservative estimate, while the alternative-specific emission inventories included 84% reflecting gravel or scoria surfacing which is standard practice in the planning area. The suggested change regarding receptor layout was incorporated into Section 4.1.1.3.1. Annual comparisons to the NAAQS and MAAQS were provided in this section for those pollutants with annual averaging times.
DR-MTDK-BL-13-0109-9	Water	The Draft RMP/EIS, Chapter 3, Affected Environment, notes that groundwater is a valuable resource in Montana and is the primary source of drinking water for Montanans who live outside city boundaries or who use public water systems in smaller towns, as well as the primary source of water in streams and rivers during fall and winter "baseflow" periods. Given the potential and existing groundwater use in the region, it is important to characterize the groundwater resources within the Planning Area. We recommend expanding the discussion in the Final RMP/EIS to include the following information: A description of all aquifers in the study area, noting which aquifers are Underground Sources of Drinking Water (USDWs). Federal Safe Drinking Water Act regulations define a USDW as an aquifer or portion thereof: (a)(1) which supplies any public water system; or (2) which contains a sufficient quantity of ground water to supply a public water system; and (l) currently supplies drinking water for human consumption; or (ii) contains fewer than 10,000 mg/1 total dissolved solids; and (b) which is not an exempted aquifer (See 40 CFR Section 144.3); Maps	y	Previous comment responses regarding SWPAs and the new stipulation to protect them address this comment. Generally, MT DEQ provides standards and guidance in managing activities that could impact drinking water resources, which the BLM complies with through various agreements/MOUs. A SWPA stipulation has been developed. It stipulated NSO within SWPAs, with the objective to: "To protect human health by minimizing the potential contamination of public water systems. Source water is untreated water from streams, rivers, lakes, or aquifers used to supply public water systems. Ensuring that source water is protected from contamination can reduce the costs of treatment and risks to public health. This stipulation would protect the State-designated Source Water Protection Areas that protect public water systems from potential contamination." Oil and Gas leasing EAs (NEPA) will identify SWPAs with regard to proposed parcels, making developers and resource managers aware of potential issues.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		depicting the location of sensitive groundwater resources such as: municipal watersheds, source water protection zones (available from the Montana Department of Environmental Quality-MDEQ, Joe Meek, see contact information below), sensitive aquifers, and recharge areas; and A description of and locations of groundwater use (e.g., public water supply wells, domestic wells, springs, and agricultural and stock wells).		<p>The EA will analyze the impacts of leasing parcels to SWPAs. The commenter states, "Appropriate groundwater protection measures can vary depending on hydrologic conditions and the presence of drinking water resources. Depending on the level of oil and gas development, lease stipulations may be necessary due to the disproportionate effect on water resources from such development." Relevant to this, the BLM cannot address every potential specific issue that may arise throughout the field office in a programmatic document such as this RMP. The impacts mentioned will be, if scoping identifies them, analyzed at the project level during NEPA analysis. A series of stipulations are available to managers to minimize impacts to water resources.</p> <p>Additionally, since this draft was produced, a new stipulation has been developed to conserve water quality in Source Water Protection Areas (SWPA). An NSO for all SWPAs is stipulated. SWPAs were identified by MT DEQ data.</p> <p>Concerning municipal water supplies, MT DEQ regulates activities with potential to affect municipal water supplies. The BLM works under an MOU to follow MT DEQ guidelines in these circumstances.</p>
DR-MTDK-BL-13-0111-3	WILD HORSES, PMWHR	I support the maximization of the available range by increasing water catchments to increase the available forage for the wild horses and other wild life. I also support working with other agencies to increase the size of the range. Including the elimination of the fence across the top of the mountain that limits the horses access to the forage they have used for years. I urge you to work with the National Forest Service to give the horses access to the mountaintop and the Tony Island Spring. In addition, I encourage the collaboration with the National Park Service to add the Sorenson Extension to the wild horse range.	N	Thank you for your comment
DR-MTDK-BL-13-0116-1	Noxious and Invasive Species, Recreation	This comment is meant for the BLM land northeast of Big Timber on Big Can Hill (Rapelje Rd)I strongly support not opening this land for motorized vehicles. There is ample opportunity for target shooting along the Rapelje Road that passes thru this BLM ground. I support all shooting sports but there is plenty of room to shoot along Rapelje Road. People can and do walk into this property to shoot now, they don't need to drive in. Spread of noxious weeds is a huge reason to keep this property closed to motorized vehicles, which are proven spreaders of weed seeds. There is leafy spurge on this property now, but no knapweed. If opened to motorized vehicles it would only be a matter of time before knapweed was brought to this property. That would be devastating to the range and costly to control.	n	<p>Thank you for your comment.</p> <p>The Billings Field Office, in conjunction with the Sweet Grass County Weed District, has been actively treated the weed issue in this area since 2002. BLM plans to continue to treat the invasive and noxious weeds throughout the life of the plan.</p> <p>Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS.</p> <p>There are a range of possible decisions that could be made. In the case of motorized use in the Tin Can Hill parcel, the decision has been made to continue to vehicle closures while allowing motorized access for administrative</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
				purposes such as weed management.
DR-MTDK-BL-13-0117-1	Travel Mngt	Please designate the following areas for non-motorized use, to provide a quiet & natural experience for hikers and for native wildlife: Big Sky Trail, Demijohn Flat, and all of Bear Canyon.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS In regards to the Bear Canyon route, the RMP has a range of possible decisions. In this case, due to the conditions you mentioned the Alternative D has been modified to reflect the current conditions. The route will be designated as "closed" to motorized use and as a non-motorized trail. Refer to map 146
DR-MTDK-BL-13-0121-10	Wildlife	Another concern is how much of the information presented is based on studies of Sage Grouse management Zone 1, which includes northeastern Wyoming and far western North and South Dakota. This broader scale may or may not be directly applicable to the Billings planning area. How does the planning area compare to Zone 1? What similarities and differences exist between the zones and how is Zone 1 compatible with the planning area? Fidelity questions the validity of the proposed stipulations in the EIS if the data used comes from data found in an entirely different management area with no justification as to how applicable to the Billings/Pompey's Pillar planning area this information is	n	See page 3-85 to 90 of the DRMP for a discussion of MZ1 and MZ2 within the Billings Field Office.
DR-MTDK-BL-13-0121-11	Wildlife, Oil and Gas	Much of the current oil and gas development is occurring on private lands with little or no mitigation efforts, which elevates ecological and conservation importance of sage-grouse habitat on public lands." Please provide the source of information stating much of the current development is on private lands.	n	Thank you for your comment. See the Bibliography reference Knick, 2011. Pg. 3-80 - "Nearly 16 percent of Sage-Grouse Management Zone 1 is within 3 kilometers of oil and gas wells, a distance in which ecological impacts are likely to occur (Knick et al 2011).
DR-MTDK-BL-13-0121-12	Wildlife	The "warranted but precluded" listing of the sage-grouse has already increased public awareness of the need for conservation efforts. This has increased conservation efforts on private lands and BLM should discuss some of the measures already in place promoting protection of the bird.	n	Paragraph 3, page 4-288, discusses the NRCS working with grazing operators and range management on up to 10,000 acres in Core Area #4.
DR-MTDK-BL-13-0121-13	Wildlife	BLM should include information on how the decision of the Greater Sage-grouse Habitat Conservation Advisory Council will affect management in the planning area. How does BLM plan to implement the guidance of the Council?	n	BLM intends to rely on the latest research and best available science by utilizing existing research and delaying final decisions until the Governor's Sage Grouse Advisory Council recommendations are final, incorporating the "USGS Range-Wide Genetic Connectivity of Greater Sage-Grouse Populations" study when it is complete, and incorporating other future research through the "Adaptive Management" approach described in Section 2.3.4,
DR-MTDK-BL-13-0121-14	Air	BLM's proposed management routinely exceeds its authority by attempting to control air emissions and air quality despite the regulatory boundaries included in the Clean Air Act (CAA). Under the CAA, only the Environmental Protection Agency (EPA) and its delegates have sole authority for such regulation. Since MDEQ already has an approved program along with the requisite expertise to handle the air quality, why does BLM feel compelled to develop a separate	Y	The Clean Air Act's regulations impose extensive actions after ambient air quality monitoring indicates violations of the NAAQS and exposure of the public to unhealthy air quality. As explained in Appendix T, Section 1.5.3, the BLM operates under FLPMA and NEPA mandates to protect air resources and prevent violations of the Clean Air Act. As described in Appendix T, Section 4.1, the BLM will use only quality-assured monitoring data when determining

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		program? Moreover, the CAA has already established extensive actions based on actual monitoring data. Clearly, BLM should only use approved design values prior to implementing mitigation measures on sources in the planning area.		mitigation design values and will confer with the MDEQ and EPA concerning these values.
DR-MTDK-BL-13-0121-2	NEPA	The alternatives were explained in the Draft (EIS), but useful information was not included in the Draft RMP. BLM's planning regulations similarly require the BLM to estimate the physical, biological, economic, and social impacts associated with each alternative in the RMP/EIS and a proper description of the alternatives was not provided	N	Thank you for your comment. Please see the Executive Summary, or Chapter 2 for a description of the alternatives.
DR-MTDK-BL-13-0121-3	Oil and Gas	BLM also failed to comply with the Energy Policy and Conservation Act requirements to use the least restrictive stipulations necessary for oil and gas exploration and development activities	N	Thank you for your comment. BiFO has complied and used the least restrictive stips as possible.
DR-MTDK-BL-13-0121-4	Oil and Gas	BLM needs to provide details as to how they plan to utilize scientific protocols and assess the effectiveness of management actions. The descriptive language in the RMP is very vague and comes with a lot of uncertainty of what the oil and gas industry can expect in the future.	N	Thank you for your comment.
DR-MTDK-BL-13-0121-5	Wildlife, Oil and Gas	There are maps for NSO, CSU and TLS regarding oil and gas "leasing standard stipulations" and "major moderate constraints," however there were not separate maps available for many of the species with proposed restrictions. BLM should provide all of these habitat maps to allow interested parties to determine exactly what areas will be affected separately from maps demonstrating overall restrictions	n	Thank you for the comment. Individual species maps are compiled on Maps 50-57 that identify Fluid Minerals Standard Lease Terms and Major/Moderate Constraints, the individual species maps are not included.
DR-MTDK-BL-13-0121-6	NEPA	More in-depth information regarding compensatory mitigation should be included in the document if BLM is proposing to implement it.	Y	Thank you for your comment. Please see Appendix__ for information on compensatory mitigation.
DR-MTDK-BL-13-0121-7	Wildlife	BLM has relied upon scientific data which is flawed for a number of reasons, not the least of which is the inappropriate reliance upon general scientific conventions based upon male lek attendance, but also because it is too general to be extrapolated to the planning area, and because it is based upon development scenarios that are unlikely to occur within Montana	n	Thank you for the comment. BLM intends to rely on the latest research and best available science by utilizing existing research. Other future research will be incorporated through the "Adaptive Management" approach described in Section 2.3.4, page 2-7 of the DRMP.
DR-MTDK-BL-13-0121-8	NEPA	Fidelity has noted a distinct lack of documentation demonstrating why current management strategies in the planning area are proving inadequate. A need for updates or added restrictions is required in order to justify additional stipulations.	n	Refer to ES 1.1 "Purpose and Need" on pages ES-1 and 2.
DR-MTDK-BL-13-0121-9	Wildlife	Fidelity is concerned about BLM's reliance on data from the National Technical Team (NTT) report. A variety of peer-reviewed, scientific information should be included in the RMP in order to produce the best planning effort. Instead it seems BLM relies almost solely on information from the NTT report. Additionally, the Northwest Mining Association (NWMA) recently published a report which questions the validity of the NTT report, as the United States Fish and Wildlife Service's (USFWS) "warranted but precluded" determination was based on the conservation measures already in place in BLM manual 6840-" Special Status Species Management. Furthermore, the recommendation in the NTT report does	n	In response to the greater sage-grouse management objectives described in the 2006 WAFWA Greater Sage-grouse Comprehensive Conservation Strategy, many reports have been prepared for the development of management recommendations, strategies, and regulatory guidelines. The National Technical Team report (NTT 2011), Conservations Objectives Team (COT; FWS 2013), and the Summary of Science, Activities, Programs and Policies that Influence the Rangewide Conservation of Greater Sage-Grouse (also referred to as the Baseline Environmental Report [BER]; Manier et al. 2013) are the most widely used reports that have been incorporated in BLM

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		<p>not acknowledge the transient nature of activities occurring at a well. There is much more activity near the beginning of the drilling process, but once the well goes into production activity drastically declines and interim reclamation can usually begin. After a well is plugged and abandoned, the area is fully reclaimed and the site will return to productive habitat. Fidelity finds these issues very concerning and feels the measures contained in the EIS are unnecessarily restrictive or simply cannot be implemented.</p>		<p>and Forest Service EISs that address the effects of implementing greater sage-grouse conservation measures on lands they manage. [May use response to comment 10 above for specifics for NTT, COT, BER reports.] Management actions by the BLM and the Forest Service in concert with other State and Federal agencies, and private land owners play a critical role in the future trends of greater sage-grouse populations. To ensure management actions are effective and based on the best available science, the BLM's National Policy Team created a NTT in August 2011. The objective for chartering this planning strategy effort was to develop new or revised regulatory mechanisms, through land use plans, to conserve and restore greater sage-grouse and their habitat on BLM-administered lands on a range-wide basis over the long term. The NTT report (NTT 2011) used the best current scientific knowledge to guide the BLM and the Forest Service planning efforts through management considerations to ameliorate threats, focused primarily on priority greater sage-grouse habitats on public lands.</p> <p>On December 27, 2011, the BLM released IM 2012-044. In accordance with this IM, the BLM must consider all conservation measures developed by the NTT in at least one alternative in the land use planning process. For the majority of greater sage-grouse DRMP/EISs, Alternative B fulfills this requirement by incorporating the recommendations set forth by the NTT. Other alternatives, including those developed by individuals and conservation groups, as well sub-regional alternatives developed by regional offices of the BLM and the Forest Service, have incorporated elements of the NTT report.</p> <p>The COT report (FWS 2013) qualitatively identifies threats/issues that are important for individual populations across the range of greater sage-grouse, regardless of land ownership. The Summary of Science, Activities, Programs and Policies that Influence the Rangeland Conservation of Greater Sage-Grouse (also referred to as the Baseline Environmental Report [BER]; Manier et al. 2013) then provides complimentary quantitative information to support and supplement the conclusions in the COT. Both documents helped planning teams identify issues within their planning area, determine the context within the management zone, prioritize habitats, and assist in creating a range of alternatives with management actions that can alleviate or mitigate threats to greater sage-grouse at an appropriate level. Both the NTT report and the COT report tier from the WAFWA Greater Sage-grouse Comprehensive Conservation Strategy (Stiver et al. 2006).</p> <p>Alternative B is based on A Report on National Greater Sage-grouse Conservation Measures (NTT report) per direction in IM 2012-044. Conservation measures included in the NTT based alternative focus primarily on greater sage-grouse PPH and include a 3-percent disturbance cap in PPH. PPH areas have the highest conservation value to maintaining or increasing</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
				greater sage-grouse populations.
DR-MTDK-BL-13-0122-1	WILD HORSES, PMWHR	The use of reversible fertility drugs via darting has been working in the mares observed and even more successfully with the stallions. The costs are far less than rounding up and then taking care of the horses in pens. (I live in Sparks, NV and board my horse just south of the BLM holding pens in Palomino Valley; they are never empty, often full.) The cost of darting the stallions is even less. The Carolina wild horses on the east coast have been managed by darting the females and the results are positive. The mares need to reproduce to be viable to the herd. The younger mares, with higher percentages of problems with pregnancy, births and raising the foals, due primarily to their young age, are darted for their first several years. Once the mares reach a more mature age they are left to breed until they have a foal, then can be darted again. The BLM's removal of horses from the range, with the known benefits of fertility drugs, is out dated. And based on the costs of maintaining the holding pens, lack of adoptions, and controversy surrounding the issues is obviously not working.	N	Thank you for your comment. This document is not tied to any gather as gathers are implementation level documents.
DR-MTDK-BL-13-0123-1	Oil and Gas	Although Montana has regulations that provide for minimal chemical disclosure, most of the chemicals used in oil and gas drilling are kept secret from the public. In addition to these rules, BLM recently released draft chemical disclosure and well stimulation rules ¹ . We believe that, even though these rules also do not go far enough to protect water quality, they have some good provisions, and the final RMP must include these draft rules.	n	Thank you for your comment.
DR-MTDK-BL-13-0123-10	Coal	While the uncertainty of Asian coal demand raises serious questions about whether or not exports are a wise economic investment, it is clear that if Powder River Basin coal production is to have a future, it is in exports. This is significant because before leasing coal, BLM must determine that a lease sale serves the interests of the United States. Previous federal coal lease decisions have been explicitly justified on the basis that they served the nation's interests as a source of domestic energy. By leasing cheap coal for export to Asia (in particular, China, Asia's largest market), BLM subsidizes the economic engine of America's direct economic competitor at a cost to American jobs, in particular in the manufacturing sector	N	Thank you for your comment. The current Asian export market is strong and favors Montana PRB mines due to their coal quality and transportation advantages over Wyoming PRB coal producers. Due to the soft domestic coal market, MT coal mines may be able to maintain current production rates by participating in the export market thereby preserving jobs and royalty income to government entities.
DR-MTDK-BL-13-0123-2	Oil and Gas	Although the current public debate focuses on contamination from hydraulic fracturing, other deficiencies such as faulty well casing, cement failure, and surface spills are all major threats to water quality and are the most common ways that water becomes contaminated in drilling operations. Earth justice has documented with an interactive map many of the known contamination cases across the US. ³ However, since the water contamination that the Fort Peck Indian Tribe is facing from old oil wells is not on the map, it is certain that other incidents are also not accounted for. Through the RMP, the BLM should make sure that stronger casing and cementing standards are in place. These standards are currently included in the draft chemical disclosure and well	n	Thank you for your comment. There is no fracking currently occurring in the Billings Field Office and it is unlikely to occur. Language has been added to Chapter 3 to address your concerns.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		stimulation rules just released by the BLM		
DR-MTDK-BL-13-0123-3	Oil and Gas	This water management practice is called a closed-loop system and is very effective for preventing some water pollution. Interestingly, despite this step forward, the filter socks that have been straining frack water have been exceeding federal radioactivity limits. This is an entirely new threat to our water system and, since the Montana Bakken stems from the same formation, it is a likely threat in Montana as well as North Dakota. The RMP must take these new developments into consideration. One resource could be the draft EPA "Study of the Potential Impacts of Hydraulic Fracturing on Drinking Water Resources." This study is scheduled to be completed in 2016 and the data collected so far should be addressed in the RMP	n	See Chapter 4, Water for text changes describing impacts from hydraulic fracturing. Also, see Chapter 3, Minerals, Leasable Minerals, Oil and Gas, and the Minerals Appendix, Oil and Gas, Fluid Minerals Operations and Procedures, Completion section for modifications. Draft documents are considered in planning but their draft decisions are not incorporated as they are subject to change.
DR-MTDK-BL-13-0123-4	water	The EPA has estimated that between 70 and 140 billion gallons of water are required annually for fracking ⁶ . This water is completely lost to the system since it is contaminated with chemicals and much of it is disposed of into deep-injection wells. This is in contrast to agricultural water use. Agriculture is the largest water user in Montana, but the water used is sent back into the overall water cycle. As the RMP states, one of the RMP's water management goals is to "protect water quality for municipal, industrial, agricultural, recreation, and residential purposes by adopting protective measures to meet federal, tribal, state, and local water quality requirements" (2-55). While the RMP thus affirms the importance of water, the impacts to water quantity from oil and gas development are not fully mitigated in the preferred alternative. First, we recommend the BLM document the amount of water available in the system on federal lands. According to the RMP, "no current, comprehensive, quantification, nor quality measurements have been made on ground waters occurring on BLM administered lands" (3-39). This needs to be remedied, and in particular, the BLM needs to track the amount of water used for federal oil and gas drilling. Some water resources are being documented on the industry-run website, FracFocus (fracfocus.org). However, from research mentioned in the Gone for Good report from Western Organization of Resource Councils, this data is incomplete. The BLM needs to take the lead on this through the RMP. Additionally, once documented, each well should have monitoring systems to ensure that the actual amount of water being used is accurate. Flow control devices should be installed on all BLM water resources	Y	The commenter states, "Appropriate groundwater protection measures can vary depending on hydrologic conditions and the presence of drinking water resources. Depending on the level of oil and gas development, lease stipulations may be necessary due to the disproportionate effect on water resources from such development." Relevant to this, the BLM cannot address every potential specific issue that may arise throughout the field office in a programmatic document such as this RMP. The impacts mentioned will be, if scoping identifies them, analyzed at the project level during NEPA analysis. A series of stipulations are available to managers to minimize impacts to water resources. Additionally, since this draft was produced, a new stipulation has been developed to conserve water quality in Source Water Protection Areas (SWPA). An NSO for all SWPAs is stipulated. SWPAs were identified by MT DEQ data. Concerning municipal water supplies, MT DEQ regulates activities with potential to affect municipal water supplies. The BLM works under an MOU to follow MT DEQ guidelines in these circumstances.
DR-MTDK-BL-13-0123-5	Air	One major impact from oil and gas in terms of air quality is the occurrence of flaring. In Montana, oil and gas wells can flare for an unlimited amount of time, if they produce less than 100,000 cubic feet of gas per day. This is extremely hazardous for the local air quality and contributes the larger threat of climate change. Although there is less development in the Billings Field Office than in the Bakken where much of the flaring occurs, the RMP should still limit flaring and require green completion systems for all federal wells. Fortunately,	n	See Chapter 3, Air Resources and Climate, Climate Change, National Actions to Reduce GHGs section. Also, see the Air Resources and Climate Appendix, Air Resource Management Plan: Adaptive Management Strategy for Oil and Gas Resources, section 1.5.2 for additional information on GHG emission reductions and controls.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		according to a 2012 GAO report on natural gas emissions on federal lands, "data from EPA, supported by information obtained from technology vendors and GAO analysis, suggest that around 40 percent of natural gas estimated to be vented and flared on onshore federal leases could be economically captured with currently available control technologies.8" There is no reason why the BLM could not institute these technologies as conditions on each lease or as an overall RMP policy due to the climate and air quality impacts		
DR-MTDK-BL-13-0123-6	Minerals	The Montana Bureau of Mines and Geology in conjunction with Montana Tech of the University of Montana are exploring a number of potential sites for frack sand mining. Two of those proposed sites are located in the Pryor Mountains (see Attachment 5). The BLM needs to be monitoring this proposed development and be ready to analyze any of the impacts associated with this mining. A section in the RMP about the potential for development should be included	n	Thank you for your comment. The BLM is aware of the potential for and interest in "frack" sand in the Bear Canyon area. Any proposed activity will be subject to the BLM's 43 CFR 3809 Surface Management Regulations. Actual mining or disturbance greater than 5 acres would require the submittal of a Plan of Operations and compliance with NEPA. Chapter 3 has been edited to include discussion of the potential for "frack" sand, although the potential is quite limited and the development potential is low.
DR-MTDK-BL-13-0123-7	Wildlife	Under the draft RMP there are some areas of overlap between sage priority protection areas and no surface occupancy oil and gas leases. While the NSO stipulation is a good step forward in some ways, it is concerning that more of the area is not closed to leasing. This needs to be considered since even with a no surface occupancy restriction, well pads and the associated infrastructure (such as roads and pipelines) are still built nearby. From reviewing sage grouse studies, it is clear that setbacks (which is what no surface occupancy essentially is) are just one way to address the issue. According to Oil and Gas Development and Greater Sage Grouse (centrocercus urophasianus): A Review of Threats and Mitigation Measures, "The focus on set-back distances provides only a finite set of options for land managers and permittees alike. Because this approach does not take into account the specific causes of sage grouse avoidance, mortality, or potential population-level effects, it is of limited effectiveness to sage grouse conservation and management. A more comprehensive approach should incorporate performance standards that are based on an understanding of specific causes and effects of oil and gas infrastructure impacts on sage grouse (i.e., noise, predation, disease), as well as consideration of habitats other than leks (i.e., nesting, brood rearing, and winter habitats).	n	Refer to page 2-77, Alternative B, states "Closed to future oil and gas leasing, exploration and/or development." Alternatives C and D state that , "Surface occupancy and use would be prohibited in sage-grouse PHMAs (NSO)." It is hoped that Adaptive Management can implement new guidelines such as Performance Standards as future research may indicate. Refer to cumulative effects section 4-286, paragraph one "Wildlife management opportunities for the BLM are very limited in scattered land ownership areas...." BLM can apply protections to Public lands only, make recommendations to private surface landowners on private surface/ Federal mineral estate and cannot provide any direction for surrounding non-public lands. In addition, the Land Use Planning Handbook, H-1601-1, Appendix C, page 24, states: "When applying leasing restrictions, the least restrictive constraint to meet the resource protection objective should be used." Please refer to Appendix AA (section F), Mitigation Measures and Conservation Actions for Sage Grouse Habitat", that emphasizes a more comprehensive approach to habitat management and BMPs for sage grouse from Fluid Mineral development.
DR-MTDK-BL-13-0123-8	Coal	To protect private property rights and preserve the intent behind surface owner consultation, BLM should undertake new surface owner consultation before it finds lands suitable for further consideration for leasing, as required under 43 CFR 3420.1 4(e), and at the very least, the agency needs to ascertain surface owner consent before any coal exchanges	N	The coal screening process will be applied to future lease application and exchange areas.
DR-MTDK-BL-13-0123-9	Coal	While we applaud BLM's decision to take action to protect sage grouse, we encourage BLM to take a hard look (if it has not done so already) at the effects of underground mining on sage grouse populations. While undoubtedly less	n	Thank you for your comment. Please see the Alternatives table in Chapter 2 - solid leaseables (coal) to address your concern

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		significant than those caused by surface mining, underground mining techniques such as longwall mining lead to significant subsidence cracks that disturb land and threaten water resources. In the Bull Mountains, problems with carbon monoxide at Signal Peak Energy's mine have required new road construction, new pipeline, and at least one diesel generator to power noisy fans to clear out the mine. While those were necessary and appropriate safety steps, they would have a significant effect on an area, both due to direct disturbance as well as issues like noise (which has a well- established effect on sage grouse leks). Subsurface mining still has a noteworthy effect on an area that BLM needs to evaluate		
DR-MTDK-BL-13-0127-1	Travel Mngt	I specifically ask that the Big Sky trail and Bear Canyon Creek Trail be designated only for non-motorized use. In BLM's "preferred alternative" the beginning of both the Bear Canyon Creek Trail (0.5 mile) and the Big Sky Trail (1 mile) are designated for motorized use. Walkers on these increasingly popular trails should not need to hike to the end of 4WD/ATV routes to get to quiet trails. (Many people do not have 4WDs or prefer to walk.)	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS In regards to the Bear Canyon and Big Sky routes, the RMP has a range of possible decisions. In this case, due to the conditions you mentioned the Alternative D has been modified to reflect the current conditions. The routes will be designated as "closed" to motorized use to the public but BLM will retain motorized access for administrative purposes Refer to map 146
DR-MTDK-BL-13-0127-2	Travel Mngt	I ask that the Demijohn Flat route not be open to motorized use. This 1 ½ mile route from Crooked Creek Road threatens a culturally sensitive area which is designated as both a National Register District, and an Area of Critical Environmental Concern (ACEC). Motorized use of this route fractures the Burnt Timber Canyon LWC* from the Burnt Timber Canyon WSA** and thus weakens both. The route is also a good non-motorized route with a trailhead accessible to people without 4WD vehicles.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS. Refer to map 146
DR-MTDK-BL-13-0127-3	Travel Mngt	I ask that Bear Canyon be designated for only non-motorized use beyond the mouth of the canyon. BLM's preferred alternative authorizes motor vehicle use of Graham Trail up the southwest slope of Big Pryor Mountain. That makes three redundant parallel motor vehicle routes within less than three miles. (The other two are Bear Canyon and Stockman Trail.) One of the three routes should be designated for non-motorized use. Of the three routes Bear Canyon, through an Audubon Important Bird Area, would be the best non-motorized route. (There would still be abundant motorized access to Big Pryor Mountain with four more motor routes up the west slope, and two more nearby on the south slope.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS In regards to the Bear Canyon route, the RMP has a range of possible decisions. In this case, due to the conditions you mentioned the Alternative D has been modified to reflect the current conditions. The route will be designated as "closed to motorized vehicles" except for administrative purposes Refer to map 146
DR-	Travel Mngt	as I understand the current document, it is at least partially incomplete. The	N	Thank you for your comment. The route reports were and are available upon

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MTDK-BL-13-0129-1		Billings and Pompeys Pillar National Monument DEIS did not contain individual route reports for motorized and multiple-use recreation closures when it was published. BLM sent out an e-mail notice on May 13, 2013 with a web site link to the detailed route information. However, when my staff attempted to follow this web site link, the Internet browser could not display the information. Attached to this letter is a screen shot of the browser's attempt to retrieve this information.		request. With regards to the incorrect link, as soon as that was identified the correct link was sent to the MTVRA. The route reports have been available on-line since May 2013.
DR-MTDK-BL-13-0129-2	Travel Mngt	I have serious concerns about the public's ability to access information that is vital to their ability to review the BLM's proposed decision because this travel information was provided nearly halfway through the public comment period. and because it appears to be inaccessible even after it was posted. The National Environmental Policy Act and its implementing regulations require an agency to provide the detailed information on its proposed decision to the public. It appears BLM has failed to meet that standard in this instance.	N	Thank you for your comment. The route reports were and are available upon request with regards to the incorrect link, as soon as that was identified the correct link was sent to the MTVRA. The route reports have been available on-line since May 2013.
DR-MTDK-BL-13-0129-3	Social/Econ	The third reason I request an extension is because I understand that a significant part of the BLM's plan is intended to protect sage grouse habitat and populations. While I support this goal, I fear the proposed plan is an unnecessarily onerous restriction upon oil and gas development, coal development, agricultural grazing and operations, multiple-use recreation, and other important public lands uses in this area. I believe there is a more effective way to protect sage grouse without drastically impacting Montana's major economic drivers in over one-third of the State. The area covered by this DEIS is one of the most important future economic development areas in Montana. BLM manages 3 million surface acres and 12 million sub-surface acres. In addition to that, the activity or restrictions on BLM land affects neighboring private, state and Tribal land. In short, a poorly-crafted or overly-broad BLM land use restriction can have the effect of shutting down resource development on neighboring lands owned by others, including the State of Montana. Eastern Montana has vast untapped oil, gas, coal, wind and other resource potential, and I believe the BLM restrictions proposed in the DEIS could have untold consequences for current and future generations of Montana workers and families.	n	Opinion: not text edits necessary. The DEIS describes the employment and income consequences of each alternative related to energy development on pg. 4-605
DR-MTDK-BL-13-0129-4	Air	BLM's land planning efforts appear to be exceeding its authority in the arena of air quality. Under the Clean Air Act, the Environmental Protection Agency and the State work hand in hand to manage for clean air standards, with the State as the primary and preferred air quality management sovereign. As you may know, Montana and the EPA have recently completed an air quality plan for the State. The BLM's management under the DEIS appears to have been created in isolation from the EPA / Montana plan, and is in fact more restrictive than that plan. I urge you to examine this issue, and to allow all parties more time to evaluate this troubling proposal.	Y	The BLM recognizes the MDEQ's lead role in air quality management within the state and provided a more robust explanation of the state program and of the BLM's authority in Section 1.5 of Appendix T. Several of the provisions of the ARMP were developed in conjunction with the EPA and other Federal Land Managers under the Air Quality Oil and Gas Memorandum of Understanding (MOU, see the USDI 2011 entry in References). The BLM seeks to create a Memorandum of Understanding with the MDEQ that will enhance communication, reduce duplication of effort, and identify additional emission controls, if needed.
DR-	NEPA	I have serious concerns about the way the DES cooperated with numerous	n	Thank you for your comment. Please see Chapter 4 for the environmental

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
MTDK-BL-13-0129-5		Montana local governments, including county commissions and grazing districts, under the cooperating agency status provisions in federal law and regulations. As you are aware, land management documents like this must be consistent with local government resource plans. If they are inconsistent, the DEIS must disclose and discuss any inconsistencies with local plans and laws, and discuss how these inconsistencies will be reconciled. The DEIS must evaluate the environmental consequences resulting from its conflict with local resource plans. And perhaps most importantly for this document, the DEIS must evaluate and discuss the economic impact of its proposed action, and the impact of its inconsistency with local government resource plans. In this regard, numerous local governments have expressed to me that the DEIS did not evaluate their resource plans, did not evaluate inconsistencies with such plans, and did not adequately analyze the economic impacts of its restrictions compared to local government resource plans. These same concerned local government leaders also feel they were surprised by many of the provisions contained within the DEIS, which were contrary to what they had reviewed in their role as cooperating local government and agency representatives. I urge you to ensure BLM officials fully utilize the cooperating agency process in good faith, with full disclosure, and with respect to the role these local citizen representatives have under federal and state law.		consequences and Chapters 2 and 5 for discussions of inconsistencies between the Proposed RMP and county or local plans. The Billings and Pompeys Pillar National Monument RMP/EIS has 15 cooperating agencies involved in the B&PPNM RMP/EIS. Invitations were sent to 43 federal, tribal, state, and county agencies inviting them to participate as a cooperating agency.
DR-MTDK-BL-13-0131-1	lands with wilderness characteristics	I employ you to consider strongly the wilderness characteristics by minimizing intrusion. Choosing to protect this land, Billings-Pompey's Pillar area would help secure the integrity of these unique prairie lands.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS
DR-MTDK-BL-13-0135-17	NEPA	Recognizing the need to protect both existing cutthroat populations and also restoration opportunities, the neighboring Butte Field office adopted a ½ mile NSO in their RMP (2009) for streams suitable for cutthroat trout reintroductions. It should be noted that the BLM's Instruction Memorandum 2010-117 - Oil and Gas Leasing Reform - " Land Use Planning and Lease Parcel Reviews, speaks to the need for stipulation consistency for like resources across planning areas boundaries. Specifically, IM 2010-117 states, " The IDCR Teams will work with the field offices within their state(s) and across state administrative boundaries to ensure lease stipulations edge-match appropriately across BLM administrative boundaries and other appropriate units such as a species range or an ecoregion.	N	Thank you for your comment. The BLM oil and gas stipulations are currently undergoing a consistency review between the field offices with RMP revisions underway. The BLM and BiFO recognize the importance of protecting cutthroat trout and habitat suitable for reintroductions. The BLM is required to adopt the least restrictive development stipulations that will satisfy the resource objectives. In this case, resource specialists believe the CSU will provide adequate protections to conserve suitable cutthroat trout habitat.
DR-MTDK-BL-13-0135-17	Fisheries	Recognizing the need to protect both existing cutthroat populations and also restoration opportunities, the neighboring Butte Field office adopted a ½ mile NSO in their RMP (2009) for streams suitable for cutthroat trout reintroductions. It should be noted that the BLM's Instruction Memorandum 2010-117 - Oil and Gas Leasing Reform - " Land Use Planning and Lease Parcel Reviews, speaks	N	Thank you for your comment. The BLM oil and gas stipulations are currently undergoing a consistency review between the field offices with RMP revisions underway. Thank you for your comment.

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		to the need for stipulation consistency for like resources across planning areas boundaries. Specifically, IM 2010-117 states, " The IDCR Teams will work with the field offices within their state(s) and across state administrative boundaries to ensure lease stipulations edge-match appropriately across BLM administrative boundaries and other appropriate units such as a species range or an ecoregion.		The BLM and BiFO recognize the importance of protecting cutthroat trout and habitat suitable for reintroductions. The BLM is required to adopt the least restrictive development stipulations that will satisfy the resource objectives. In this case, resource specialists believe the CSU will provide adequate protections to conserve suitable cutthroat trout habitat.
DR-MTDK-BL-13-0135-19	Fisheries	½ mile NSO buffer for Red Ribbon Streams As discussed, above, the MRIS is a ranking system used to quantify fisheries values. In the planning area, Red Ribbon (Class II) streams include Rosebud Creek including both the East and West forks, Rock Creek and the Yellowstone River downstream of the Blue Ribbon portion. While not as high of value as Blue Ribbon Streams, these are still very important fisheries that require protections in order to ensure that oil and gas development does not impair either the habitat or recreational values that are evaluated to determine stream classifications. Additionally, Rosebud Creek is the largest tributary to the Stillwater River, a Blue Ribbon Stream; protecting Rosebud Creek will help to ensure the integrity of the Stillwater River. For these reason's MTU urges the BLM to adopt a ½ mile NSO buffer for Red Ribbon streams.	n	<p>Thank you for your comment.</p> <p>BLM has developed a range of alternatives, all of which protect wildlife resources to an acceptable degree. Alternative B protects Red Ribbon streams with the ½ mile NSO stipulation.</p> <p>In Alternative D, the preferred alternative, those streams labeled as red ribbon would be protected with a 300 foot CSU stipulation. This stipulation requires the developer to submit a plan that will ensure there are no unacceptable impacts to resources of concern (fish, water, etc). The BLM does not see this stipulation as sacrificing any resource integrity, regardless of the class of stream. For this reason, only the highest resource values were afforded the ½ mile buffer to ensure protections beyond the normal, because the resources are beyond the normal for the analysis area.</p> <p>The BLM is required to adopt the least restrictive development stipulations that will satisfy the resource objectives. The 300 foot CSU is more protective than current management, which has not led to any impacts from oil and gas development that have degraded red ribbon fisheries.</p>
DR-MTDK-BL-13-0135-20	Fisheries	Montana Fish Wildlife and Parks concurrence needed for stipulation exceptions, modifications or waivers. MTU is concerned with the exceptions, modifications or waivers (EMW) language that is included in resource stipulations; specifically, MTU feels that not just consultation with Montana Fish Wildlife and Parks (FWP) needs to occur, but that there needs to be concurrence with Montana FWP biologists before a stipulation for fisheries or wildlife protection is waived, modified or excepted. For example, as written the ½ mile buffer for YCT conservation populations may be waived "if the authorized officer determines that the entire leasehold can be occupied without adversely affecting Yellowstone cutthroat trout populations and Yellowstone cutthroat trout habitat." (Appendix C-181) At Appendix H-22, the proposed RMP specifies that exceptions and waivers require FWP "consultation" but not concurrence. More concerning is that lease modifications (e.g. shrinking and NSO buffer from ½ mile to ¼ mile) does not require any consultation with FWP. Given that BLM is the land manager, but throughout the DEIS states that FWP manages the	n	<p>Thank you for your comment. To clarify, MT FWP manages the wildlife, the actual populations and individual animals. On BLM managed public lands, the BLM manages the habitat.</p> <p>The BLM will review WEM applications and determine what impacts would affect given resources and whether those impacts are acceptable. This would be part of the NEPA process and MTFWP can provide input during the NEPA process.</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		resources, it is imperative that the agency responsible for managing the resource concur with any determination that a lease exception, modification, or waiver will not adversely affect that resource.		
DR-MTDK-BL-13-0135-21	Fisheries	<p>Impacts analysis needs to consider both sedimentation and spills The impacts analysis only considers the effects of sedimentation, see 4-303: "These NSO stipulations and consistent surface disturbing management actions would protect fisheries resources by minimizing potential habitat degradation resulting from surface disturbance; erosion and sedimentation, weed infestation, direct habitat alteration." While this is true, it is important to note that there are two potential sources of impacts from oil and gas development, 1) surface disturbances and associated erosion and sedimentation, and 2) contamination from spills and other accidental releases of chemicals and wastes associated with drilling and production and activities. Any development within the watershed of a fish bearing stream introduces the risk of a spill and the resultant impacts to aquatic habitat and fisheries; these impacts can range from minimal to catastrophic depending on the severity or a given spill. These impacts need to be analyzed and a risk assessment provided in the EIS. Moreover, the dual nature of oil and gas impacts emphasize the need for ½ mile NSO buffers for sensitive coldwater fisheries -" the greater the spatial separation between oil and gas development and surface waters, the less chance that a spill will reach and impact a given water body. Elsewhere, land management agencies have recognized that spills are a reality in oil gas development, even with environmental protection measures. The Dixie National Forest's Oil and Gas Leasing EIS (2010) stated: There is at least some indefinable probability that spills or failures in environmental protection measures could occur, with consequent impacts to water resources ranging from negligible to major. The history of oil and gas activities throughout the country indicates that even though improvements have been made in procedures, chemicals used, and environmental protection; unforeseen spills, ruptures, and leaks, can occur. The recent track record of oil and gas companies may be quite good, but it is not perfect -" nor can it be expected to be perfect in the future. Moreover, spills have been shown to travel up to a mile before reaching surface waters. Given that there is no way to completely abate the risk of a spill, the fact that a single incident could wipe out a population of trout, it is important to include this in the impacts analysis.</p>	n	<p>Thank you for the comment.</p> <p>The sentence you reference does not "only consider the effects of sedimentation" it continues to consider the effects of "weed infestation and direct habitat alteration". The addition of oil or chemicals to the water would qualify as a direct habitat alteration. It is understood that Trout Unlimited would push for the highest levels of protection possible on fish bearing streams, particularly streams with high value fisheries or rare populations, however the BLM manages the public lands for multiple use and tries to meet resource objectives with the least restrictive stipulations. In the Billings Field Office, there have been no instances of high value fisheries or rare fish populations, such as the Yellowstone Cutthroat trout, being degraded as a result of oil and gas development activities. In fact, only one stream is listed on the MT DEQ impaired waters list with Oil and Gas development as a causal factor, and this stream is composed of produced waters (Silvertip Creek in Carbon county).</p> <p>The stipulations and mitigation measures required by the BLM to develop federal minerals will be more restrictive than past measures, which have been successful in protecting the resources you are very passionate about.</p> <p>The BLM uses a range of setbacks associated with water and riparian resources of differing value. As sensitive species or habitats are added to or are proximate to a common waterbody, the setback tends to increase and more BMPs are recommended, however, even the lowest levels of protections have succeeded in protecting YCT and other sensitive species from adverse impacts caused by oil and gas development.</p>
DR-MTDK-BL-13-0135-23	Fisheries	<p>Impacts analysis should consider the cumulative effects of climate change At 4-290, the draft EIS states that "Local climate patterns of historic record and related conditions for plant growth would continue during the analysis period." We feel that it is important to not assume impacts based upon historic climate patterns, but rather to base impacts on climate patterns predicted by the best available climate change modeling. Increasing periods of drought, winter flooding, increased severity and occurrence of wildfire, and increasing summer</p>	n	<p>Thank you for this comment. Chapter 2 Climate Change states "Adapting management, to reflect emerging science, projections, and impacts of climate change, allows the BLM to adjust management to best meet the challenges of climate change and is useful for complex processes and where potential impacts are large and could affect multiple resources. Adaptive management strategies are iterative processes where monitoring and assessment refine management. This document is based on current scientific knowledge and</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		temperatures are all compounding factors associated with climate change that will exacerbate aquatic habitat impacts associated with land use activities. Reducing the effects of land use activities (e.g. applying a ½ mile NSO setback versus a ¼ mile NSO set-back) will help to offset the effects of climate change by increasing the resiliency of watersheds that support coldwater fisheries. Conversely, management decisions that result in a higher degree of impacts will intensify the effects of climate change, especially on coldwater fisheries. TU completed a coarse scale analysis (Haak et al. 2010) 2 that analyzed four risk factors with direct implications for coldwater fisheries: summer temperature, persistent drought, increased wildfire, and increased winter flooding. Our assessment used a 3°C increase in air temperature, which is consistent with higher end Global Climate Model projections for the western United States by 2050 (Climate Impacts Group, 2004), to determine the risk to trout populations. The results were summarized by species (including Yellowstone cutthroat trout) and analyzed to determine the likelihood of population persistence based on information drawn from the literature on relationships between persistence and fish abundance, habitat connectivity and patch size for each taxon. The results of this analysis were combined with the results of the coarse filter evaluation to provide a spatially explicit characterization of extirpation risk to native trout populations. Applying this kind of modeling to the Billings Resource Area would allow the BLM to scientifically analyze the effects of climate change on coldwater fisheries, as well as the cumulative effects that would result from additional stressors on the environment caused by land use activities authorized by the BLM. If the planning team has any questions or would like more information about TU's climate change assessment and modeling, please contact us.		understanding, which in the case of climate change, is still emerging. Adaptive management provides for new information to be evaluated and incorporated into project level management decisions, BMPs, mitigation and the decision-making process."
DR-MTDK-BL-13-0135-24	Fisheries	Update references to the Cutthroat Agreement At 1.5.2, the DEIS lists the Conservation Agreement for Yellowstone Cutthroat Trout (1999) under State Plans; the more current Memorandum of Understanding and Conservation Agreement for West slope Cutthroat Trout and Yellowstone Cutthroat Trout in Montana (2007) incorporates and updates the 1999 Conservation Agreement and should replace the 1999 agreement in this section. Additionally at 3.5.8.3, the Affected Environment discussion should incorporate the Cutthroat Agreement by discussing the BLM's commitments as a signatory and also include the goal and objectives of the MOU and agreement. Doing so will provide context and rational for the stipulations developed to protect both existing YCT populations and streams suitable for YCT reintroductions.	n	Thank you, we will update the citing of the newest memorandum. The memorandum is referenced. On pages 2-80 and 2-81 the BLM incorporates key conservation actions from the YCT Conservation strategy directly into management actions common to all alternatives for fisheries management.
DR-MTDK-BL-13-0137-1	Travel Mngt	the identification of "wildlife viewing" as the non-motorized use of interest in Appendix O does not account for the great variety of non-motorized uses. The document should be thoroughly edited to avoid this bias and to fully recognize non-motorized uses as having equal footing with motorized uses.	y	Please refer to Appendix O-157, Specific Recreation Activities. In response to your comment, please refer to "text changes" for Appendix O changes
DR-	Travel Mngt	With regard to Bear Canyon Road in the Pryors, please designate the "washed-	n	In regards to your comment, the RMP has a range of possible decisions. In this

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
MTDK-BL-13-0137-2		out" section of the road (north of section 3, PM1070) as non-motorized. Given the work it would take to re-open the route for safe passage, and given the lack of designated nonmotorized routes, it is a perfect route for this designation.		case, due to the conditions you mentioned the Alternative D has been modified to reflect the current conditions. The route will be designated as "closed" Refer to map 146
DR-MTDK-BL-13-0137-3	Travel Mngt	With regards to "Big Sky Trail" (N-S through the center of section 2, T9S R26E from Horse Haven Rd to the Custer NF boundary fence), please designate this 1-mile stretch as non-motorized. It is currently signed "closed to motor vehicles" and there is a barricade. As the beginning of an increasingly popular hiking route it is a perfect candidate for the non-motorized designation.	n	In regards to your comment, the RMP has a range of possible decisions to make. In this case, the Alternative D decision is for it to remain as "closed". Refer to map 146 The RMP will be changed to reflect that the decision is to designate it as a non-motorized trail.
DR-MTDK-BL-13-0140-1	Coal	Contained within this Basin is the Fort Union Geologic Formation extending from Wyoming into Montana. The Montana portion of the basin contains proven underground coal fields in the Red Lodge, Bear Creek & Grove Creek areas. Scant mention or discussion of these private resources is mentioned in the plan.	N	The text describing the coal development potential of the Red Lodge-Bearcreek coalfield has been enhanced in the Chapter 2, Solid Minerals-Coal section.
DR-MTDK-BL-13-0140-2	Oil and Gas	In review of the BLM - RMP as proposed, it is clear your agency is not adequately considering the economic impact of the decision in any of the alternatives presented in the plan. For over 80+ years many companies have leased oil/gas mineral rights in this area, several have drilled deep test holes. Area oil/gas leasing on BLM would be abolished or severely restricted by this plan with direct effect on adjacent taxable lands which would be closed to leasing. This action would result in \$0 income for the BLM and ultimately the general population in the United States.	n	thank you for your comment.
DR-MTDK-BL-13-0140-3	NEPA	The CEQ has directed agencies to gather data from reliable sources such as interviews and information from local residents which the BLM has failed to do. You did hold the open meetings, but refused to allow public comment at those meetings. How can they be considered public meetings if no public discussions are allowed? I suggest you reschedule the meetings and allow them to be public meetings as required.	N	Thank you for your comment. Non substantive
DR-MTDK-BL-13-0140-4	Coal	Township 8 and 9 South, Range 20 and 21 East, the area of our greatest concern is included on the map from plan appendix M Figure M-3. As one of the many coal owners of coal owned in fee that covers approximately 12,000 acres plus; we are primarily concerned with maintaining the value of our mineral rights in the area known as the Bearcreek Coal area and Grove Creek area located near Bear Creek, MT.	N	Thank you for your comment.
DR-MTDK-BL-13-0140-5	Social/econ	The coal mine(s) would produce significant economic impact amounting to 100's of millions of dollars for Carbon County, the State of Montana and the nation by creating well-paying jobs for hundreds of miners and related personnel.	N	Thank you for your comment. When we receive a plan of development for this project it will be analyzed.
DR-MTDK-BL-13-0140-6	Travel Mngt	Service roads are necessary to operate these production platforms. These roads can be situated to by-pass cultural sites or bird nesting areas without affecting the whole area. Should oil/gas be produced, a pipeline may need to be built to the east across multiple ownerships (including BLM) to connect with existing pipelines. Economic coal transport from these mines could require construction of a railroad line of approximately 25 miles in length to the east, connecting with	n	Thank you for your concerns and your comments. BLM staff have reviewed their program files and determined that your company already has an existing ROW for access, which would not be affected by management decisions in this RMP. In regards to the Rail line ROW which is requested to be addressed in the RMP, issuance of ROWs is a routine operation for BLM and issuance of a specific ROW for a Rail line, a pipeline, or any other access needs would not be

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		the existing BNSF Bridger-Lovell mainline. Obviously, this line would by necessity cross multiple surface ownerships including BLM. But with this EIS, BLM proposes to close many existing roads or trails and to eliminate new roads. A railroad line is not considered or mentioned in the report. I was told that in discussions at the public meetings last month, you indicated we "could apply for a permit for access." We request that a provision for such a permit be included in this EIS. Such a provision is not included in your proposals.		within the scope of this plan. BLM staff is available to meet and discuss this proposal with you; simply contact the office.
DR-MTDK-BL-13-0141-1	WILD HORSES, PMWHR	I would like to see the first bulleted paragraph from Alternative D, which reads: Manage wild horses on approximately 27,094 acres of BLM-administered lands (39,994 acres all ownerships). Designate the closed portions of the Herd Area known as the administrative pastures to be included in the Herd Management Area. Due to private property conflicts, the "buffer" area would remain closed	N	Thank you for your comment
DR-MTDK-BL-13-0141-2	WILD HORSES, PMWHR	Replaced with the first bulleted paragraph from Alternative C, which states: Manage wild horses on approximately 28,622 acres of BLM-administered lands (44,855 acres all ownerships). the entire Herd Area as the Herd Management Area	N	Thank you for your comment, alternative C analyzes the alternative that you are in support of.
DR-MTDK-BL-13-0141-3	WILD HORSES, PMWHR	I recommend this change to Alternative D for the following reasons: By adding this land (see map 33 Alternative C) to the WHR and HMA there can be a higher AML which in effect will reduce the need for gather/removals, and add to the genetic diversity (higher AML) of the herd. I am confident that the current pzp plan will now be having a significant effect on the herd. I am also in full support for range expansion. By opening up the "Sorenson Extension" visitors to the Big Horn Canyon National Recreation Area would be able to view more of the wild horses.	N	Thank you for your comment. Please refer to chapter two alternatives C and D as what is being called the buffer; it is not the administrative pasture, but rather the area between the county road and the external boundary fence.
DR-MTDK-BL-13-0141-4	WILD HORSES, PMWHR	I support the second bulleted paragraph from Alternative D, which states: Same as Alternative A - Within an HMAP, herd structure would be managed for all representation in the herd, not allowing specific colors or bloodlines to dominate from management manipulation. However, I recommend that a close eye be kept on the herd so as to not lose the old bloodlines from years ago that are still represented on the PMWHR. Allowing these horses to remain on the range and reproduce will ensure that these bloodlines will be carried over for years to come. I appreciate the Billings Field Office's efforts in the past for conserving these older bloodlines that exhibit evidence of their Spanish heritage	N	Thank you for your comment
DR-MTDK-BL-13-0146-1	Travel Mngt	. I request that non-motorized routes be designated at the same time as motorized routes are designated in the final RMP	y	In regards to your comment, BLM Manual 1626 (Travel and Transportation) specifies that BLM establish a comprehensive program for both motorized and non-motorized travel. This will be done in this RMP. In regards to your comment, please see "text changes" for changes to Appendix O and the Travel Management Sections in chapters 1, 2, 3, and 4.
DR-MTDK-BL-	Travel Mngt	I request that the Big Sky trail and Bear Canyon Creek Trail be designated only for non-motorized use.	y	In regards to your comment, the RMP has a range of possible decisions to make. In this case, the Alternative D decision is for it to remain as "closed".

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
13-0146-2				Please see map 146 Also note that BLM Manual 1626 (Travel and Transportation) specifies that BLM establish a comprehensive program for both motorized and non-motorized travel. This will be done in this RMP. This trail will be designated as a non-motorized trail.
DR-MTDK-BL-13-0146-3	Travel Mngt	I request the Demijohn Flat route not be open to motorized use	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS
DR-MTDK-BL-13-0146-4	Travel Mngt	I request that Bear Canyon be designated for only non-motorized use beyond the mouth of the canyon.	n	In regards to your comment, the RMP has a range of possible decisions. In this case, due to the conditions you mentioned the Alternative D has been modified to reflect the current conditions. The route will be designated as "closed" to motorized vehicles and as a non-motorized trail Refer to map 146
DR-MTDK-BL-13-0151-1	Travel Mngt	I am asking that the first mile of the trail from the barricade off of Horse Haven up to the USFS fence remain a section used for non-motorized enjoyment. I am also asking that the 1/2 mile between the barricade to the USFS fence in Bear Canyon remain non-motorized.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS. The decision on management for this specific route is manage it as a non-motorized trail except for agency administrative purposes. Refer to map 146 Thank you for your concern and your comments. The Trail from Horse Haven Road and the Bear Canyon Trail in question will be closed to motorized vehicles and designated as non-motorized hiking trails.
DR-MTDK-BL-13-0151-2	Travel Mngt	It also my understanding that Graham Trail and Stockman Trail are being proposed to be open to motorized use. This makes no sense as this will make three parallel motorized trails a short distance from one another. Having these designated as non-motorized will help preserve the Audubon Important Bird Area as well as the riparian habitat in Bear Canyon. It is my fear that if Bear Canyon is open to motorized use it will tear the riparian area up into a giant mud hole.	y	In regards to your comment, BLM Manual 1626 (Travel and Transportation) specifies that BLM establish a comprehensive program for both motorized and non-motorized travel. This will be done in this RMP. In regards to your comment, please see changes to Appendix O and the Travel Management Sections in chapters 1, 2, 3, and 4. The management decision is to leave the Graham Canyon route open for consistency with the adjacent FS Travel designations, while the Bear Canyon Route is closed and designated as a non-motorized trail. Thank you for your concerns and comments. The decision for the Graham Canyon Trail and Stockman Trail are to be designated as "open: so to be consistent with the adjacent FS route designation and to provide access to for range and mineral operators.
DR-MTDK-BL-13-0158-1	Oil and Gas	Proceeding with oil, gas, and/or coal leasing and development -" such as the October 2013 oil and gas lease sale -" is impermissible due to the inherent prejudice that any such action would create on the pending revision of the BiFO	n	Thank you for your comment. With regards to the 2013 Oil and Gas lease sale, only those parcels with no resource concerns were offered for sale. Parcels containing resources (i.e. sage-grouse habitat, fisheries habitat, etc.) on which

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		DRMP. See id. Without the foundational land use planning guidance that is only available through a current and up-to-date RMP, it would be impossible for the BiFO to make the type of fully informed decision that NEPA requires prior to completion of the BiFO RMP revision. BLM must acknowledge this reality -“ that the existing RMP cannot be used to guide current oil and gas leasing and development decision making -“ and announce a moratorium on all oil and gas activity pending the completion of the BiFO RMP revision.		management of those resources would be modified through the RMP process were deferred until after the ROD is signed.
DR-MTDK-BL-13-0158-10	Climate	We reject any notion that the emissions from specific activities in the BiFO DRMP are so small as to warrant a dismissive analysis. The reality of climate change is that it is caused by myriad, specific sources of GHG pollution. For BLM, here, to disavow itself of responsibility for these specific emissions is to condemn us to unabated GHG emissions.	N	See the global warming potential discussion in Section 3.2.2.4 indicating that GHG emissions are being assessed and controlled by oil and gas operators and by multiple agencies.
DR-MTDK-BL-13-0158-11	Air	To suggest that the agency does not, here, have to account for GHG pollution from activity authorized by the BiFO DRMP, is to suggest that the collective 700 million acres of subsurface mineral estate is not relevant to protecting against climate change. This sort of flawed, reductive thinking is problematic, and contradicted by the agency's very management framework that provides a place-based lens to account for specific pollution sources to ensure that the broader public interest is protected. In fact, the climate mitigation opportunity for methane leaking and vented from oil and gas activity on federal lands is significant. Therefore, even though climate change emissions from the Alternatives may look minor when viewed in isolation, when considered cumulatively with all of the other methane emissions from BLM-managed land they become significant and cannot be ignored.	Y	MDEQ regulates many of these sources, as described in Section 1.5.2 of Appendix T. Several types of emission sources mentioned by the commenter do not contribute to actual GHG emissions reported by oil and gas operators under the EPA Greenhouse Gas Mandatory Reporting Rule (40 CFR Part 98, Subpart W) or contribute very small amounts, as discussed in Section 3.2.2.4.4.
DR-MTDK-BL-13-0158-12	Air	The NSPS rules do not cover significant existing sources, such as pneumatic devices or storage tanks. They do not cover completions and recompletions for conventional (non-fracked) wells, or well deliquification (well clean-up, most commonly with plunger lifts). They also do not cover portable or smaller desiccant dehydrators, well-site compressors, pipeline maintenance and repair programs, or leak monitoring and repair programs. There is no justification for assuming that future federal GHG regulations will provide the necessary mitigation for the methane emissions estimated to result from the Alternatives and their contribution to the negative impacts of climate change. Rather, the Draft DRMP must look to actions the BiFO can take as part of this plan to minimize methane emissions.	Y	GHG emissions from oil and gas sources within the planning area are very low and are expected to remain low with maximum development of four wells per year. No oil and gas production companies had sufficient GHG emissions to require reporting under the EPA Greenhouse Gas Mandatory Reporting Rule (40 CFR Part 98, Subpart W) for year 2012, as summarized in Section 3.2.2.4.4. Section B.1 of Appendix B summarizes BLM BMPs to reduce GHG emissions.
DR-MTDK-BL-13-0158-13	Air	The practical applications of BLM's GHG pollution mandate are manifest through the GHG emissions and methane waste that will result from oil and gas development authorized by the BiFO RMP. To this end, BLM certainly does not provide any consideration of the relationship between GHG emissions and the RMP decision made, and fails to address or identify any alternatives or mitigation of GHG emissions from oil and gas development in the BiFO DRMP.	N	SO 3226, NEPA, and FLPMA require the BLM to assess GHG emissions and impacts. GHG emissions from oil and gas sources within the planning area are very low and are expected to remain low with maximum development of four wells per year. No oil and gas production companies had sufficient GHG emissions to require reporting under the EPA Greenhouse Gas Mandatory Reporting Rule (40 CFR Part 98, Subpart W) for year 2012, as summarized in

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		This failure is in direct conflict with SO 3226 as well as BLM's mandate under NEPA, FLPMA, and the MLA.		Section 3.2.2.4.4. Section B.1 of Appendix B summarizes BLM BMPs to reduce GHG emissions.
DR-MTDK-BL-13-0158-14	Air	Indeed, a recent Report released by the Natural Resources Defense Council identified that "[c]apturing currently wasted methane for sale could reduce pollution, enhance air quality, improve human health, conserve energy resources, and bring in more than \$2 billion of additional revenue each year."20 Moreover, the Report further identified ten technically proven, commercially available, and profitable methane emission control technologies that together can capture more than 80 percent of the methane currently going to waste. Id. Such technologies must also be considered in BLM's alternatives analysis, discussed <i>infra</i> .	N	Thank you for your comment. Methane reduction is discussed in Section 3.2.2.4.4 of the RMP, in Section 1.5.2 of Appendix T, and in Section B.1 of Appendix B.
DR-MTDK-BL-13-0158-15	Oil and Gas	As GAO has found, BLM's current waste prevention policies, originally created in 1980, are outdated. That BLM intends to revise its policies does not excuse its failures relative to the specific actions proposed by BLM in this DRMP. This is a fatal deficiency.	n	Thank you for your comment.
DR-MTDK-BL-13-0158-16	Oil and Gas	Considering alternatives to prevent or abate these emissions, in particular through enforceable stipulations required in the RMP to attach to subsequent oil and gas leases, as detailed below, is therefore reasonable and prudent.	n	Thank you for your comment.
DR-MTDK-BL-13-0158-17	Climate	Oil and natural gas systems are the biggest contributor to methane emissions in the United States, accounting for over one quarter of all methane emissions.22 In light of serious controversy and uncertainties regarding GHG pollution from oil and gas development, BLM's quantitative assessment should account for methane's long-term (100-year) global warming impact and, also, methane's short-term (20-year) warming impact using the latest peer-reviewed science to ensure that potentially significant impacts are not underestimated or ignored. See 40 C.F.R. § 1508.27(a) (requiring consideration of "[b]oth short- and long-term effects").	Y	See the global warming potential discussion in Section 3.2.2.4.
DR-MTDK-BL-13-0158-18	Climate	EPA's GHG Inventory -" which BLM currently relies on in its analysis -" assumes that methane is 21 times as potent as carbon dioxide ("CO2") over a 100-year time horizon,23 a global warming potential ("GWP") based on the Intergovernmental Panel on Climate Change's ("IPCC") Second Assessment Report from 1996.24 As a Supplementary Information Report ("SIR") prepared for BLM's oil and gas leasing program in Montana and the Dakotas explains, GWP "accounts for the intensity of each GHG's heat trapping effect and its longevity in the atmosphere" and "provides a method to quantify the cumulative effect of multiple GHGs released into the atmosphere by calculating carbon dioxide equivalent (CO2e) for the GHGs." SIR at 1-2.25 However, substantial questions arise when you calibrate methane's GWP over the 20-year planning and environmental review horizon used in the SIR and, typically, by BLM, including the BiFO. See SIR at 4-1 thru 4-4 (discussing BLM-derived reasonably	Y	See the global warming potential discussion in Section 3.2.2.4. The range of methane contribution to CO2e using a GWP from 21 to 105 is 3 percent to 14 percent.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		<p>foreseeable development potential in each planning area). Over this 20-year time period, the IPCC has calculated that methane's GWP is 72 -" over three times as potent as otherwise assumed by the SIR.26 23 See 78 . 19802, April 2, 2013 (EPA proposal to increase methane's GWP to 25 times CO2). 24 INTERGOVERNMENTAL PANEL ON CLIMATE CHANGE, Second Assessment Report (1996) (attached as Exhibit 48); see also U.S. Environmental Protection Agency, Methane, available at: http://www.epa.gov/outreach/scientific.html (last visited Dec. 20, 2011). 25 BLM, Climate Change, Supplementary Information Report, Montana, North Dakota and South Dakota (2010) available at: www.blm.gov/mt/st/en/prog/energy/oil_and_gas/leasing/leasingEAs.html (last visited Dec. 20, 2011) (attached as Exhibit 49).26 See INTERGOVERNMENTAL PANEL ON CLIMATE CHANGE, Fourth Assessment Report, Working Group 1, Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change, Ch. 2, p. 212, Table 2.14, available at: www.ipcc.ch/publications_and_data/ar4/wg1/en/ch2s2-10-2.html (attached as Exhibit 50). However, recent peer-reviewed science demonstrates that gas-aerosol interactions amplify methane's impact such that methane is actually 33 times as potent as carbon dioxide over a 100-year time period, and 105 times as potent over a twenty year time period.27 This information suggests that the near-term impacts of methane emissions have been significantly underestimated. See 40 C.F.R. § 1508.27(a) (requiring consideration of short and long term effects). Further, by extension, BLM is also significantly underestimating the near-term benefits of keeping methane emissions out of the atmosphere. 40 C.F.R. §§ 1502.16(e), (f); id. at 1508.27. These estimates are important given the noted importance of near term action to ameliorate climate change -" near term action that scientists say should focus, inter alia, on preventing the emission of short-lived but potent GHGs like methane while, at the same time, stemming the ongoing increase in the concentration of carbon dioxide.28 These uncertainties -" which BLM has left unaddressed in prior NEPA analysis -" necessitate analysis in the BiFO DRMP. 40 C.F.R. §§ 1508.27(a), (b)(4)-(5).</p>		
DR-MTDK-BL-13-0158-19	Climate	<p>While dispersed, oil and gas development is nonetheless a massive, landscape scale industrial operation -" one that just happens to not have a single roof. BLM, as the agency charged with oversight of onshore oil and gas development, therefore has an opportunity to improve our knowledge base regarding GHG emissions from oil and gas production, providing some measure of clarity to this important issue by taking the requisite "hard look" NEPA analysis before selling and executing oil and gas leases.36 36 In this context, the 2010 SIR, while providing a basic literature review of GHG emissions sources, is merely a starting point for BLM's responsibility to take a hard look at GHG emissions in the context of foreseeable drilling operations in the geologic formations proposed</p>	y	<p>GHG emissions from oil and gas sources within the planning area are very low and are expected to remain low with maximum development of four wells per year. No oil and gas production companies had sufficient GHG emissions to require reporting under the EPA Greenhouse Gas Mandatory Reporting Rule (40 CFR Part 98, Subpart W) for year 2012, as summarized in Section 3.2.2.4.4. Section B.1 of Appendix B summarizes BLM BMPs to reduce GHG emissions.</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		for leasing.		
DR-MTDK-BL-13-0158-2	Air	Research indicates a strong correlation between oil and gas development and increased ozone concentrations - " particularly in the summer when warm, stagnant conditions yield an increase in O3 from oil and gas emissions. Marco A Rodriguez, et al., Regional Impacts of Oil and Gas Development on Ozone Formation in the Western United States, JOURNAL OF AIR & WASTE MANAGEMENT ASSOCIATION (Sept. 2009) (attached as Exhibit 111). Particularly in areas of significant existing oil and gas development -" such as the area researched by Rodriguez, the San Juan Basin in the Four Corners region, but also relevant, here - " "peak incremental O3 concentration of 10 ppb" have been simulated. Id. at 1118. This study indicates a "clear potential for oil and gas development to negatively affect regional O3 concentrations in the western United States, including several treasured national parks and wilderness areas in the Four Corners region. It is likely that accelerated energy development in this part of the country will worsen the existing problem." Id. Although these findings are based on a case study in the Four Corners region, the applicability of this research is far broader and should be considered by BiFO, here.	N	As discussed in Sections 3.2.1.3 and 3.2.1.7, ambient air quality data from ozone monitors near the planning area indicate ozone concentrations that are no more than 75 percent of the ozone NAAQS. The ARMP in Appendix T provides a process to manage ozone impacts from future growth in oil and gas activity.
DR-MTDK-BL-13-0158-20	NEPA	The myriad impacts that will result from the BiFO RMP decision making must be considered within the context of resiliency. Although the BiFO DRMP recognizes the threat of climate change, the agency's decision making is not reflective of this harm and fails to take any steps to ameliorate the impacts to communities, landscapes, and species. To the contrary, the BiFO DRMP's preferred alternative would open up extensive lands to oil and gas leasing.	N	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS. Please see Tables 2-5 and 2-6.2 and Appendix C for the restrictions placed on oil and gas leasing.
DR-MTDK-BL-13-0158-21	Water	The BiFO does not even address the environmental impacts from hydraulic fracturing in the DRMP. The BiFO implies that hydraulic fracturing may occur, explaining that horizontal wells "are drilled to increase the recovery oil and gas reserves from vertically fractured reservoirs, or reservoirs with directional permeability." DRMP at D-9. Otherwise the BiFO makes no mention of hydraulic fracturing. As discussed in more detail below, fracking may create seismic risks, and negatively impact water quality and quantity, air quality, wildlife, and human health. Yet, the agency's decision making is not reflective of this potential harm, and fails to sufficiently analyze impacts, providing, only, that "[b]est management practices, state, and federal guidance concentrate on protecting water quality." Id. at 3-39; see also Center for Biological Diversity v. Bureau of Land Management, No. C 11-006174 PSG (N.D. Cal. 2011), Doc. No. 45 (Order concluding that NEPA review was inadequate and specifically referenced BLM's failure to adequately analyze groundwater contamination impacts). Given the weight of both new and old evidence documenting the risk of water contamination from gas drilling across the country, BLM's approach is becoming increasingly untenable, in particular given the absence of any scientific analysis	n	Thank you for your comment. There is no fracking currently occurring in the Billings Field Office and it is unlikely to occur. Language has been added to Chapter 3 to address your concerns. The RFD for the B&PPNM plan revision is 4 wells per year occurring on BLM managed federal mineral estate per year. There are no high potential oil and gas development areas occurring in the federal mineral estate. Full-scale would be four wells per year.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		that conclusively finds that these documented problems do not exist in the area of the proposed lease sale. Indeed, even an industry report prepared for Gunnison Energy Corporation - " a major oil and gas developer - " has acknowledged the potential for significant impacts to water resources from fracking. ⁷² The simple fact of the matter is that natural gas development has the potential for poisoning our water with toxic, hazardous, and carcinogenic chemicals as well as naturally occurring radioactive radium, and BLM must provide a thorough analysis of these potentially significant impacts in the BiFO DRMP. Here, BLM has failed to provide this hard look analysis.		
DR-MTDK-BL-13-0158-22	Oil and Gas	In preparing its NEPA analysis for the BiFO DRMP, BLM must catalogue the substances that will be used or are reasonably likely to be used in fracking on the parcels made available in the RMP. In order to make this information accessible to the public, BLM should categorize these substances as hazardous, toxic, carcinogenic, or benign.	n	Thank you for your comment.
DR-MTDK-BL-13-0158-23	Oil and Gas	The threat of seismic activity induced from oil and gas development practices must be considered in the BiFO DRMP. Here, the BiFO provides no analysis of seismic hazards. This dismissive approach is inadequate. As noted above, Ohio officials placed a five-mile buffer around waste injection wells. Given the recognized correlation between oil and gas development practices and the inducement of earthquakes, taking such a precautionary approach, here, through stipulations at the RMP stage is prudent and would help stem potential future impacts. At the very least, however, BLM must take a hard look at possible seismicity impacts in the planning area.	n	Thank you for your comment. However, while noting that, while rare, [g]eologic hazards within eastern Montana consist primarily of threats from earthquakes,• Draft EIS at 3-124, and that [s]eismic surveys are a critical part of exploration for oil and gas resources,•
DR-MTDK-BL-13-0158-24	Oil and Gas	emissions from oil and gas development are not limited only to combustion, rather they occur throughout the chain of production -" with some of the greatest emissions occurring at the point of extraction. These impacts are a consequence of various stages of oil and gas development -" from the drilling and fracking of oil and gas wells, to air quality impacts and the release of hazardous emissions. The BiFO DRMP has failed to sufficiently address and analyze these impacts, representing a major failure of the subject EIS.	n	See Chapter 4, Air, alternative-specific sections. Emissions from non-combustion sources are included in the emission inventories provided for each Alternative. Detailed emission inventories are provided in the Air Resource Technical Support Document available online on the RMP webpage. Air resource impacts associated with these emissions are explained in Chapter 4, "Air Resources and Climate".
DR-MTDK-BL-13-0158-25	Oil and Gas	The rapid development of high volume/horizontal drilling in conjunction with hydraulic fracturing has driven expansion of new sources resulting in increased emissions -" a change that requires consideration in the BiFO DRMP. Notably, EPA has, thus far, decided that it will not regulate methane emissions directly, suggesting an important and necessary role for BLM.	n	Thank you for your comment. There is no fracking currently occurring in the Billings Field Office and it is unlikely to occur. Language has been added to Chapter 3 to address your concerns. The RFD for the B&PPNM plan revision is 4 wells per year occurring on BLM managed federal mineral estate per year. There are no high potential oil and gas development areas occurring in the federal mineral estate. Full-scale would be four wells per year.
DR-MTDK-BL-13-0158-26	Oil and Gas	As BLM proceeds with the BiFO DRMP and evaluates public land management throughout the Billings area, including opening federal lands to oil and gas development and hydraulic fracturing, it must consider the human health impacts associated with these extractive practices.	n	See Chapter 4, Social Conditions for a discussion on effects anticipated from BLM's proposed actions.
DR-	Oil and Gas	The health problems and uncertainties that proliferate in communities where oil	n	The Clean Air Act's regulations impose extensive actions after ambient air

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
MTDK-BL-13-0158-27		and gas development takes place warrants the further collection of data and research, as contemplated under NEPA, before such development can be made possible by the BiFO DRMP. NEPA requires a hard look at these myriad impacts, which the Draft EIS fails to sufficiently offer.		quality monitoring indicates violations of the NAAQS and exposure of the public to unhealthy air quality. As explained in Appendix T, Section 1.5.3, the BLM operates under FLPMA and NEPA mandates to protect air resources and prevent violations of the Clean Air Act. As described in Appendix T, Section 4.1, the BLM will use only quality-assured monitoring data when determining mitigation design values and will confer with the MDEQ and EPA concerning these values.
DR-MTDK-BL-13-0158-28	Air	For example, the BiFO DRMP does recognize health impacts from hazardous air pollutants ("HAPs") -" which "are defined by USEPA as toxic air pollutants that are known or suspected to cause cancer or other serious health effects, such as reproductive effects or birth defects, or adverse environmental effects" -" and "[m]odeled impacts were compared to established health-based thresholds to determine the incremental increase in risk associated with the proposed activities." DRMP at 3-17. The BiFO only examined acute (typically 1-hour) and chronic (one-year) exposures for benzene, ethyl benzene, formaldehyde, n-hexane, toluene, and xylene. Id. at 4-17, 18, Table 4-10. The BiFO concluded that "acute HAP modeling impacts were well below the REL [Reference Exposure Levels]" and "[m]aximum predicted cancer risks for all modeled scenarios and HAPs are below an incremental increase in cancer risk of 1 per million." Id. at 4-19. The Conservation Groups cannot assess these conclusions when the BiFO does not disclose any of its analysis. The BiFO states that "[a]dditional HAP modeling results are included in the ARTSD [Air Resources Technical Support Document] (BLM 2013)." Id. at 4-17. However, no such ARTSD was provided, and the DRMP notes that a draft ARTSD will not be completed until 2015. Id. at T-12. BiFO has also failed to disclose how it calculates its Reference Exposure Levels (RELs) beyond stating that RELs are "established health-based thresholds." Id. at 4-17. The BiFO provides no information on who established these standards, whether these standards take sensitive human subpopulations, livestock, or wildlife into account, or whether near-field air pollution for gas drilling will impact nearby communities or users in the planning area.	n	The Clean Air Act's regulations impose extensive actions after ambient air quality monitoring indicates violations of the NAAQS and exposure of the public to unhealthy air quality. As explained in Appendix T, Section 1.5.3, the BLM operates under FLPMA and NEPA mandates to protect air resources and prevent violations of the Clean Air Act. As described in Appendix T, Section 4.1, the BLM will use only quality-assured monitoring data when determining mitigation design values and will confer with the MDEQ and EPA concerning these values.
DR-MTDK-BL-13-0158-29	Water	The resource development proposed by the BiFO DRMP has significant potential to contaminate groundwater resources in the Billings area. Ground water is "the primary source of drinking water for Montanans who live outside city boundaries, as well as those who are on public water systems," and is a vital component of the hydrological system, impacting area streams, rivers, wetlands, and riparian areas. DRMP at 3-39. Yet, the agency's decision making does not consider fracking impacts on these resources, providing, only, that "[b]est management practices, state, and federal guidance concentrate on protecting water quality." Id. at 3-39; see also <i>Center for Biological Diversity v. Bureau of Land Management</i> , No. C 11-006174 PSG (N.D. Cal. 2011) (concluding that	y	Drinking water sources are protected through a number of stipulations, including but not limited to a new stipulation developed to conserve Source Water Protection Areas.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		NEPA review was inadequate and specifically referenced BLM's failure to adequately analyze groundwater contamination impacts).		
DR-MTDK-BL-13-0158-3	Air	There are a number of Class I air quality areas that may be directly impacted by any development authorized by the BiFO DRMP. These areas include, but are not necessarily limited to the following: North Absaroka Wilderness, Northern Cheyenne Indian Reservation, U.L Bend Wilderness Area, Wind Cave National Park, and Yellowstone National Park. BLM, Draft Resource Management Plan and Environmental Impact Statement for the Bureau of Land Management (BLM) Billings and Pompeys Pillar National Monument RMP REVISION ("BiFO DRMP), 3-14 (2013). However, BiFO failed to consider visibility impacts to other areas subject to the nonimpairment mandate. These areas include the Pryor Mountain, Twin Coulee, Big Horn Tack On, and Burnt Timber WSAs.	n	Visibility impacts to Class I areas and areas identified by Federal Land Managers as sensitive Class II areas have been assess qualitatively in the PRMP. Additional visibility analysis will be performed as part of the photochemical grid modeling described in Section 5.0 of Appendix T. The Wilderness Study Area (WSA) nonimpairment mandate applies to activities that are located within a WSA. Visibility impacts to WSAs do not need to be assessed since they are not Class I areas and have not been designated as sensitive Class II areas by the BLM.
DR-MTDK-BL-13-0158-30	Water	In preparing its NEPA analysis of the BiFO DRMP, BLM must address the direct, indirect, and cumulative impacts to groundwater, 40 C.F.R. § 1508.25(c), giving particular scrutiny to the potential for contamination of groundwater supplies.	n	When issues are identified, analysis of potential impacts is initiated. Therefore, if impacts to groundwater are identified as an issue, they will be analyzed. Impacts to ground water would more appropriately be analyzed during project level NEPA, when a specific proposed action is established. Without a proposed action and project area, it is not feasible to accurately depict impacts to resources.
DR-MTDK-BL-13-0158-31	Water	In its NEPA analysis, BLM must address whether the oil and gas development will affect any high quality waters or whether it will degrade any existing uses. BLM may not evade its NEPA duty to consider these impacts by asserting that other agencies may issue discharge permits. 40 C.F.R. §§ 1502.14(f), 1502.16(h).	n	The BLM does not avoid requirement of NEPA. During project specific analysis, scoping identifies potential impacts to the environment, which are then analyzed and determined to be significant or not. The BLM manages land uses, and through agreements with the state and other federal agencies, makes decisions to help maintain standards that are generally set by MT DEQ, with regard to water quality. MT DEQ regulates discharge waters, therefore permits them and monitors them for compliance.
DR-MTDK-BL-13-0158-32	Water	As applied to the BiFO DRMP, the BiFO must consider the current and potential impacts of authorizing additional oil and gas and coal development. The DRMP fails to sufficiently analyze these impacts. Not only is BLM mandated to follow antidegradation and water quality standards under the CWA and state law, but it must also take a NEPA "hard look" at any impacts that may be related to these water quality standards as well. Here, the BiFO provides only that "impacts from surface disturbance and NPS [non-point source pollution] associated with fluid mineral development can adversely impact water quality by increasing sediment loads or chemical pollution with overland flow from development sites." 4-85. To control these impacts, BiFO would apply "appropriate stipulations to oil and gas leases would minimize impacts to riparian and water resources." Id. These stipulations include "NSO [No Surface Occupancy] with various buffers to riparian areas, water bodies, streams, wetlands, and special status plant and wildlife species." Id. BLM would also use "riparian vegetation, riparian health, and upland health as primary indicators of water quality." Id. This analysis is insufficient and fails to take the hard look that NEPA demands. BiFO's statement	n	NEPA analysis per lease sale and at the project level would take a hard look at impacts to water quality, specific to a site. The RMP is not used to disclose every impact possible from any potential development in the field office... those impacts are delineated at the project level. Without a specific proposed action and a project location, it is not feasible to accurately determine impacts from oil and gas development. Impacts from hydraulic fracturing will be identified during project level NEPA analysis. It is not feasible to develop impact scenarios planning area wide, with the relatively low RFD in BiFO; time and budget is better spent on higher priorities with immediate need. Hydraulic fracturing has not been an issue in BiFO and will be analyzed in detail when proposed. BiFO does not rely only on riparian vegetation indicators, only partially. PFC

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		that water quality may suffer from sediment and chemical pollution is cursory and provides no analysis on how it may suffer. See DRMP at 4-85. Moreover, none of BiFO's stipulations would minimize water quality impacts from fracking waste and its monitoring program may not even detect these impacts. On this second point, BiFO's water quality monitoring relies on riparian vegetation rather than in-stream indicators because "[r]iparian vegetation is a valuable indicator of potential livestock effects" and in-stream indicators would not provide "rapid feedback and may result in unacceptable impacts." Id. at 4-79. BiFO's monitoring program should not be tailored only to livestock effects; instead, the BiFO should examine waterways within its planning area and consider whether in-stream indicators should be used to detect fracking and other oil and gas wastes.		assessments use a number of indicators to evaluate riparian system health and function. Riparian function is a valuable indicator of water quality. BLM/DEQ MOU with discusses these functional assessments as early indicators and how riparian trends can serve as an indicator of water quality trends. The PFC manual applies to all public land uses, not only livestock grazing impacts. The MT DEQ 303d list shows only one degraded water source with a causal of O&G development/produced water. (Silvertip Cr). Methods to identify impacts early on are being developed.
DR-MTDK-BL-13-0158-33	Water	Here, in its NEPA analysis BLM must closely assess the direct, indirect, and cumulative impacts of lease development on water supplies from oil and gas operations. 40 C.F.R. §§ 1508.7, 1508.8. This analysis must consider the potential sources of water that would be used for oil and gas development, and the impacts of these water withdrawals on water availability for drinking, agriculture, and wildlife. The analysis must further address the impacts to water quantity at different annual, seasonal, monthly, and daily time scales because the impacts of such water withdrawals could be more acute during times, months, and seasons of scarcity. For example, increased withdrawal and irretrievable contamination of waters will be particularly harmful during times - "like the present -" when much of the state is experiencing drought conditions. 118 As noted above, the BiFO DRMP fails to provide any analysis or recognition of significant water quantity issues associated with oil and gas development, representing a fundamental shortcoming in the DRMP.	n	Water resources have not been a contentious issue in the BiFO, particularly during analysis of oil and gas development activities. This is evidenced through the MT DEQ 303d list of impaired water bodies. This list shows one stream in the BiFO that is impaired, with oil and gas development listed as its causal factor. This particular stream, Silvertip Creek, is in a historic oil and gas field that has seen development during times of little to no regulation. Furthermore, it is not feasible to analyze the impact to water resources on a planning area scale with the low RFD scenario; the vast differences in site location and project activities creates too broad an analysis scale. The impacts to water quality, be it surface or ground, is best analyzed during project specific NEPA analysis when a proposed action and location are established, allowing resource specialists to accurately depict the affected environment and potential impacts. Furthermore, scoping at this level (project specific) allows internal and external sources to develop relevant issues to be considered in analysis, instead of broadly applying general issues to an entire landscape. Additionally, MT DEQ regulates the availability of water resources for industry use.
DR-MTDK-BL-13-0158-34	Wildlife	The BiFO identify numerous threatened and endangered species within the planning area, including black-footed ferret (<i>mustela nigripes</i>), Canada lynx (<i>Lynx canadensis</i>), and grizzly bear (<i>Ursus arctos horribilis</i>), as well as bird species such as the whooping crane (<i>Grus americana</i>). DRMP at 3-76. Despite BLM's recognition that these species are present in the Billings planning area, the DRMP fails to provide sufficient analysis regarding possible impacts to these protected species. For the grizzly bear, Canada lynx, and whooping crane, the agency provides only that "no impacts are expected to occur." Id. at 4-241. For	n	Thank you for the comment. Refer to Table2-6.1, page 2-68, under Wildlife Habitat- Management Common to All Alternatives, the statement "Assist in the restoration, reintroduction, augmentation, or re-establishment of T & E, special status, and priority species and other populations" etc. BLM has consulted and will continue consultation with the U.S. Fish and Wildlife Service, Endangered Species Office on the DRMP impacts to endangered species. A biological assessment and Backlog Consultation was

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		black-footed ferret, which is considered the rarest mammal in North America, the BiFO states only that "[o]il and gas leasing and development activities would be allowed after the conclusion of surveys for black-footed ferrets" and "in the absence of black-footed ferrets, oil and gas leasing, development and exploration and geothermal operations would not be allowed within 1/2 mile of black-tailed and white-tailed prairie dog colonies active within the past 10 years." Id. at 4-261. Such dismissive and lax treatment of these protected species is insufficient under the procedural and substantive standards established in the ESA.		completed in 2007 and 2008 for those species. BLM will also consult with USFWS through a Biological Assessment on the Final RMP.
DR-MTDK-BL-13-0158-35	Social/econ	In the instant case, authorizing 606,096 acres (under preferred Alternative D) acres in the BiFO DRMP to oil and gas development and its ensuing infrastructure -" which includes the construction of well pads, evaporation ponds, roads, power lines, and pipelines -" clearly will represent a dramatic and community altering change to the physical environment. The impacts that this development will have on the traditional rural, ranching, and native communities must be sufficiently identified in the DRMP.	n	The oil and gas development potential for BiFO is low to moderate (see map 24). The RFD for BiFO (federal leases) is 4 wells per year (total). No text revision necessary (Thanks for the comment. Resource outputs are the amount of a resource (e.g., AUMs, recreation visits, tons of locatable minerals, etc.) that would be available for use under each alternative. Resource specialists projected annual resource outputs based on the best available information and professional judgment. Based upon public comments, resource specialists have reviewed assumptions used in this analysis to see if they need to be changed or updated. These revised assumptions have been incorporated into the analysis contained in the DEIS. The purpose of the economic analysis is to compare the relative impacts of the alternatives and should not be viewed as absolute economic values. Previous modeling experience has shown that the data contained in the IMPLAN modeling system for the various sectors are accurate representations of impacts.)
DR-MTDK-BL-13-0158-36	Oil and gas	NEPA requires the BiFO to look at the cumulative impacts of the proposed action. See 40 C.F.R. § 1508.25. Failure to include cumulative impacts of all the mineral development authorized by the BiFO DRMP segments the process of oil and gas development into many mini- NEPAs. This practice, in turn, has the effect of hiding the fact that the cumulative impacts of all the segments are significant. Historically, BLM has failed to analyze the impacts of the authorized oil and gas development in the BiFO DRMP with the already permitted activities in the vicinity of the project. Under NEPA, BLM "must analyze not only the direct impacts of the proposed action, but also the indirect and cumulative impacts of - "past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such actions." Wyoming v. U.S. Dept. of Agriculture, 661 F.3d 1209, 1251 (10th Cir. 2011) (citing Colorado Environmental Coalition v. Dombeck, 185 F.3d 1162, 1176 (quoting 40 C.F.R. § 1508.7)); see also 40 C.F.R. § 1508.25 (c) (stating that the "scope" of an EIS includes consideration of "cumulative" impacts).	n	Thank you for your comment. Please review the fluid minerals section in Chapter 3 and the RFD. The RFD for the B&PPNM plan revision is 4 wells per year occurring on BLM managed federal mineral estate per year. There are no high potential oil and gas development areas occurring in the federal mineral estate. Full-scale would be four wells per year.
DR-MTDK-BL-13-0158-	Oil and gas	The cumulative impacts to the landscape of energy development in the region have already left scars, and the potential for further development threatens greater impacts to the area. Compounding the problem, BLM has historically	n	Thank you for your comment.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
37		failed to consider the cumulative impacts of extractive mineral development together. For example, mining activities add to the cumulative impacts of oil and gas development, including impacts to air and water quality, habitat destruction and fragmentation, and loss of wild areas and the aesthetic, recreational, and spiritual benefits derived therefrom.		
DR-MTDK-BL-13-0158-38	Air	In addition to the cumulative land disturbance from energy development in the region, BLM has failed to consider the cumulative impacts of air pollution caused by this development.	n	Cumulative impacts of energy development activities on air resources are described in Chapter 4, Air Resources, and in the Air Resource Management Plan (Appendix T). Cumulative air pollution impacts are addressed qualitatively based on available data.
DR-MTDK-BL-13-0158-39	Air	In addition to the cumulative effects of conventional air pollution, energy development in the region is causing significant GHG pollution in the form of methane emissions -“ the impacts of which were detailed, above. BLM has historically, and here, failed to consider the methane emissions of oil and gas development and its contribution to climate change. BLM has added to this error by failing to consider the cumulative methane emissions throughout the BiFO area. BLM must consider the cumulative impacts of oil and gas and coal development in the area.	n	GHG emission emissions from BLM-authorized activities are included in Chapter 4, Climate Change, alternative-specific emission inventories and Appendix Y.
DR-MTDK-BL-13-0158-4	Air	By authorizing the development of coal bed methane and the 606,096 acres (under preferred Alternative D) for oil and gas development, the BiFO must analyze air quality, human health, and compliance or interference with the EPA's Regional Haze rules in greater detail.	n	Section 4.1.1 analyzes air quality, human health, and visibility impacts at a level appropriate for the small emission increases associated with oil and gas activity under the alternatives.
DR-MTDK-BL-13-0158-40	NEPA	BLM must ensure that it has adequate baseline data to determine impacts, rather than basing impacts only on incremental additions to the already significant development occurring within the Billings planning area.	N	Thank you for your comment.
DR-MTDK-BL-13-0158-41	NEPA	Accordingly, the BiFO RMP revision must consider, on equal footing, the value of permanent protection and preservation of public lands in the Billings planning area, along with industry pressure to lease and develop these lands. The RMP revision process is the perfect opportunity for BLM to re-evaluate these competing resources and give suitable weight to FLPMA's mandate to, where appropriate, preserve and protect public lands in their natural condition. See 43 U.S.C. § 1701(a)(8).	N	Thank you for your comment.
DR-MTDK-BL-13-0158-42	Oil and Gas	For example, oil and gas development in the Bakken Shale formation in northwestern North Dakota has, given current relative market prices, focused on oil production. However, significant quantities of associated natural gas have been produced in conjunction with oil, and “[c]ompanies that build pipelines and gas-processing plants simply cannot keep up.” ¹²¹ As a result, “[t]he upshot is flaring, and lots of it. North Dakota’s flaring rose more than sixfold between 2006 and 2011,” and roughly 30% of natural gas is still currently being flared according to the North Dakota Industrial Commission. ¹²² Given this tremendous waste of a public resource and the lack of gathering and boosting infrastructure	n	Thank you for your comment.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		in the public lands administered by the BLM, we believe that alternatives should be considered that either require gas reinjection, or closes public lands to oil and gas development until either such infrastructure is in place or development is planned to ensure that such infrastructure will be in place to accommodate the pace of oil and gas development.		
DR-MTDK-BL-13-0158-43	NEPA	While certain lands may indeed be appropriate for responsible oil and gas leasing and development, it is equally evident that there are lands where other resource values should prevail. FLPMA affords BLM great authority to appropriately balance these competing interests, which expressly includes the responsibility to "preserve and protect certain public lands in their natural condition." 43 U.S.C. § 1701(a)(8). Moreover, FLPMA further delegates BLM authority to permanently withdraw lands from consideration. See 43 U.S.C. § 1714. This ability authorizes the Secretary to "make, modify, extend, or revoke withdrawals." Id. In either event, BLM's BiFO cannot continue its practice of prioritizing oil and gas leasing and development above the other resource values at stake. The BiFO RMP revision process should be used to provide a framework where BLM can more fully realize its multiple use mandate now and into the future.	N	Thank you for your comment. The BLM's multiple-use mission and the BLM's obligation to comply with the Federal Land Policy and Management Act of 1976 (FLPMA) and all other applicable laws, regulations and policies are addressed in Chapter 1 of the RMP/EIS.
DR-MTDK-BL-13-0158-44	WSR	The BiFO does not justify why Wild and Scenic River Act (WSRA) eligible river segments in the DRMP vary under the RMP Alternatives. The WSRA establishes, as a national policy, that rivers, which "possess outstandingly remarkable scenic, recreational, geologic, fish and wildlife, historic, cultural, or other similar values, shall be preserved in free-flowing condition," and "their immediate environments shall be protected for the benefit and enjoyment of present and future generations." 16 U.S.C. § 1271.	n	Thank you for your review of the draft RMP and your comments. The BiFO did do a Suitability Study as part of this planning effort. It appears that the document was inadvertently left out of the document. It has been inserted into Appendix R, after the Eligibility Study Report.
DR-MTDK-BL-13-0158-45	WSR	Although the BiFO has not completed its suitability determination, it has varied the number of suitable river segments under its proposed Alternatives. "Under Alternative B, the seven eligible river segments (14.08 miles) would be recommended as suitable for inclusion in the National Wild and Scenic River System to protect their outstandingly remarkable values and free-flowing nature." DRMP at 2-31. Under Alternative D (the preferred alternative), "only two river segments (3.15 miles) would be recommended and suitable for inclusion in the National Wild and Scenic River System." Id. at 2-36. Under Alternatives A and C, none of the eligible segments would be recommended under the system, but they would be managed to protect their ORVs. Id. at 2-29, 2-34. The BiFO provides no explanation for these different alternatives or how it reached a determination that two, seven, or none of the rivers are WSRA suitable. The BiFO must provide an explanation, particularly when it has not yet completed the suitability analysis. Id. at 3-223.	n	Thank you for your review of the draft RMP and your comments. The BiFO did do a Suitability Study as part of this planning effort. It appears that the document was inadvertently left out of the document. It has been inserted into Appendix R, after the Eligibility Study Report.
DR-MTDK-BL-	Air	it is critical that the BiFO takes a hard look in the RMP at methods to reduce GHG emissions and at how authorizations and management activities will	Y	The BLM reviewed GHG emissions, based on new data from the USEPA's Greenhouse Gas Mandatory Reporting Rule (MRR). No operators of oil and

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
13-0158-46		ensure implementation of feasible GHG emission reduction strategies.		gas production facilities reported GHG emissions under the EPA's GHG Mandatory Reporting Rule (MRR), as summarized in Section 3.2.2.4.4. The BLM also identified MDEQ regulations that would reduce methane from a variety of sources in Section 1.5.2 of Appendix T. Finally, Section B.1 of Appendix B, "Air Resource BMPs" provides a list of BMPs that would reduce GHG emissions.
DR-MTDK-BL-13-0158-47	Air	The BiFO's decision to wait to address GHG emissions at the APD stage, while ignoring them at the RPM and subsequent leasing stages, however, is a fatal flaw. It is unreasonable for the BiFO to suggest that it cannot address methane and other GHG emissions at the RMP stage; to suggest otherwise misleads the public into a false sense of confidence that the BiFO will adequately assess environmental impacts at the APD phase. NEPA requires BiFO to adequately analyze and disclose methane and GHG emissions and impacts for drilling on the federal mineral estate. To then segment environmental review on a case-by-case basis would misconstrue the total environmental impact of oil and gas drilling in the planning and development areas by only analyzing a single well's emissions	y	Thank you for your comment. The BLM reviewed and analyzed GHG emissions from oil and gas sources and determined that BMPs are sufficient to address GHG emissions after accounting for the quantity of GHG emissions and the effect of federal and state regulatory programs.
DR-MTDK-BL-13-0158-48	Air	Worse, by segmenting NEPA review, the DRMP risks establishing a process for oil and gas development that never requires the BiFO to fully analyze methane or other GHG emissions. BLM is authorized to categorically exclude oil and gas drilling development, so long as the surface disturbance is less than five acres, the total surface disturbance on the lease is not greater than 150 acres, and site-specific analysis has been previously completed pursuant to NEPA. 42 U.S.C. § 15942. None of the forecasted drilling sites in the DRMP exceed these acreage limitations. DRMP at 4-423. BiFO cannot tier to the DRMP because, as discussed previously, it has not taken the requisite hard look at oil and gas development emissions. Should BiFO attempt to do so, however, the BiFO may never meaningfully apply the BMPs. Indeed, the BiFO has already demonstrated a lack of attention to methane emissions and reductions.	y	Thank you for your comment. The BLM reviewed GHG emissions, based on new data from the USEPA's Greenhouse Gas Mandatory Reporting Rule (MRR). No operators of oil and gas production facilities reported GHG emissions under the EPA's GHG Mandatory Reporting Rule (MRR), as summarized in Section 3.2.2.4.4. The BLM also identified MDEQ regulations that would reduce methane from a variety of sources in Section 1.5.2 of Appendix T. Finally, Section B.1 of Appendix B, "Air Resource BMPs" provides a list of BMPs that would reduce GHG emissions.
DR-MTDK-BL-13-0158-49	Air	Considerable information is available to the BiFO on ways to reduce methane emissions, and the agency has ample means, including binding commitments in the DRMP, lease stipulations, and conditions on approval to drill, that would ensure that such authorizations and management activities do implement feasible GHG emission reduction strategies. Much of this information is in fact contained in official documents of the BLM.	n	The BLM reviewed GHG emissions, based on new data from the USEPA's Greenhouse Gas Mandatory Reporting Rule (MRR). No operators of oil and gas production facilities reported GHG emissions under the EPA's GHG Mandatory Reporting Rule (MRR), as summarized in Section 3.2.2.4.4. The BLM also identified MDEQ regulations that would reduce methane from a variety of sources in Section 1.5.2 of Appendix T. Finally, Section B.1 of Appendix B, "Air Resource BMPs" provides a list of BMPs that would reduce GHG emissions.
DR-MTDK-BL-13-0158-5	Air	For example, the BiFO fails to take a hard look at VOC air quality visibility impacts in the planning area. The BiFO recognizes that VOC emissions contribute to ozone formation but does not take these emissions into account when considering visibility. See DRMP at 4-20, 22. Instead, the BiFO only	y	The visibility discussion has been modified to include VOC emissions.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		<p>considered SO₂, NO_x, and PM 2.5. DRMP at 4-22, 4-36. After assuming that the rise in these three pollutants would be low, see id., the BiFO concluded that the alternatives' "[p]otential visibility impacts are likely to be small," id. at 4-22, and cumulative impacts to visibility are likely to be "moderate," id. at 4-36. These qualitative statements, however, ignore anticipated VOC emission increases. RMP authorized activities are expected to increase VOCs by 3.6% and cumulative emissions in the area are expected to increase VOCs by 14.6%. Id. at 4-20, 36. Oil development and production accounts for the bulk of these VOC emissions. See id. at 4-28, 30, 31, 33; see also id. at 4-35 (noting, however, these estimates exclude coal mining emissions). Moreover, under this methodology, BiFO fails to examine visibility impacts for nonimpairment areas in the planning area. By failing to analyze these sensitive areas or VOC impacts on visibility, BLM has ignored its obligations under NEPA.</p>		
DR-MTDK-BL-13-0158-50	Air	<p>The first set of BMPs that the BiFO must consider including as stipulations in the RMP process are the BMPs included in the DRMP Best Management Practices Appendix. DRMP at B-1, et seq. Air quality measures include: ? Electrifying equipment when feasible; ? Achieving high levels of emission control by installing and operating low emission equipment (i.e., drill rig engines with emissions at least as low as Tier 4 engine standards) or operating older equipment that has been retrofitted with additional emission controls such as nonselective catalytic reduction or catalytic oxidation; ? Using natural gas or electric engines rather than diesel engines; ? Using alternative energy (solar power, wind power, or both) to power new water source developments; ? Converting power sources at existing water well developments to alternative energy sources. ? Using green completion technology to capture methane (and some VOC and HAP) emissions during completion and place the gas in sales pipelines; ? Using flaring rather than venting during completion activities, but only in cases where product capture is not feasible; ? Using closed tanks rather than open tanks or pits; ? Installing vapor recovery units on storage tanks; ? Using vapor balancing during condensate and oil tanker truck loading; ? Using closed-loop drilling; ? Replacing pneumatic (natural gas) pumps with electric or solar pumps; ? Optimize glycol circulation rates on glycol dehydrators; ? Replacing wet seals with dry seals in centrifugal compressors; ? Replacing worn rod packing in reciprocating compressors; and ? Installing automated plunger lift systems in natural gas wells; and monitoring equipment leaks and repairing equipment leaks. DRMP at B-16. The BMPs also call for climate related BMPs including: ? Reduce CO₂ emissions by reducing vehicle miles traveled and using fuel-efficient vehicles; ? Reduce CO₂ emissions by using renewable energy to power equipment; ? Reduce CO₂ emissions by using energy-saving techniques; ? Identify and implement methods to sequester CO₂; and ? Reduce methane emissions from oil and gas activities by: o Capturing methane using green</p>	Y	Thank you for your comment. Please see Appendices B and C.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		<p>completion, when feasible, and beneficially using the gas by placing it in sales pipeline; o Flaring methane during well completion activities for which green completion is infeasible; o Replacing natural gas driven pneumatic equipment with solar or electrically powered equipment; o Optimizing glycol recirculation rates for glycol dehydrators; o Operating flash tank separators on glycol dehydrators; Identifying fugitive emissions from equipment leaks and repairing or replacing seals, valves, compressor rod packing systems, and pneumatic devices; and Implementing additional GHG emission reduction strategies from the oil and gas BMPs located at: http://www.blm.gov/style/medialib/blm/wo/MINERALS__REALTY__AND_RESOURCE_PROTECTION_/bmps.Par.60203.File.dat/WO1_Air%20Resource_BMP_Slideshow%2005-09-2011.pdf126 and the EPA Natural Gas Star website at http://www.epa.gov/gasstar/tools/recommended.html. 126 See Bureau of Land Management, Air Resource BMPs: Best Management Practices for Fluid Minerals (2011), available at:http://www.blm.gov/pgdata/etc/medialib/blm/wo/MINERALS__REALTY__AND_RESOURCEPROTECTION_/bmps.Par.60203.File.dat/WO1_Air%20Resource_BMP_Slideshow%2005-09-2011.pdf (attached as Exhibit 113).DRMP at B-19. The last climate-related BMP identified in the DRMP include those that BLM itself has recognized and publicized on its website.127 These measures include: 127 See Exhibit 113. Moving toward cleaner diesel engines Natural gas powered engines ? Flaring Reduces Methane GHG emissions, but has downsides as noted below. Combustion emissions include NOx, CO, VOCs, and PM2.5, which can pose visibility and health problems, and CO2 (a less potent GHG). NOx and VOCs contribute to ozone formation. Wastes valuable natural gas resources. Reduced Emissions Completions Using chemical pumps and well monitoring telemetry powered by solar panels Using electricity from the nation's power grid is typically cleaner than using onsite diesel or natural gas engines to power drill rigs, compressors, and pumping units. Using enclosed tanks instead of open pits to reduce fugitive VOC emissions Vapor Recovery Units ?Using and maintaining proper hatches, seals, and valves to minimize VOC emissions Optimize Glycol Circulation and Install Flash Tank Separator Replacement of Wet Seals with Dry Seals in Centrifugal Compressors Reduce Emissions from Compressor Rod Packing Systems Replace high-bleed devices with low-bleed and Retrofit bleed reduction kits on high-bleed devices Installing Plunger Lift Systems and Automated Systems in Gas Wells ? Directed Inspection & Maintenance and Infrared Leak Detection</p>		
DR-MTDK-BL-13-0158-51	Air	BLM has also noted many methane pollution mitigation measures in its Climate Change, Supplementary Information Report ("SIR").128 BLM notes "US EPA's Natural Gas STAR program has identified more than 80 potentially cost-effective technologies for decreasing methane emissions from the oil and natural gas	Y	The BLM reviewed GHG emissions, based on new data from the USEPA's Greenhouse Gas Mandatory Reporting Rule (MRR). No operators of oil and gas production facilities reported GHG emissions under the EPA's GHG Mandatory Reporting Rule (MRR), as summarized in Section 3.2.2.4.4. The

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		<p>industry."129 Of these, the following discussion selects technologies that focus primarily on natural gas production and gathering equipment and on emission sources for which BLM may have a major role in identifying mitigation measures." SIR at 6-4. The report highlights the following mitigation technologies: 128 URS, Climate Change, Supplementary Information Report (Oct. 2010) (mitigation measure costs and paybacks are summarized in Table 6-2 at 6-6, 6-7 and described in Chapter 6), available at: http://www.blm.gov/mt/st/en/prog/energy/oil_and_gas/leasing/leasingEAs.html. 129 U.S. EPA, Natural Gas STAR Program, Recommended Technologies and Practices, available at: http://epa.gov/gasstar/tools/recommended.html. Natural Gas Mitigation Measures Wells: Reduced Emission (Green) Completions Plunger Lift Systems Smart Automation for Plunger Lift Systems ? Well Foaming Agents Tanks: Installation of Vapor Recovery Units Tank Consolidation Glycol Dehydrators: ?Flash Tank Separators Optimization of Glycol Recirculation Zero-emission Dehydrators Pneumatic Devices and Control systems: Replacement of High-Bleed Devices with Low-Bleed Devices Convert Gas Pneumatic Controls to Another Motive Force Valves: Test and Repair of Pressure Safety Valves Inspection and Repair of Compression Station Blowdown Valves Compressors: ? Electrification of Compressors Replacement of Wet Seals with Dry Seals Replacement of Compressor Rod Packing Systems The report also addresses key mitigation technologies for oil production and Coal Bed Methane. Oil Sector Mitigation Measures Methane Flaring Methane Reinjection: " " in many oil production fields natural gas cannot be captured and sold due to a lack of gas processing facilities and the absence of a nearby natural gas pipeline. When the gas cannot be sold, it can be vented, used as onsite fuel, flared, or reinjected into the oil field. " methane reinjection is estimated to be " more expensive than flaring. However, methane reinjection has several potential benefits over flaring, including (1) increasing oil well production, (2) avoiding combustion emissions, and (3) preserving natural gas in the well field for potential recovery at a later time," at 6-14, 15. CO2 Injection ? VRU Installation on Oil Storage Tanks Coal Bed Methane Well Mitigation Measures ? CBM Wells to Remove Methane ?CBM Wells to Sequester CO2</p>		<p>BLM also identified MDEQ regulations that would reduce methane from a variety of sources in Section 1.5.2 of Appendix T. Finally, Section B.1 of Appendix B, "Air Resource BMPs" provides a list of BMPs that would reduce GHG emissions.</p>
DR-MTDK-BL-13-0158-52	Air	<p>Gas Production and Processing Perform reduced emissions completions: Install plunger lifts Aerial leak detection using laser and/or infrared technology Eliminate unnecessary equipment and/or systems Oil Production Install VRUs on crude oil storage tanks Route casinghead gas to VRU or compressor for recovery & use or sale Gas Storage Convert gas pneumatic controls to instrument air Replace bi-directional orifice metering with ultrasonic meters Reduce methane emissions from compressor rod packing systems Gas Transmission DI&M at compressor stations Use fixed/portable compressors for pipeline pumpdown Install vapor recovery units on pipeline liquid/condensate</p>	Y	<p>The BLM reviewed GHG emissions, based on new data from the USEPA's Greenhouse Gas Mandatory Reporting Rule (MRR). No operators of oil and gas production facilities reported GHG emissions under the EPA's GHG Mandatory Reporting Rule (MRR), as summarized in Section 3.2.2.4.4. The BLM also identified MDEQ regulations that would reduce methane from a variety of sources in Section 1.5.2 of Appendix T. Finally, Section B.1 of Appendix B, "Air Resource BMPs" provides a list of BMPs that would reduce GHG emissions.</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		tanks The EPA Natural Gas STAR measures are recognized as effective, and as noted, were developed with industry. There is no reason why BLM should not work to include these measures in the BiFO RMP process.		
DR-MTDK-BL-13-0158-53	Air	<p>Another source of mitigation measures is the Leaking Profits report, published by NRDC.131 The stipulations outlined in that report would establish a mandatory obligation on lessees to adopt widely-recognized industry "best management practices," take all reasonable, cost-effective action to reduce GHG pollution and require the lessees to demonstrate, in applications for permit to drill, how GHG pollution will in fact be reduced from production-stage technologies and practices. It would also provide that BLM retains the authority to require best available technology for GHG reductions upon review of the lessee's APD. Best available methane emissions reduction technology would include at least the following, which are technically proven, commercially available and in most cases profitable: 131 See Exhibit 44. Green or reduced-emissions completions-</p> <p>"all recovered liquids must be routed to storage vessels and all recovered gases must be routed to a gas gathering line and collection system. This process captures liquids and gases coming out of wells as they are being drilled, repaired, stimulated or re-stimulated during hydraulic fracturing and keeps them out of the atmosphere. If capturing methane is not feasible due to the absence of gathering infrastructure, options include (1) imposing royalty and tax payments on flared gas to create economic incentives for infrastructure incentives, or (2) requiring gas re-injection. Liquids unloading-"operators must employ a plunger lift system or other liquids unloading system with an equal or greater methane capture rate at wellhead facilities to remove accumulated liquids from the well bore, separate them from the gas, route gas to a sales line, and route liquids to a storage vessel. Improved maintenance for compressors, dry seals-"operators must implement a maintenance program for compressors that is in line with industry best practices and must also employ tandem dry seals for all centrifugal compressors used in the production and transmission of natural gas. Pneumatic devices-"for all pneumatic devices, operators must employ low bleed or nobleed controllers. High-bleed pneumatic devices should be prohibited for all new applications and replaced on existing ones. TEG dehydrator emission controls-"methane venting from tri-ethylene (TEG) dehydrators must be minimized by retrofitting TEG dehydrating systems with emission control equipment including flash tank separators, optimizing the glycol circulation rate, rerouting the skimmer gas, and installing electric pumps to replace natural gas driven energy exchange pumps. Desiccant dehydrators-"operators must deploy desiccant dehydrators, which pass gas through a bed of water-absorbing salt to remove gas moisture without venting methane, whenever feasible. Vapor recovery units-"operators shall employ vapor recovery units comprising scrubbers, compressors and valves with all storage tanks that recover, at minimum, 99 percent of all</p>	Y	<p>The BLM reviewed GHG emissions, based on new data from the USEPA's Greenhouse Gas Mandatory Reporting Rule (MRR). No operators of oil and gas production facilities reported GHG emissions under the EPA's GHG Mandatory Reporting Rule (MRR), as summarized in Section 3.2.2.4.4. The BLM also identified MDEQ regulations that would reduce methane from a variety of sources in Section 1.5.2 of Appendix T. Finally, Section B.1 of Appendix B, "Air Resource BMPs" provides a list of BMPs that would reduce GHG emissions.</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		vapors. Recovered vapors shall not be leaked or vented into the ambient air. ? Pipelines-"all pipelines must be constructed using plastic pipe. If operators are able to demonstrate to the satisfaction of BLM that the use of plastic pipe is infeasible, operators shall employ plastic insert liners to reduce gas leakage. Excess flow valves shall be installed in all pipelines. When a pipeline is repaired or replaced, or cut to install a new connection point, the amount of methane released into the atmosphere must be reduced by either re-routed the gas and burning it as fuel during the repair and maintenance. Methane gas venting must also be mitigated by using hot tap connections, de-pressuring the pipeline to a nearby low pressure fuel system, or using a pipeline pump-down technique to route gas to sales. ? Leak Monitoring and Repair - Methane leaks can occur from numerous locations at an oil and gas facility -" valves, drains, pumps, connections, pressure relief devices, open ended valves, and lines. Since methane is a colorless, odorless gas, methane leaks often go unnoticed. Operators must establish a well-implemented program of regularly monitoring and repairing leaks to significantly reduce fugitive emissions.		
DR-MTDK-BL-13-0158-54	Air	Finally, the Clearing the Air report, by the World Resources Institute, outlines measures by which methane waste can be reduced.132 132 James Bradbury, Michael Obeiter, Laura Draucker, Wen Wang, and Amanda Stevens, Clearing the Air: Reducing Upstream Greenhouse Gas Emissions from U.S. Natural Gas Systems, Working Paper, World Resources Institute (April 2013), available at: http://www.wri.org/publication/clearing-the-air (attached as Exhibit 109).? Reducing emissions from well blowdowns with plunger lift systems ? Replacing existing high-bleed pneumatic controllers with low-bleed devices Leak detection and repair ("LDAR")	y	The BLM reviewed GHG emissions, based on new data from the USEPA's Greenhouse Gas Mandatory Reporting Rule (MRR). No operators of oil and gas production facilities reported GHG emissions under the EPA's GHG Mandatory Reporting Rule (MRR), as summarized in Section 3.2.2.4.4. The BLM also identified MDEQ regulations that would reduce methane from a variety of sources in Section 1.5.2 of Appendix T. Finally, Section B.1 of Appendix B, "Air Resource BMPs" provides a list of BMPs that would reduce GHG emissions.
DR-MTDK-BL-13-0158-55	Air	Otherwise, the BiFO DRMP does not sufficiently analyze air resources and climate actions. The DRMP does not include any stipulations that would reduce GHG emissions. Instead, the DRMP gives the BiFO complete discretion to implement BMPs on a case-by-case basis, depending on "the specific characteristics of project area and types of disturbance being proposed." DRMP at 2-8. As discussed, these actions do not go nearly far enough. Through the RMP, the BiFO should:	y	The BLM reviewed GHG emissions, based on new data from the USEPA's Greenhouse Gas Mandatory Reporting Rule (MRR). No operators of oil and gas production facilities reported GHG emissions under the EPA's GHG Mandatory Reporting Rule (MRR), as summarized in Section 3.2.2.4.4. The BLM also identified MDEQ regulations that would reduce methane from a variety of sources in Section 1.5.2 of Appendix T. Finally, Section B.1 of Appendix B, "Air Resource BMPs" provides a list of BMPs that would reduce GHG emissions.
DR-MTDK-BL-13-0158-6	Air	Despite these noted impacts, the BiFO's preferred alternative would authorize oil and gas and coal development in a manner that suggests it has no power whatsoever to influence events. BLM not only has the authority, but an obligation to address GHG emissions and methane waste. Related and cumulative actions must be considered in the EIS. The impact from regional BLM proposed oil and gas drilling will be substantial. This summer BLM released three separate DRMPs that will result in GHG emissions increases: the BiFO, the Miles City, and the Hilline DRMPs. Under the preferred alternatives, the three DRMPs would	N	Thank you for your comment

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		cover over 9.8 million acres of open federal lease estate in Montana-"roughly 10% of the state-"and result in 95 new federal wells per year.12Â 12 The three RMPs were developed by the Miles City, Billings, and Havre Field Offices. Under the proposed Miles City Field Office RMP, all 5.4 million acres of federal lease estate would be open to oil and gas drilling and the Miles City Field Office anticipates 43 new wells per year. BLM, Draft . The draft Hiline Field Office RMP proposed development on 4,042,298 acres, and under the BLM's preferred alternative, estimated 98 new oil and gas wells per year. The draft Billings Field Office and Pompeys Pillar National Monument RMP proposed 606,096 acres of federal lease estate and estimated 4 new wells per year. Draft RMPs and Environmental Impact Statements may be found here: http://www.blm.gov/mt/st/en.html .		
DR-MTDK-BL-13-0158-7	Air	In addition, when considering regional impacts, the BiFO must examine and disclose whether any proposed disposals under its Alternatives have been subject to a lease sale in the past, will result in coal, oil or gas development, and also disclose any anticipated GHG emissions on those lands. For example, under Alternatives C and D, at least two proposed lease sales (T. 4 S., R. 19E., sec. 35 SENE and T. 5 S., R 19 E., sec.5, SESE) were leased in 2004. DRMP at J-16, 17. BiFO must disclose this information -" information that it already has in its possession -" and analyze potential impacts.	N	Thank you for your comment. The RMP/EIS looks at future impacts from land use planning decisions and assesses direct and cumulative impacts.
DR-MTDK-BL-13-0158-8	Air	Moreover, with GHG pollution and climate change, it is not only the contribution to climate change that must be considered, but, also, the combined impact of the authorized activity and climate change to specific resources; e.g., water resources, vegetation, farmlands, wildlife and endangered species, etc. Here, the BiFO fails to take this next step. While the BiFO DRMP provides data on GHG emissions from the preferred alternative, and lists general impacts from climate change, the agency fails to account for this data in its decision-making or provide any hard look analysis of the associated impacts, in violation of NEPA.	N	The BLM does not have sufficient data to assess specific planning area climate change impacts associated with authorized activities that would release GHGs.
DR-MTDK-BL-13-0158-9	Air	As noted above, the BiFO has recognized the impacts of authorized activities on GHG pollution and climate change. Accordingly, the agency must take the next step and address BiFO related emission contributions in the DRMP. It is not enough to simply identify impacts that may occur. BLM is required to take a hard look at those impacts as they relate to the agency action. The BiFO DRMP fails to provide this hard look analysis. "Energy-related activities contribute 70% of global GHG emissions; oil and gas together represent 60% of those energy-related emissions through their extraction, processing and subsequent combustion."13 Even if science cannot isolate each additional gas well's contribution to these overall emissions, this does not obviate BLM's responsibility to consider oil and gas development in the BiFO from the cumulative impacts of the oil and gas sector. In other words, the BLM cannot ignore the larger relationship that oil and gas management decisions have to the	Y	SO 3226, NEPA, and FLPMA require the BLM to assess GHG emissions and impacts. GHG emissions from oil and gas sources within the planning area are very low and are expected to remain low with maximum development of four wells per year. No oil and gas production companies had sufficient GHG emissions to require reporting under the EPA Greenhouse Gas Mandatory Reporting Rule (40 CFR Part 98, Subpart W) for year 2012, as summarized in Section 3.2.2.4.4. Section B.1 of Appendix B summarizes BLM BMPs to reduce GHG emissions.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		broader climate crisis that we face. If we are to stem climate disaster -“ the impacts of which we are already experiencing, as discussed above -“ the agency's resource management decisions, as will be provided in the BiFO DRMP, must be reflective of this reality and plan accordingly. 13 International Investors Group on Climate Change, Global Climate Disclosure Framework for Oil and Gas Companies (attached as Exhibit 36).The current DRMP fails to do so.		
DR-MTDK-BL-13-0171-1	Livestock Grazing	The BLM assumed that removing livestock from the landscape would be necessary on allotments "wholly located within Sage grouse Habitat." DRMP/DEIS at 2-116. However, based on research removing livestock is not necessary for sage grouse. Exhibit A -" M. M. Rowland, Effects of Management Practices on Grassland Birds: Greater Sage Grouse, Northern Prairie Wildlife Research Center Online (2004)	n	BLM did not assume that removing livestock from the landscape would be necessary. It may however be desirable for sage grouse on an allotment basis to retire specific allotments from grazing. Additionally, and further proof that BLM did not assume removal of livestock on a landscape basis is necessary for sage grouse, on page 2-116 under impacts common to all alternatives it is stated BLM would " use livestock grazing to enhance ecosystem health, wildlife habitat, Where supported by site-specific environmental analysis." If current livestock use is compatible with sage grouse habitat requirements, BLM would have little basis to retire the allotment from grazing. In addition, base property owners rarely relinquish their preference.
DR-MTDK-BL-13-0171-10	Livestock Grazing	In this case, the BLM failed to "insure the professional integrity, including the scientific integrity, of the discussions and analysis in the [DEIS]," in violation of NEPA and the DQA. Some examples of the BLM's failure to meet data quality standards include: At 3-40 of the DRMP/DEIS the BLM states that there are 427,619 surface acres in the planning area, but at 3-134 of the DRMP/DEIS, the BLM states that it has 433,688 acres available in its VRM qualifications. There seems to be an error. The information on 4-37 of the DRMP/DEIS, related to temperature, was cherry picked to leave out years in the 1930s that were very hot and would throw the desired curve off. Throughout the DRMP/DEIS (at 2-14; 4-37, 42, etc.), the whole plan seems to be to get rid of livestock grazing, which will only increase the dead vegetation that will lead to hot fires. Hot fires kill big sagebrush. The BLM states that big sagebrush is sage grouse habitat. Therefore, it seems that the data and science do not add up. On 4-473 of DRMP/DEIS, the BLM is requiring a two-year rest after a fire. However, this requirement is totally false according to USDA research. Exhibit B -" Lance Vermeire, Challenging Taboos in Fire and Grazing Management, Soil and Water Conservation Society (2006).	Y	Thank you for your comment. Please see Chapter 3 Vegetation-Rangeland. The acre discrepancies will be corrected.
DR-MTDK-BL-13-0171-11	Livestock Grazing	The reality is that the initial reduction in grazing is much larger than the reduction in livestock numbers that the BLM used to underpin its analysis. The DRMP provides for: Loss of 47,097 acres and up to 7,746 AUMs; The closing of allotments for sage-grouse; The closing of allotments for not meeting water quality standards; The reduction livestock grazing acres for Areas of Critical Environmental Concern; The reduction of livestock grazing acres for Wild and Scenic River Designation areas; The reduction of livestock grazing acres for	n	The reduction of grazing varies little throughout the alternatives. Table 2-6.2 in the DRMP shows that: 1) 434,154 acres would be available to livestock grazing under all alternatives. Total acres permitted for livestock grazing ranges between 386,092 acres and 387,057, similar to the current level of 387,057 acres. The 47,097 acres of assumed loss described in the comment, likely includes the 9,522 acres of isolated parcels not included in allotments, the 28,387 acres of Pryor Mountain Herd Area, and the 9,021 acres available for

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		<p>Wilderness Study areas. These reductions were not properly analyzed under NEPA, as to required indirect and direct effects of this action. Furthermore, when the BLM analyzed the economic and social impacts of the DRMP/DEIS it did not use the actual, correct number in the plan for livestock grazing reductions. The BLM has violated NEPA, the TGA, FLMPA and the DQA due to its unlawful, arbitrary and capricious actions related to grazing.</p>		<p>prescriptive use. Currently these acres are closed to permitted livestock grazing; therefore there would be no loss of these acres. Additionally, under alternative C and D, 9,021 acres that are currently not permitted to livestock grazing could be opened to prescriptive grazing. 2) The 7,746 AUMs of assumed loss are the currently suspended AUMs. Under alternative B these AUMs would be maintained as suspended, Under alternative C these AUMs would be available for livestock grazing, and under alternative D BLM could adjust these AUMs, which includes the ability to make these AUMs available for livestock grazing based upon resource condition. 3) Under Alternative B, C, and D the BLM would consider the retirement of allotments wholly located within sage grouse PHMAs only if the base property owner relinquishes their preference. Based on historical grazing administration in the Billings Field Office, grazing preference is rarely relinquished. If current livestock use is compatible with sage grouse habitat requirements, BLM would have little basis to retire the allotment from grazing. 4) BLM is required under the federal grazing regulations 43 CFR 4180.2 to manage public lands to attain standards for rangeland health. Water quality is a standard of rangeland health (Standard #3 , Appendix I), however if livestock grazing is not determined to be a causal factor for this (or any) standard to be achieved, changes to livestock grazing management are not required. If livestock grazing is a causal factor, changes to management would be required; however closing an allotment would only be considered as a last resort option. 5) On table 2-6.2 9,021 acres of ACEC currently closed to permitted livestock grazing would be available to prescriptive grazing treatment. None of the other ACECs throughout the field office would be closed to livestock grazing in any alternative. 6) Table 2-6.2 does not show any reduction to livestock grazing from wilderness study areas or wild and scenic river designations, under any alternative. Additionally, on Table 2-6.3 (Pg. 2-169 through 2-170) reduced or no grazing is not discussed in either the WSA or WSR sections. Therefore there is little reduction to grazing acres, or amounts. In fact the BLM has allowed discretion to authorize grazing over more acreage, than current management, with potentially more AUMs grazed.</p>
DR-MTDK-BL-13-0171-12	Livestock Grazing	<p>In 1934, Congress enacted the Taylor Grazing Act ("TGA"), "to provide for the orderly use, improvement, and development of the range." 43 U.S.C. § 315(a). "One of the key issues the TGA was intended to address was the need to stabilize the livestock industry by preserving ranchers' access to the federal lands in a manner that would guard the land against destruction." Public Lands Council v. Babbitt, 167 F.3d 1287 (10th Cir. 1999). Additionally, the TGA requires that the BLM adequately protect grazing privileges. 43 U.S.C. §§ 315a, 315b. Even though at first glance, the BLM indicates that grazing will continue at near current levels, a more detailed analysis indicates many instances where the BLM may negatively impact grazing under this DRMP. These instances include</p>	N	<p>Thank you for your comment.</p> <p>Please see chapter 3 table 3-16.</p> <p>The BLM's multiple-use mission and the BLM's obligation to comply with the Federal Land Policy and Management Act of 1976 (FLPMA) and all other applicable laws, regulations and policies are addressed in Chapter 1 of the RMP/EIS.</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		<p>statements such as: "Allotments wholly located within sage grouse Habitat -" Priority Area habitat would be considered for retirement where the base property owner relinquished their preference." DRMP/DEIS at 2-116. "Areas with active surface disturbance (such as energy and mineral development, range improvements, wildfire, and prescribed fire) would be unavailable to livestock grazing." DRMP/DEIS at 4-157. "If standards are not being met, and grazing is a causal factor, management actions would be taken to make progress toward meeting the standard before the next grazing season." DRMP/DEIS at 2-119. Exhibit C -" Standards for Rangeland Health and Guidelines. Throughout the DRMP/DEIS the BLM has committed itself to meeting PFC water quality standards and to manage for aquatic habitat. "Areas with active surface disturbance would be unavailable to livestock grazing. The AUMs for these areas would be suspended during surface disturbance activities until at such time grazing would continue in a manner which supports the standards for rangeland health. DRMP/DEIS at 2-120. Based on the DRMP/DEIS, livestock grazing is not the reason for most issues related to water quality and watershed health. Therefore, closing allotments is not a solution and this language indicates that the BLM is just attempting to get rid of livestock grazing. The mandatory compliance with the Standards for Rangeland Health violates the very principal of the Standards, which provides that livestock grazing would not be changed unless grazing caused the non-compliance. Further, the Standards are meant to establish a process of analysis to progress towards meeting the Standards. The Standards are not meant to be a punitive way to get rid of livestock grazing. At L-1, the BLM sets up permit standards that in the future will cause every BLM grazing permit change to go through a NEPA analysis. This contradicts national laws and policy. These statements that could negatively impact grazing are in direct violation of the BLM's duty to adequately safeguard grazing under the TGA and FLMPA.</p>		
DR-MTDK-BL-13-0171-13	Livestock Grazing	<p>The Standards for Rangeland Health and Guidelines "provide the technical and scientific basis for measuring progress towards healthy and productive rangelands." Standards for Rangeland Health and Guidelines, Preamble. However, the DRMP requires the closing of allotments instead of making progress towards meeting the functions and conditions included within the Standards. Therefore, the DRMP is more restrictive than the Standards the DRMP is supposed to meet. This is arbitrary, capricious and unlawful.</p>	N	<p>Thank you for your comment. Please see Chapter 2 Livestock Grazing. The B&PPNM RMP/EIS does not have an alternative that includes closing of grazing allotments not meeting/making progress towards land health standards.</p>
DR-MTDK-BL-13-0171-15	NEPA, Livestock grazing	<p>Furthermore, the DRMP's Guidelines overreach their proposed authority and impose a more stringent grazing management policy than required by the Federal environmental laws set forth in the Endangered Species Act. In fact, the only instance in which the Federal Government has used restrictive language as restrictive as the DRMP's ("should maintain or improve habitat for federally listed threatened, endangered, and special status plants and animals") is in a</p>	N	<p>Thank you for your comment. Comment outside the scope of the document.</p>

*Billings and Pompeys Pillar National Monument
Proposed Resource Management Plan and Final Environmental Impact Statement*

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		handbook put out by the U.S. Fish and Wildlife Service, outlining consultation procedures under the Endangered Species Act. Even here, the standard suggested by the DRMP is referenced by the Government only in its Safe Harbor Agreements, and these are agreements in which Montana does not participate.		
DR-MTDK-BL-13-0171-16	NEPA	As mentioned earlier, NEPA requires that the BLM use best available science and quality data to make its decisions. <i>City of Sausalito v. O'Neill</i> , 386 F.3d 1186, 1213 (9th Cir. 2004). Also, in addition to NEPA requiring the BLM to use best available science and quality data and to determine the impacts on the local culture and economy, the BLM is required to balance these impacts after it has done the initial analysis. Nowhere in the DRMP does the BLM attempt to explain how it is going to balance or coordinate these environmental impacts caused by the BLM's plan.	N	Thank you for your comment. Please see Chapter 4 for environmental consequences and impact analysis of the Proposed RMP.
DR-MTDK-BL-13-0171-17	Travel mngt	The BLM is not supposed to increase or decrease the ability of Montana to manage fish and wildlife. However, in contrast to that stated goal, under the DRMP the BLM is planning to limit hunter and game warden ability for vehicular travel that allow hunters to reach big game hunting and fishing areas. If hunters cannot reach the game, they will not be able to harvest it, which means that Montana will be less able to manage the numbers of big game. The BLM has not considered how its transportation plan will negatively impact hunting. Access to game hunting areas is key to game harvest and retrieval in the rugged terrain of the areas included within the DRMP. In fact, promotion of public access to hunting is a top priority for the State's game management officials and continues to be a huge public interest issue in Montana.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS. In specific response to the statement that BLM has not considered access for hunting purposes, please refer to Appendix O and numerous sections throughout the RMP which analyze the effects of vehicle routes being open or closed and also the inventory sheets for individual routes.
DR-MTDK-BL-13-0171-18	Wildlife	Sage grouse within the area should be managed following the plan written by the State of Montana. Currently, since the sage grouse is not listed under the Endangered Species Act, the State of Montana has developed a sage grouse plan. The BLM's actions as listed in the DRMP do not follow the State's plan. While the Montana plan does suggest avoiding the placement of salt near leks during breeding season and avoiding supplemental winter feeding on crucial winter habitat, it does not go so far as to suggest conservative stocking levels to avoid concentrations of livestock. The DRMP should follow the 2005 Management Plan and Conservation Strategies for Sage Grouse in Montana which recognizes that "properly managed grazing can stimulate growth of grasses and forbs, and thus livestock can be used to manipulate the plant community toward a desired condition." See 2005 Management Plan and Conservation Strategies for Sage Grouse in Montana at 55 (available at Doc.ht1?kl= n8 m) (last accessed June 4, 2013).	n	Thank you for your comment.
DR-MTDK-BL-13-0171-	wildlife	The BLM based the DRMP on its 2011 National Technical Team Report ("NTT Report"), which is not based on best available science in violation of the ESA. Exhibit D -" Megan Maxwell, BLM's NTT Report: Best Available Science or a	n	The NTT report is not the sole source of management decisions for the range of alternatives. A National Technical Team (NTT) was formed as an independent, science-based team to ensure that the best information about how to manage

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
19		<p>Tool to Support a Pre-Determined Outcome? Northwest Mining Association (2013). The BLM's dependence on the NTT also violated the DQA and is arbitrary, capricious and unlawful. Further, it seems that the BLM is using the DRMP to justify the BLM's determination related to sage grouse that were made prior to the DRMP/DEIS analysis, which is a violation of NEPA</p>		<p>the greater sage-grouse is reviewed, evaluated, and provided to the BLM and the Forest Service in the planning process. The group produced a report in December 2011 that identified science-based management considerations to promote sustainable greater sage-grouse populations. The NTT is staying involved as the BLM and the Forest Service work through the Strategy to make sure that relevant science is considered, reasonably interpreted, and accurately presented; and that uncertainties and risks are acknowledged and documented. A baseline environmental report, titled Summary of Science, Activities, Programs, and Policies That Influence the Rangeland Conservation of Greater Sage-grouse (<i>Centrocercus urophasianus</i>) (referred to as the BER), was released on June 3, 2013, by the U.S. Geological Survey. The peer-reviewed report summarizes the current scientific understanding about the various impacts to greater sage-grouse populations and habitats and addresses the location, magnitude, and extent of each threat. The BER does not provide management options. The report is being used by the BLM and the Forest Service in our efforts to develop regulatory mechanisms and improve our conservation efforts of the greater sage-grouse and its habitat to reduce the potential for listing it under the Endangered Species Act. The data for this report were gathered from BLM, Forest Service, and other sources and were the "best available" at the range-wide scale at the time collected. The report provides a framework for considering potential implications and management options, and demonstrates a regional context and perspective needed for local planning and decision-making.</p> <p>In March 2012, the FWS initiated a collaborative approach to develop range-wide conservation objectives for the greater sage-grouse to inform the 2015 decision about the need to list the species and to inform the collective conservation efforts of the many partners working to conserve the species. In March 2013, this team of State and FWS representatives, released the Conservation Objectives Team (COT) report based upon the best scientific and commercial data available at the time that identifies key areas for greater sage-grouse conservation, key threats in those areas, and the extent to which they need to be reduced for the species to be conserved. The report serves as guidance to Federal land management agencies, State greater sage-grouse teams, and others in focusing efforts to achieve effective conservation for this species.</p> <p>The range of alternatives is based upon analysis of public scoping comments as well as information provided in the NTT report, the BER, the COT report, and State management plans. The alternatives represent different degrees of and approaches to balancing resources and resource use among competing human interests, land uses, and the conservation of natural and cultural resource values, while sustaining and enhancing ecological integrity across the</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
				<p>landscape, including plant, wildlife, and fish habitat. Greater sage-grouse conservation measures in A Report on National Greater Sage-grouse Conservation Measures (NTT 2011) were used to form BLM and the Forest Service management direction under at least one alternative (Alternative B and portions of Alternative D), which is consistent with the direction provided in BLM Washington Office Instruction Memorandum 2012-044 (the BLM must consider all applicable conservation measures developed by the NTT in at least one alternative in the land use planning process). Additionally, all alternatives considered within this planning process are consistent with conservation measures and objectives outlined in the COT Report and follow the basic principles of: (1) avoiding the impact of an activity; (2) minimizing impacts by limiting the degree of activity; and (3) mitigating for an impact by improving or enhancing greater sage-grouse habitat. Each of the alternatives considers different means for accomplishing this strategy. For example, some alternatives place greater emphasis on avoidance of impacts, whereas other alternatives place more emphasis on minimization and mitigation.</p> <p>While there was consistent direction provided in alternative develop, such as BLM WO IM 2012-044, variation across sub-regionals was needed to accommodate the local issues and specific state and Forest Service requirements.</p>
DR-MTDK-BL-13-0171-2	Vegetation Invasive Species and Noxious Weeds	The BLM assumed that creating 3 mile buffers would benefit the resources. DRMP/DEIS at 2-79. However, the problem with a buffer zone is that those areas increase invasive species and weeds. This action could actually create a negative ecological impact.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS.
DR-MTDK-BL-13-0171-20	Wildlife	Furthermore, as stated earlier in these comments, the BLM failed to conduct the necessary economic analysis to determine the impacts of sage grouse management on the local customs and culture, which is required by NEPA. Also, the BLM has not provided an adequate basis for its plans surrounding sage grouse leks so that the public could provide adequate comments. Again, there is a total lack of scientific basis and data as required by NEPA and the DQA. Also, much of the scientific data cited is very old and possibly irrelevant.	n	<p>The requisite level of information necessary to make a reasoned choice among the alternatives in an EIS is based on the scope and nature of the proposed decisions. As the EIS analyzes land use planning-level decisions, which by their nature are broad in scope, the requisite level of data and information is more generalized in order to apply to a wide-ranging landscape perspective. Although the BLM realizes that more data, and more site specific data, could always be gathered, the baseline data utilized in the EIS provide the necessary basis to make informed land use plan-level decisions.</p> <p>The BLM considered the availability of data from all sources, adequacy of existing data, data gaps, and the type of data necessary to support informed management decisions at the land-use plan level. The data needed to support broad-scale analysis of the BLM Billings planning area are substantially different than the data needed to support site-specific analysis of projects. The</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
				<p>RMP/EIS data and information is presented in map and table form and is sufficient to support the broad scale analyses required for land use planning.</p> <p>Additionally, the BLM used the most recent and best information available that was relevant to a land-use planning-level analysis including the Baseline Environmental Report ([BER]; Manier et al. 2013). The BER assisted the BLM in summarizing the effect of their planning efforts at a range-wide scale, particularly in the affected environment and cumulative impacts sections. The BER looked at each of the threats to greater sage-grouse identified in the Fish and Wildlife Service’s “warranted but precluded” finding for the species. For these threats, the report summarized the current scientific understanding, as of the BER’s publication date (June 2013), of various impacts to greater sage-grouse populations and habitats. The report also quantitatively measured the location, magnitude, and extent of each threat. These data were used in the planning process to describe threats at other levels, such as the sub-regional boundary and WAFWA Management Zone scale, to facilitate comparison between sub-regions. The BER provided data and information to show how management under different alternatives may meet specific plans, goals, and objectives.</p> <p>The BLM consulted with, collected, and incorporated data from other agencies and sources, including but not limited to the U.S. Fish and Wildlife Service, and the Montana Fish, Wildlife and Parks. Additional information provided by state and local governments regarding socioeconomics also support the analysis in Chapter 4.</p> <p>As a result of these actions, the BLM gathered the necessary data essential to make a reasoned choice among the alternatives analyzed in detail in the Draft RMP/EIS, and provided an adequate analysis that led to disclosure of the potential environmental consequences of the alternatives (see Chapter 4, Environmental Consequences and Cumulative Effects). As a result, the BLM has taken a “hard look,” as required by the NEPA (see 40 CFR 1502.16), at the environmental consequences of the alternatives in the Draft RMP/EIS to enable the decision maker to make an informed decision.</p> <p>As noted in more detail in responses to issue statements identified elsewhere in the report, the BLM has complied with the myriad applicable laws, policies, and guidance in developing the RMP/EIS. Section 2.2, Developing the Range of Alternatives, of the RMP/EIS, states that all alternatives would comply with state and federal laws, regulations, policies, and standards, and implement actions originating from laws, regulations, and policies. Additionally, in Section</p>

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				<p>1.4.2, Planning Criteria, of the Draft RMP/EIS, the BLM has a criterion stating that all alternatives would comply with existing laws, regulations, and policies. The BLM has reviewed all actions in the Proposed RMP/Final EIS and found them to be consistent and within the bounds of all required laws, regulations, and policies. Further details regarding BLM compliance with state, county, and local plans and policies can be found in Section 1.5, Consistency with Other State, County, or Local Plans, of this report. A land use planning-level decision is broad in scope and, therefore, does not require an exhaustive gathering and monitoring of baseline data. Although the BLM and the Forest Service realize that more data could always be gathered, the baseline data provides the necessary basis to make informed land use plan-level decisions. Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions (BLM Land Use Planning Handbook H-1601-1, Chapter II, A-B at 11-13 and Chapter IV, B at 29; Forest Service Handbook 1909.12 – Land Management Planning). The BLM and the Forest Service will conduct subsequent project-specific NEPA analyses for projects proposed for implementation under the land use plan, which may include but are not limited to fuels treatment, habitat restoration, [etc.; list others as applicable]. The subsequent NEPA analyses for project-specific actions will tier to the land-use planning analysis and evaluate project impacts at the appropriate site-specific level (40 CFR 1502.20, 40 CFR 1508.28). As required by NEPA, the public will have the opportunity to participate in the NEPA process for site-specific actions.</p> <p>A summary of Economic impacts is included in Ch.2, pgs. 196-199 and Ch.4, pgs.4-588-594(Social) and pgs. 4-594 to 4-628(Economic). The impacts were summarized for all wildlife. Specific sage-grouse management economic impacts are beyond the scope of this RMP.</p>
DR-MTDK-BL-13-0171-21	NEPA	The requirements imposed on state and county governments and private property owners by the DRMP violate the Unfunded Mandates Reform Act ("UMRA"). 2 U.S.C. § 1501 et seq. A federal mandate is defined as "any provision in legislation, statute, or regulation that would impose an enforceable duty upon State, local, or tribal governments" or which "would impose an enforceable duty upon the private sector." 2 U.S.C. § 658(5)(A), (6), (7)(A). The DRMP is such a mandate. The DRMP would require ranchers to take additional actions to manage livestock grazing on lands covered by the DRMP, would impose a number of enforceable restrictions on natural gas operators, and would require additional services, such as county emergency services, to be provided by local governments. The UMRA requires that, "before promulgating any general notice of proposed rule-making that is likely to result in promulgation of any rule that includes any Federal mandate that may result in the expenditure by State, local, and tribal governments, in the aggregate, or by the private sector, of	N	Thank you for your comment.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		\$100,000,000 or more (adjusted annually for inflation in any 1 year)," the agency must prepare a written statement assessing the qualitative and quantitative costs and benefits on State and local governments and the private sector. 2 U.S.C. § 1532(a)(2). This assessment must include the extent to which Federal financial assistance is available to carry out the mandate. Id.		
DR-MTDK-BL-13-0171-22	Social/econ	For the reasons recited previously, the agency has failed to adequately outline the quantitative and qualitative economic impacts on the private sector. Similarly, the economic analysis is completely void of any quantitative or qualitative costs and benefits to the State and local governments from imposition of the DRMP. The economic analysis section does note that the costs of managing the area may change under the RMP; however, there is no assessment of any impact to State or local governments. Clearly, this fails to meet the requirements of the UMRA.	n	The URMA addresses unfunded mandates imposed on state, local, and tribal governments by the federal government. The decisions to be made under the RMP may affect revenue from federal activities, but it would not impose costs on state and local governments. The decisions to be made under the plan would apply only to federal lands. A change in revenue from federal activities is not equivalent to an unfunded mandate. Furthermore, the economic analysis addresses the economic consequences of federal payments to states and counties on pg. 4-605 of the DEIS.
DR-MTDK-BL-13-0171-23	Social/econ	The UMRA additionally requires that the agency estimate the future costs of complying with the federal mandate, as well as any disproportionate budgetary effects upon State or local governments or particular segments of the private sector. 2 U.S.C. § 1532(a)(3). Nowhere in the DRMP does the BLM provide such an estimate. As stated in the section on economic analysis, the costs of complying with the DRMP would significantly impact the local tax base (due to decreases in ranch values, decreased revenue from natural gas operations, and a decrease in the tax base due to BLM land acquisitions). This would, in turn, significantly impact local communities, and particularly school districts, whose budgets are already struggling to meet the requirements of the No Child Left Behind Act. Furthermore, the BLM failed to provide an analysis of the budgetary impact to local communities from having to provide increased emergency services on the DRMP lands. The Act further requires the agency to provide a description of the extent to which the agency has consulted with elected representatives of State, local, and tribal governments, a summary of the representatives' comments and concerns (submitted either orally or in writing), and the agency's evaluation of those comments and concerns. 2 U.S.C. § 1532(a)(5). Finally, the UMRA requires that the BLM "enable officials of affected small governments to provide meaningful and timely input in the development of regulatory proposals containing significant Federal intergovernmental mandates" and "inform, educate, and advise small governments on compliance with the requirements." 2 U.S.C. § 1533(a). While the county governments were included as cooperating agencies in the development of the DRMP, the BLM has completely ignored the concerns of these local governments, thereby preventing them from providing meaningful input into the process. For example, the BLM ignored a request for more time for the public to provide comments on the DRMP.	N	Thank you for your comment. See Chapter 3, Socioeconomics for the description of social, economic and environmental justice conditions and trends and the description of social, economic and environmental justice impacts in Chapter 4, under those sections, which describes changes in employment, income, in various private sectors and changes to social conditions. The Annual Average BLM Revenues and Payments to State and Counties table shows impacts to public revenues to state and counties. No public comment period extensions were granted.
DR-	Social	A. The BLM Failed to Comply With Intergovernmental Cooperation Act The	N	Thank you for your comment.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
MTDK-BL-13-0171-24	/econ	<p>Intergovernmental Cooperation Act ("ICA"), 31 U.S.C. §§ 6501-6506, and companion Executive Order 12372, require all federal agencies to consider local viewpoints during the planning stages of any federal project. 31 U.S.C. § 6506(c). The obligation of the BLM to consider local government concerns is a legally enforceable right. <i>City of Waltham v. United States Postal Service</i>, 11 F.3d 235, 245 (1st Cir. 1993). Injunctive relief is available in those cases where the federal agencies have failed to comply with the ICA. <i>City of Rochester v. United States Postal Serv.</i>, 541 F.2d 967, 976 (2nd Cir. 1976). The consideration of local government plans and policies must occur on the record. Federal agencies have an affirmative duty to develop a list of factors which support or explain an agency's decision to act in disharmony with local land use plans. <i>Village of Palatine v. United States Postal Serv.</i>, 742 F. Supp. 1377, 1397 (N.D. Ill. 1990). B. The BLM Failed to Comply With the Regulatory Flexibility Analysis Requirement The Regulatory Flexibility Analysis Act, 5 U.S.C. § 601 et seq., requires the BLM to perform an analysis on whether the approach outlined in the DRMP is the most flexible necessary to meet the goals. This analysis has not been done, which means the public, including my clients, have not had the opportunity to comment based on legally mandated analysis by the BLM. C. The BLM Failed to Provide a Small Business Regulatory Enforcement Fairness Act Analysis Pursuant to 5 U.S.C. § 804(2), the BLM was supposed to determine whether the DRMP would negatively impact small businesses in the area. This analysis was not done. D. The BLM Failed to Comply with the Executive Order Requiring Regulatory Planning and Review Executive Order 12866 requires the BLM to have the Office of Management review all significant rules and regulations. This analysis has not been done. E. The BLM Failed to Provide an Energy Effect Analysis Executive Order 13211 requires that the BLM analyze how this DRMP would impact energy needs in the United States. This analysis has not been done. F. The BLM Failed to Provide a Federalism Analysis Executive Order 13132 requires that the BLM provide a federalism analysis. This analysis has not been done. G. The BLM Failed to Provide a Civil Justice Reform Analysis Executive Order 12988 requires that the BLM analyze the impact of the DRMP on civil justice. This analysis has not been done. H. The BLM Failed to Provide an Environmental Justice Analysis The 8 rural counties in Montana impacted by the DRMP have some of the oldest and poorest people per capita in Montana. The economy of this area is dependent upon harvesting natural resources and the meager PILT payments that these counties receive. These communities are low-income and would suffer from disproportionate negative impacts due to the DRMP. Executive Order 12898 requires the BLM to analyze the impact of the DRMP on low-income citizens. As found in the DRMP, many of those in the area impacted by the DRMP are lower income citizens. The BLM has not done the necessary analysis on how the DRMP negatively impacts</p>		<p>See chapter 1 for list of compliance with various plans, laws, etc. See Appendix A for list of laws, acts, BLM manuals and handbooks this document is in compliance with.</p> <p>See Chapter 3, Socioeconomics for the description of social, economic and environmental justice conditions and trends and the description of social, economic and environmental justice impacts in Chapter 4, under those sections, which describes changes in employment, income, in various private sectors and changes to social conditions. The Annual Average BLM Revenues and Payments to State and Counties table shows impacts to public revenues to state and counties. No public comment period extensions were granted.</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		<p>those people, as required. I. The BLM Failed to Provide a Takings Analysis Executive Order 12630 requires that federal government actions which may result in a taking of private property must undergo a takings analysis prior to implementation. Executive Order 12630, 62 Fed. Reg. 48, 445 (Governmental Actions and Interference with Constitutionally Protected Property Rights (1988)) (stating that "governmental actions that may have significant impact on the use of value or private property should be scrutinized to avoid undue or unplanned burdens on the public.") The BLM has failed to complete a takings analysis. J. The BLM Has Violated the National Historic Preservation Act Pursuant to this Act, 16 §§ 470-470x-6, the BLM was supposed to consult with the local governments impacted to determine whether the DRMP would adversely affect historic property. This consultation has not occurred. K. The BLM Has Violated the Soil and Water Resources Conservation Act Pursuant to this Act, the BLM was supposed to coordinate with local governments. See 16 §§ 2003(b), 2008. As already explained, the BLM has failed to adequately coordinate with local governments. L. The BLM Has Violated the Resource Conservation Act of 1981 Pursuant to this Act, 16 U.S.C. § 3451 et seq., the BLM was supposed to coordinate with local governments. As already explained, the BLM has failed to adequately coordinate with local governments. M. The BLM Has Violated the Regulatory Planning and Review Requirement Executive Order 12866 states that, "[t]he American people deserve a regulatory system that works for them, not against them: a regulatory system that protects and improves the health, safety, environment, and well being and improves the performance of the economy without imposing unacceptable or unreasonable costs on society; regulatory policies that recognize that the private sector and private markets are the best engine for economic growth; regulatory approaches that respect the role of state, local and tribal governments; and regulations that are effective, consistent, sensible, and understandable." Pursuant to this Executive Order, the agencies were supposed to seek input from local governments, minimize the regulatory burdens, and harmonize federal regulatory actions with related state, local and tribal regulatory functions. Again, the BLM has not met the requirements in this Executive Order.</p>		
DR-MTDK-BL-13-0171-3	Livestock grazing	<p>Throughout the DRMP (DRMP/DEIS at 2-14; 4- 37, 42, etc.), the whole plan seems to be to get rid of livestock grazing, which will only increase the dead vegetation that will lead to hot fires. Hot fires kill big sagebrush. The BLM states that big sagebrush is sage grouse habitat. Therefore, it is the BLM who has failed to analyze the direct and indirect ecological effects of the DRMP.</p>	n	<p>Thank you for your comment. "Removal of livestock grazing from public lands has not be considered in detail in the DRMP/DEIS. In fact on pages 2-12 through 2-14 of the DRMP, it is stated that this alternative was not considered because it does not meet the purpose and need of the RMP/EIS. In addition in table 2-6.2 (pg 2-117 through 2-120 of the DMRP) the acres permitted to livestock grazing across all alternatives (A through D) vary by 965 acres across the entire field office. This represents less than 1% of the public surface acres managed by the BLM Billings Field Office. Due to the minimal difference in acres permitted to livestock grazing between alternatives, an analysis of the</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
				effects of removal of grazing, vegetative buildup, fire frequency, fire intensity, and sage brush mortality was not analyzed"
DR-MTDK-BL-13-0171-4	Livestock grazing, social/econ	Examples of the BLM's failure to analyze the direct and indirect historic, cultural, economic, and social effects: The BLM plans on cutting 47,097 acres and 7,746 AUMs from livestock grazing use. However, there is inadequate or no review, analysis, or research on how this drastic cut in livestock grazing will impact the cultural, economic and social effects. Further, this area has been used for livestock grazing for more than 120 years, which would mean that the cut in livestock grazing would also have a negative effect on the historic use of the area. DRMP/DEIS at 2-117, 2-13.	n	<p>Thank you for your comment.</p> <p>The reduction of grazing varies little throughout the alternatives. Table 2-6.2 (pg 2-116 through 2-120) shows that: 1) 434,154 acres would available to livestock grazing under all alternatives. Total acres permitted for livestock grazing ranges between 386,092 acres and 387,057, similar to the current level of 387,057 acres. The 47,097 acres of assumed loss described in the comment, likely includes the 9,522 acres of isolated parcels not included in allotments, the 28,387 acres of Pryor Mountain Herd Area, and the 9,021 acres available for prescriptive use. Currently these acres are closed to permitted livestock grazing; therefore there would be no loss of these acres. Additionally, under alternative C and D, 9,021 acres that are currently not permitted to livestock grazing could be opened to prescriptive grazing. 2) The 7,746 AUMs of assumed loss are the currently suspended AUMs. Under alternative B these AUMs would be maintained as suspended, Under alternative C these AUMs would be available for livestock grazing, and under alternative D BLM could adjust these AUMs, which includes the ability to make these AUMs available for livestock grazing based upon resource condition.</p> <p>Because the "assumed cuts" would be of little change compared to current management, and the fact that currently closed areas could be open to prescriptive grazing, a detailed review or analysis of impacts to cultural resources, economics, or environmental justice.</p> <p>No net change in AUMs is expected in the decision area as a result of any of the alternatives, as stated on pg. 4-472 of the DEIS. More AUMs are permitted than are in use, therefore, the suspension of 7,746 AUMs would not reduce actual livestock grazing in the field office area. The DEIS analyzes the employment and income consequences of grazing, by alternative, on pg. 4-605 of the DEIS. The livestock grazing analysis uses the best available information from BLM grazing permits and a peer-reviewed method of estimating employment and income associated with livestock grazing, as described on pg. 4-595 of the DEIS. The social analysis addresses the heritage values of ranching on pg. 4-589 of the DEIS.</p>
DR-MTDK-BL-13-0171-5	Social/econ	Some of the farmers and ranchers with private land included in the DRMP are third and fourth generation farmers and ranchers, and many others have lived in the area the majority of their lives. The proposed management plan will impact these people's ability to make a living, thereby destroying the ranching culture of the area. The limited access will also preclude them from enjoying their traditional family activities. The area included with DRMP includes counties with a declining population and tax base, and an older, more poverty stricken	n	<p>No net change in AUMs is expected in the decision area as a result of any of the alternatives, as stated on pg. 4-472 of the DEIS. More AUMs are permitted than are in use, therefore, the suspension of 7,746 AUMs would not reduce actual livestock grazing in the field office area. The DEIS analyzes the employment and income consequences of grazing, by alternative, on pg. 4-605 of the DEIS. The livestock grazing analysis uses the best available information from BLM grazing permits and a peer-reviewed method of estimating</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		population. Additionally, as the tax base and tax revenues dwindle, funding to the local schools will dwindle, which will also hinder these families' ability to raise their children in the area. The BLM should have taken the required steps to preserve the cultural heritage of ranching in the area covered by the DRMP.		employment and income associated with livestock grazing, as described on pg. 4-595 of the DEIS. The social analysis addresses the heritage values of ranching on pg. 4-589 of the DEIS.
DR-MTDK-BL-13-0171-5	Social/econ	Some of the farmers and ranchers with private land included in the DRMP are third and fourth generation farmers and ranchers, and many others have lived in the area the majority of their lives. The proposed management plan will impact these people's ability to make a living, thereby destroying the ranching culture of the area. The limited access will also preclude them from enjoying their traditional family activities. The area included with DRMP includes counties with a declining population and tax base, and an older, more poverty stricken population. Additionally, as the tax base and tax revenues dwindle, funding to the local schools will dwindle, which will also hinder these families' ability to raise their children in the area. The BLM should have taken the required steps to preserve the cultural heritage of ranching in the area covered by the DRMP.	n	No net change in AUMs is expected in the decision area as a result of any of the alternatives, as stated on pg. 4-472 of the DEIS. More AUMs are permitted than are in use, therefore, the suspension of 7,746 AUMs would not reduce actual livestock grazing in the field office area. The DEIS analyzes the employment and income consequences of grazing, by alternative, on pg. 4-605 of the DEIS. The livestock grazing analysis uses the best available information from BLM grazing permits and a peer-reviewed method of estimating employment and income associated with livestock grazing, as described on pg. 4-595 of the DEIS. The social analysis addresses the heritage values of ranching on pg. 4-589 of the DEIS.
DR-MTDK-BL-13-0171-6	WSR, WSA	The relevant information or impacts that the BLM failed to consider include but are not limited to: the historical and current information detailing the cultural heritage of ranching in the impacted area; the impacts of layers and layers of regulation (Wild and Scenic River designation, Wilderness Study Area designation, the National Historic Trails designation, and so on) that already exist and which all negatively affect the historic, cultural, economic, and social environment attached to the area; the DRMP limits all pipelines, phone lines, cell towers, electrical lines, and the like; but, there is no analysis of these limitations and their impact on local communities and economies. Furthermore, this exclusion forces all such linear projects on to private land without an adequate cumulative impacts analysis.	n	Thank you for your comments. In response specifically to your concern of layers and layers of regulation, the Federal land management agencies are guided in their management by a number of factors, including Acts of Congress, such as FLPMA, the Wilderness Act, the Wild and Scenic Rivers Act, etc. These Acts were passed by Congress, signed by a President of the United States of America, and are intended to benefit the entire peoples of this country, as well as protecting and enhancing those features which the people cherish and appreciate. The BLM only implement public law decisions. In many cases, the decision to designate a portion of federal lands will also benefit the surrounding communities. These intentions are found in the enabling legislations of the various Acts. The DEIS addresses the economic consequences of land and realty decisions on pg. 4-598 and pg. 4-602 of the DEIS. The analysis of existing regulations are outside the scope of this analysis. An analysis of community-level effects of linear projects is not possible in the RMP due to the programmatic level of the decision. Site-specific analysis will occur when particular projects are proposed. Such analyses will address effects to local communities and economies.
DR-MTDK-BL-13-0171-7	Social/econ	There are instances where the alternatives could affect grazing. DRMP/DEIS at However, the DRMP/DEIS makes no attempt to quantify any potential impacts to grazing. Equally important, the DRMP/DEIS does not provide any sort of comparison of the economic costs among the alternatives with regard to the impacts on grazing. The economic analysis shows economic impacts from natural gas exploration and development. However, the BLM still has not provided any analysis quantifying the potential impacts to ranching.	n	No net change in AUMs is expected in the decision area as a result of any of the alternatives, as stated on pg. 4-472 of the DEIS. More AUMs are permitted than are in use, therefore, the suspension of 7,746 AUMs would not reduce actual livestock grazing in the field office area. The DEIS analyzes the employment and income consequences of grazing, by alternative, on pg. 4-605 of the DEIS.
DR-MTDK-BL-	Social/econ	Furthermore, it is widely recognized that grazing permits have value which is capitalized into the value of a ranch. L. Allen Torell & John P. Doll, Public Land	n	Opinion: Response: No text revision necessary (Thanks for the comment. Resource outputs are the amount of a resource (e.g., AUMs, recreation visits,

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
13-0171-8		Policy and the Value of Grazing Permits, 16 W. J. AG. ECON. 174, 175 (1991). Increasing restrictions on livestock grazing on the Federal Allotments decreases the value of the permit, and thereby the value of the ranch to which the permit is attached which, in turn, could impact property tax values. Moreover, the preference right itself is often subject to taxation. Frank J. Falen & Karen Budd-Falen, The Right to Graze Livestock on the Federal Lands: The Historical Development of Western Grazing Rights, 30 Idaho L. Rev. 505, 511 (1993-1994). A decrease in the value of the preference right will therefore decrease the amount of taxes that are generated.		tons of locatable minerals, etc.) that would be available for use under each alternative. Resource specialists projected annual resource outputs based on the best available information and professional judgment. Based upon public comments, resource specialists have reviewed assumptions used in this analysis to see if they need to be changed or updated. These revised assumptions have been incorporated into the analysis contained in the DEIS. The purpose of the economic analysis is to compare the relative impacts of the alternatives and should not be viewed as absolute economic values. Previous modeling experience has shown that the data contained in the IMPLAN modeling system for the various sectors are accurate representations of impacts.)
DR-MTDK-BL-13-0171-9	Social/econ	In summary, the BLM's economic analysis is deficient because it provides no data to indicate that the BLM actually did any analysis showing the impact that the alternatives would have on ranching, local communities, towns or the other individuals impacted by the DRMP. While acknowledging that the various alternatives could increase costs or reduce income to ranchers, the BLM makes no attempt to quantify these costs, or even to provide a comparison of the relative costs associated with implementing different alternatives. Also, much of the data added in the DRMP is not on point, is speculative, is not timely and provides no detailed economic analysis of the specific impacted area. Clearly, the BLM has failed to follow NEPA's requirement to "assess and discuss the secondary [socio-economic] effects of the project in question."	n	The IMPLAN data are comprehensive - it includes data from both metropolitan and non-metropolitan areas. It is neither feasible nor desirable to conduct economic impact analyses on very small scales (e.g., zip code level) due to the economic linkages between communities. A small-scale IMPLAN analysis would fail to capture the labor and trade flows between communities and the economic consequences would be underestimated. As a result, consequences particular to small communities are addressed in the social analysis. The social analysis addresses environmental justice considerations on pg. 4-590, which describe the potential for disproportionately adverse effects on low income individuals and communities.
DR-MTDK-BL-13-0172-1	Realty, Cadastral Survey, and Lands	These comments are submitted in behalf of three landowners in the Custer Montana area: Junction City Ranch Co ("JCR"), Allen Creek Ranch (owned by its founder George Larsen together with Russ Waddington, and referred to as "Larsen"), and the Gordon Plotts and Richard Swanson Ranch ("Plotts and Swanson") and concern the following described public lands, administered by the Bureau of Land Management, and located in Yellowstone County, State of Montana ("BLM lands");: Township 5 North Range 33 East Section 12: NE 1/4 and S 1/2 These BLM lands are dry-land grazing lands situated within a larger private pasture enclosed by a barbed wire perimeter fence. The BLM lands are surrounded on all sides by privately held lands, without access by public roads or rights of way. The three land owners join in requesting that the described BLM lands be reclassified as "Category III: Disposal lands" pursuant to Section 3.19.1 Land Tenure Adjustments and Access of the Draft Resource Management Plan. Sale of these lands is justified because they have low resource value, and are isolated and fragmented from other public land ownerships, making them difficult and uneconomic for the BLM to manage. Attached is a topographic map of the area in question including the private pasture identified as "East Pasture". The East Pasture includes about 8 sections owned by JCR and 1 1/4 sections owned by Larsen. Plotts & Swanson Ranch owns the allotment rights to the Section 12	n	Thank you for your comment. Text has been edited in response to your comment.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		BLM land, and has subassigned their rights in the NE 1/4 to Larsen and the S 1/2 to JCR. Plotts & Swanson, Larsen and JCR own additional abutting land interests outside of the East Pasture, and have an agreement that if and when these BLM lands are offered for sale and are purchased by any of them, subsequent transfers would be made between themselves so as to refigure ownerships and increase the efficiencies of each of their respective operations.		
DR-MTDK-BL-13-0174-1	ACEC, Fire Mngt	The BLM ownership in the Grove Creek area is greatly interspersed with private lands. Some of these private lands are mine. This is the exact wrong place to let natural fires burn and the exact wrong place to not fight fires with equipment. In fact it would absolutely be negligent to allow a fire to burn or not stop it with the best tools available should it then burn on to private lands. We all know a small wildfire in eastern Montana is only one wind event away from being extremely large. A fire you let burn can be gone in an instant. I am going on record to say that should you chose to let a fire burn or not use equipment to stop it and it then burns on to my land, I will hold you responsible for damages in every way. You will have knowingly made a decision to not do everything (or anything) to have stopped it and once it burns my land your actions and decisions will have caused damage to my land. It's called negligence at that point. What about all the houses that are in the area? You can't just let fires burn in an area like this with so much interspersed private land and houses. You can't just let it burn. Even the National Park Service now realizes Let It Burn is a bad idea and isn't socially acceptable after 1988. Wouldn't a natural fire that is again one wind event away from a large wildfire also have negative effects to sage grouse and their habitat? An inevitable large wildfire that began as a natural fire that was left to burn or wasn't suppressed with equipment would destroy a lot of sagebrush and habitat in the core sage grouse areas. A large wildfire in this area would be bad for sage grouse and would have large negative effects to the species. You have not adequately analyzed for these inevitable negative effects. You will need to analyze for these very likely negative impacts to both private lands and sage grouse. At the current time the EIS is extremely inadequate for both.	N	<p>Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the B&PPNM RMP/EIS.</p> <p>Please see table 2-6.3 Grove Creek</p> <p>Please see Appendix E for the resource evaluation on this ACEC. Also please refer to FLPMA Sections 103, 201, and 202 for the direction which it provides regarding the high priority BLM is to give in the designation and management of ACECs.</p> <p>In response to your comment, the text in Alternative D for the Grove Creek ACEC of the Proposed RMP and Final EIS has been revised to state: Wildfire management (natural ignitions) for resource benefit. Full range of fire management activities would be used in ACEC in response to human-ignited fires. Use of heavy equipment and retardant would be avoided unless approved by authorized officer.</p>
DR-MTDK-BL-13-0176-1	Travel Mngt	RE: "Horsehief" management area I would like to recommend that a portion of this area be dedicated to "full sized" OHV use. There is a portion that would lend itself well to "rock-crawling". As the majority of BLM recreation users have specific areas to recreate in and also dedicated areas for hiking, biking, motorcycle riding, atv use, bird watching, and even "quiet areas", I ask the BLM to consider some areas for these individuals.	n	Thank you for your comments. The BLM has in the past requested additional information regarding the possibility of this area as a designated "rock crawling Area" but has not received additional information from the public to consider. A BLM staff review has not found a suitable area on public lands.
DR-MTDK-BL-13-0176-2	Travel mngt	RE: Pryor Mtn. area I ask that you re-evaluate this area, specifically routes that you want to close. Many of these so called routes are listed as duplicate (going to the same destination), whereas the individuals who choose a specific route more than likely want to "experience the trip", more than "the destination". The "recreational touring", specifically utilizing a jeep or other full sized 4x4, consider	n	Thank you for your comments. Based on yours and other comments the BLM has altered several of its decisions regarding Travel routes within the Pryor Mountains area, including route PM 1023, which is a route referenced. This route will be classified as open for all vehicle sizes.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		what the BLM calls "bad roads" or "impassible" as Great routes. Please consider re-evaluating your routes and possible classifying them @ different levels or even just posting them as "extreme travel", travel at your own risk, may cause vehicle damage etc.. The switchback areas on the east slopes are a good example, these you have classified as ATV only, when they are passable with "jeep" type vehicles and also UTE's.		
DR-MTDK-BL-13-0176-3	Travel Mngt	PM1023 is noted to have RS2477 designation, this route should defiantly remain open to "all" for recreation as well as travel purposes. I would also like to make a comment that there is a route between PM1017 and PM1024 that is still not marked (but appears on the map).	n	No regulations currently exist to either assert or recognize R.S. 2477 ROWs. It is beyond the scope of the RMP to recognize or reject RS 2477 assertions, and this issue is not addressed in the RMP. At such time as a decision is made on RS 2477 assertions, BLM will adjust its travel routes accordingly, if necessary.
DR-MTDK-BL-13-0176-4	Travel Mngt	PM1084; keep this open to access Forest Service routes and PM1079 to allow for that "different experiences" going up the mountain.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS. On a specific note, the routes in Stockman Canyon and Graham Canyon are designated as "open" in the RMP preferred Alternative Purposes. Refer to map 146
DR-MTDK-BL-13-0176-5	Travel Mngt	In the Cottonwood/Weatherman area; CW2024 & CW 2025 Routes should remain open to gain hunting access to State lands, and also for vehicle exploring of the area.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS. In regards to your specific comment regarding access to the Montana State Land Parcel, the RMP has a range of possible decisions. In this case, the decision to ensure adequate public access resulted in CW 1030, the proposed access route, being closed and CW 2024 being designated as "open" while CW 2025 remains unchanged.
DR-MTDK-BL-13-0179-1	Coal	BLM's revisions of the RMP are largely focused on sage-grouse conservation and the master leasing plan for oil and gas. However, since this is the first update of the RMP in almost 30 years, and it is intended to guide land use decisions for the next 20 years, BLM should update the coal information and management objectives within the resource planning area. In Chapter 1, the EIS states a management objective to "recognize the nation's need for domestic sources of minerals, food, timber and fiber, and incorporate requirements of the Energy Policy and Conservation Act (EPCA) Reauthorization of 2000." Draft RMP/EIS at 1-5. This plan falls short of meeting that objective. BLM has not considered new technologies, economics and information on coal development potential in the area and simply evaluates the coal exploration and development in terms of existing condition. Further, BLM has defined an alternative that contradicts the requirements of EPCA by proposing (in Alternative B) to close all	N	Thank you for your comment. The B&PPNM RMP/EIS did not consider a Master Leasing Plan (see section 1.4.1.3). The possibility that future coal leasing may be associated with in-situ coal gasification and coal to liquids type projects was added to the text. Alternative B is just one of the alternatives in the range of alternatives analyzed. Alternative D is the Preferred Alternative. The discussion of the coal resources in the planning area has been enhanced and moved from Appendix M to Chapter 3.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		of the resource area to coal leasing, except for that area which has been leased. As discussed further below, this RMP/EIS should realistically evaluate the potential for exploration and development of coal over the life of the RMP.		
DR-MTDK-BL-13-0179-10	Coal, Social/econ	B. Economic Impact The Draft RMP/EIS significantly underestimates the positive economic impact that coal exploration and development has on local employment and economies. Id. at 4-601. As previously discussed, it is reasonable to assume that there will be considerable exploration within the life of the RMP, and that some economic coal deposits will be developed. At a minimum, the economic benefits of potential mine development, beyond the estimated 2,680 acres of federal mineral estate identified in the Draft RMP/EIS, should be evaluated.	N	Per requirements of NEPA as noted above, the DRMP/EIS provided analysis of the effects of each alternative's actions on Coal. "Socioeconomic impacts and the method of analysis are described in Section 4.3.1 of the DRMP/EIS. For each alternative, the DRMP/EIS describes the impacts on the region's natural gas production, regional housing, regional income, tax revenues, local government expenditures, population, housing, community stability and connectiveness, quality of life, and other social and community services. Under Alternative D, the pace of coal production and, therefore, the socioeconomic impacts, are expected to be very similar to Alternative A, the current management situation.
DR-MTDK-BL-13-0179-11	Coal, Social/econ	VI. Impacts to Coal Aside from the inconsistent information regarding acres closed to coal leasing discussed above, the Draft RMP/EIS fails to provide any information regarding the impact of the RMP's other management direction on coal development. For instance, Alternatives B, C, and D would each impose significant sage-grouse conservation restrictions on solid mineral leasing. Table 2-6.2 indicates that within sage-grouse protection priority areas and restoration areas coal mining would only be allowed via sub-surface methods and all mine related appurtenant facilities would be placed outside of the priority protection habitat. Id. at 2-100. Likewise, Appendix AB describes mitigation measures and conservation actions for greater sage-grouse habitat, including measures and actions required for solid minerals. See id. at AB-13-15. Those measures and actions have the potential to have significant impacts on solid mineral development. For instance, surface use would be subject to seasonal restrictions near active leks and crucial sagegrouse wintering areas. Id. at AB-14. The Appendix also includes a vague, open-ended requirement for off-site mitigation, such as habitat creation or acquisition of conservation easements. Id. at AB-13. However, the Draft RMP/EIS provides no analysis of how those or other environmental restrictions would impact solid mineral leasing. The entire effects analysis is limited to (inconsistent) identification of areas closed to leasing and a discussion of the process for analyzing future coal leasing proposals. Id. at 4-421. BLM should revise the RMP/EIS to explain the effects of the various management decisions in the alternatives on solid mineral leasing.	n	Per requirements of NEPA as noted above, the DRMP/EIS provided analysis of the effects of each alternative's actions on Coal. "Socioeconomic impacts and the method of analysis are described in Section 4.3.1 of the DRMP/EIS. For each alternative, the DRMP/EIS describes the impacts on the region's natural gas production, regional housing, regional income, tax revenues, local government expenditures, population, housing, community stability and connectiveness, quality of life, and other social and community services. Under Alternative D, the pace of coal production and, therefore, the socioeconomic impacts, are expected to be very similar to Alternative A, the current management situation.
DR-MTDK-BL-13-0179-12	Coal	VIII. Appendix M -" Coal Resources In addition to the broader issues discussed above, GNP has specific comments on statements made in Appendix M regarding coal resources. In its background discussion, Appendix M does not mention the Carpenter coal bed. The Carpenter coal bed occurs 35 to 65 feet below the McCleary coal bed and is significant in the northeastern portion of the Bull Mountains coalfield." GNP conducted a substantial exploration drilling	N	The development potential of the Carpenter seam in the Bull Mountain coalfield has been included. GNP's exploration efforts in the Bull Mountain coalfield have been acknowledged. The surface mining limit of the Mammoth seam has been readdressed.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		<p>program in 2012, and the Carpenter bed was observed to be of consistent thickness and of greater areal extent than the McCleary coal bed. The Carpenter bed should be noted here as a coal bed of interest. Appendix M states that the Keene underground mine produced coal from the McCleary coal bed. Id. at M-2. However, according to the USGS, the Keene mine produced coal from the Roundup coal bed, not the McCleary coal bed.¹² GNP agrees that there are approximately 604 million tons of Mammoth-Rehder coal amenable to surface mining and that these coal resources are about 90% recoverable. Draft RMP/EIS at M-3. The statement that surface mining be limited to a 1/4 to 3/4 mile wide "strip" along the outcrop of the Mammoth-Rehder coal bed requires clarification. Draft RMP/EIS at M-3. The referenced figure M-4 clearly shows that the area containing the approximate 604 million tons of coal resources that are amendable to surface mining is significantly greater than 1/4 to 3/4 mile.¹¹ See Woolsey, Richards, Ralph, Lupton, et al, "The Bull Mountain coal field, Musselshell and Yellowstone counties, Montana", USGS Bulletin: 647, 1917, available at http://pubs.usgs.gov/bul/0647/report.pdf.¹² Id. GNP agrees that there are more recoverable Mammoth-Rehder coal tons available through surface mining methods (544 million tons) than there are through underground mining methods (354 million tons). Id. However, the statement that nearly the entire Mammoth-Rehder coal bed may be developed through underground methods is in contradiction to the fact that Appendix M recognizes that more coal tons are recoverable through surface mining than through underground methods. According to the USGS, the Mammoth-Rehder coal bed is the thickest and most important in the Bull Mountains coal field.¹³ Thus, utilization of both underground and surface methods will be necessary and appropriate to develop the entire Mammoth-Rehder coal bed. The reference to the "Carpenter Creek" bed, id. at M-4, requires clarification. Two coal beds of importance to both surface and underground development occur in the Carpenter Creek resource area: the Carpenter coal bed and the McCleary coal bed. GNP disagrees with the statement that only in the Bull Mountains coal field may federal coal be developed through surface mining methods. Id. at M-5. There are areas of shallow coal both north and south of the Bull Mountains coal field that may be amenable to surface mining methods. Suitability criteria should be separately analyzed on a site specific basis. Also, the Carpenter bed should be noted here as a coal bed of interest along with the McCleary bed. Appendix M states: "Surface owners of land overlying federal coal from both the Mammoth-Rehder and McCleary beds were consulted to determine their preference for or against leasing of their land for surface mining. The results of the consultation are shown in Table 2.3. Federal coal was found unacceptable for further consideration where the surface owners responded negatively to surface mining." Id. BLM should clarify that this consultation occurred in 1984 or earlier; there has been</p>		<p>This statement has been removed from the text.</p> <p>The surface and underground development potential of the McCleary and Carpenter seams have been added to the text.</p> <p>Coal seams present in other coalfields within the planning area may have surface mine development potential. However, BLM does not have sufficient data to define those areas. It was also added that a surface minable resource in the Bridger seam may exist in the Joliet-Fromberg coalfield.</p> <p>The date when the surface owner consultation was conducted was added to the text.</p> <p>The development potential of the McCleary and Carpenter seams in the Carpenter and Lost Horse Creek drainages, and in the South Divide area was added to the text. BLM does not have the data to characterize the coal resources in the area west of Musselshell.</p> <p>The appropriate figures have been revised.</p> <p>The coal screening process would be applied to lease applications that propose surface mine development.</p> <p>The unsuitability criteria and citation have been revised. The references to Appendices 2.4, 2.5, and 2.6 have been removed.</p> <p>Surface mining limitations pertaining to overburden depths and stripping ratio limits have been removed from the text.</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		<p>no updated surface-owner consultation for this RMP planning effort. Also, Table 2.3 does not exist in Appendix M. In Figure M-2, id. at M-7, the area that defines the "McCleary Coal Bed" should be expanded to the west to the town of Musselshell and to the northwest along the outcrop of the Carpenter coal bed. The Carpenter bed should also be mentioned here as a significant coal bed of interest for surface and underground mining. Appendix M states that "[t]here are 9,360 acres of federal coal in the Bull Mountains found acceptable for further consideration for leasing, pending further study (see figures 2.1 and 2.2)." Id. As there are no figures 2.1 and 2.2 in the appendix, this is presumably a reference to figures 2.1 and 2.2 in the 1984 Record of Decision for the Billings RMP. BLM should (1) provide those figures in this document, (2) expand the areas identified as "areas found acceptable for further consideration, pending further study" in recognition that no recent surface-owner consultation has occurred, and (3) acknowledge that other areas may also be acceptable on a case-by-case basis after application of the coal screens future leases by application are consistent with the RMP direction.¹³ See Woolsey, Richards, Ralph, Lupton, et al, "The Bull mountain coal field, Musselshell and Yellowstone counties, Montana", USGS Bulletin: 647, 1917, available at http://pubs.usgs.gov/bul/0647/report.pdf. BLM cites to the 1981 version of unsuitability regulations found at 43 C.F.R. § 3461.1. Id. at M-18. These regulations were revised in 1987, so BLM should update the citation and related text. Similarly, the references to Appendices 2.4, 2.5, and 2.6, id. at M-19, are improperly carried over from the 1984 RMP Record of Decision. BLM should provide the information contained in those appendices in this RMP/EIS. Appendix M also states that "[d]ue to the lower economic feasibility of surface mining coal at depths greater than 100 feet (the moderate potential coal), resulting in larger surface acreage disturbances, it will be recommended to allow surface mining only with a maximum 10:1 stripping ratio (high potential coal) limit." Id. at M-20. Since, as noted above, the economic viability of a potential surface mine depends on a variety of factors, in addition to overburden, it is inappropriate to use a blanket standard of 100 feet of overburden when determining the economic feasibility of surface mining. Likewise, GNP disagrees with the recommendation that a maximum 10:1 strip ratio be applied to potential surface mines in the Bull Mountains. A 10:1 strip ratio alone cannot determine the areas suitable for surface mining.</p>		
DR-MTDK-BL-13-0179-13	Wildlife	<p>The use of the broad habitat identifications in the RMP (see Maps 23, 24, and 168) can provide a management framework for BLM, but site-specific studies, habitat delineations, and biologic surveys are needed to provide for a fair evaluation of a coal development proposal, the suitability of the area for mining, and development of potential mitigation measures. Prescriptive mitigation measures for any sage-grouse habitat do not provide allowances for creative, economic means of protecting the species. GNP supports the use of adaptive</p>	n	<p>Thank you for your comment. The B&PPNM RMP/EIS is following the consistent management prescriptions and guidance for GRSG. In following the management prescriptions, please see Appendix AA (section F) for mitigation measures. The BLM and the Forest Service complied with the NEPA by including a discussion of measures that may mitigate adverse environmental impacts of the alternatives in the DRMP/EIS. See 40 CFR 1502.14(f), 1502.16(h). Potential forms of mitigation include: (1) avoiding the impact</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		management techniques for sage-grouse mitigation. Alternatives B, C, and D propose to limit coal leasing in sage-grouse priority protection areas (PPAs) to sub-surface methods, with all mine related appurtenances outside the PPA. See id. at 2-100. GNP does not support this proposed management decision for two reasons. First, it ignores the coal resource potential in areas within and adjacent to the proposed PPAs without adequately analyzing the value or development potential of the resource. This is not consistent with federal energy policies. Second, the proposed stipulation does not take into account current and future technology advances for mining and mitigation potential within these areas, as well as potential site-specific analyses of proposed activities. Relying on site-specific NEPA analyses, coal screening, and development of mitigation measures to ensure sage-grouse protection is more appropriate and consistent with BLM's multiple-use mandate than blanket prohibitions. A more reasonable approach would be to require a sage-grouse management plan for any coal exploration or development proposals within the PPAs. Additionally, sage-grouse PPAs and restoration areas are adjacent to or interspersed with the lands not currently managed by BLM, and are part of the GNP checkerboard mineral rights holdings in certain areas. It should be noted that unilaterally specifying these areas for special treatment for sage-grouse conservation effectively expands the management practices to these interspersed private sections, making them unavailable for development. GNP is willing to work with BLM to address sage-grouse management in these areas where the minerals and surface management is mixed, on a site-specific basis to ensure that there is a reasonable balance of resource management.		altogether by not taking a certain action or parts of an action; (2) minimizing impacts by limiting the degree or magnitude of the action and its implementation; (3) rectifying the impact by repairing, rehabilitating, or restoring the affected environment; (4) reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; or (5) compensating for the impact by replacing or providing substitute resources or environments. 40 CFR 1508.20. Taking certain is only one of many potential forms of mitigation. The BLM and the Forest Service must include mitigation measures in an EIS pursuant to the NEPA; yet the BLM and the Forest Service have full discretion in selecting which mitigation measures are most appropriate, including which forms of mitigation are inappropriate
DR-MTDK-BL-13-0179-14	Coal	GNP objects to recommended mitigation measures proposed for solid minerals that restrict surface use or disturbance. Id. at AB-14. BLM has proposed appropriate general criteria that are sufficient to protect the greater sage-grouse on an activity specific proposal: analysis of the habitat and population in a project-specific analysis, minimization of disturbance, incremental development, offsite mitigation as necessary, and appropriate reclamation and removal of redundant facilities. Because these general criteria provide a sufficient framework to ensure the conservation of the sage-grouse, there is no basis for the proposed restrictions that would require surface-use restrictions for solid mineral development. These proposed restrictions, as well as requirements for location of roads, pipelines, wells, and storage facilities, appear to be lifted out of the restrictions for fluid minerals and are not applicable to solid minerals. These restrictions ignore the basic difference in development of fluid and solid minerals and are not supportable	n	Thank you for your comment. Text in Chapter 2 – alternatives table - has been modified in chapter 2 – alternatives table to reflect coal leasing/mitigation measures.
DR-MTDK-BL-13-0179-	Coal	While the Draft RMP/EIS pays little attention to coal development, it includes numerous provisions regarding oil and gas development. These provisions include areas closed to oil and gas leasing and various no-surface-occupancy	n	The oil and gas lease terms (NSO, CSU, etc) apply specifically to Oil and Gas leasing and not to coal. Coal development, is subject to its own coal screening process

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
15		(NSO) and controlled-surface-use (CSU) stipulations to protect sensitive resources. For instance, under Alternative D, "an estimated 357,536 acres of the decision area's federal mineral estate is administratively unavailable (No Lease) for oil and gas leasing or has major constraints (NSO, CSU)." Draft RMP/EIS at 4-75. In the past, some BLM offices have interpreted oil and gas NSO and CSU stipulations as applicable to all mineral development, which is not consistent with the management direction of the land use plan. While taking no position as to whether these stipulations are or are not appropriate and/or necessary, because these stipulations are specific to oil and gas leasing, the RMP should expressly confirm that they are not applicable to coal leasing and development, which is subject to its own coal screening process.		
DR-MTDK-BL-13-0179-2	Coal	Future coal leasing beyond the current Signal Peak underground operation is likely within the time frame of this planning document due to an increasing international demand, particularly in Asia, for the type of high-quality steam coal found in the Bull Mountains. The availability of improved coal mining technologies currently allow extraction of coal to be conducted more efficiently than was possible at the time of the 1984 RMP. Indeed, in anticipation of continued strong off-shore demand for high quality steam coal, additional exploration has recently been undertaken in the Bull Mountains to further define coal development potential in the resource planning area. Thus, the RMP/EIS should be revised to anticipate an increase in coal leasing beyond the status quo. Significant coal exploration has been conducted by the private sector under the authorization of State of Montana prospecting permits, with potential for additional exploration under the Federal Coal Exploration License program. There is a substantial amount of public information available with which to update information about coal resources. Since this RMP planning process is intended to cover the foreseeable future of the resource area, the coal development potential within the planning area should be updated	N	<p>The recent exploration activities conducted in the Bull Mountain coalfield have been acknowledged.</p> <p>Information pertaining to the coal resources and their development potential in the planning area has been updated</p>
DR-MTDK-BL-13-0179-3	Coal	The Draft RMP/EIS only addresses the potential of conventional surface and underground (continuous miner and longwall) methods. Draft RMP/EIS at App. M. In expanding coal development potential, BLM should specifically consider (1) the impacts and improved economics of more efficient and improved mining techniques in connection with surface mining, which were not in use in 1984, (2) the potential for deployment of unconventional mining techniques-"such as the use of highwall mining techniques in connection with surface mining, the potential for underground coal gasification, coal beneficiation, and coal liquefaction-"which will enable development of some coal deposits previously considered to be uneconomic, and (3) the development and construction of mine-mouth coal gasification projects. Additionally, BLM should also acknowledge that these unconventional mining techniques have substantially less surface-disturbance impacts as compared to conventional surface mining	N	<p>The possibility that future coal leasing may be associated with coal conversion projects has been added to the text.</p> <p>The possibility that highwall mining may be incorporated in a surface mining scenario was added to the text.</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
DR-MTDK-BL-13-0179-4	Coal	In addition to underestimating coal development potential, BLM has vastly underestimated the demand for coal. There is a significant export demand for the high-quality (high-BTU) coal that exists in the Billings RMP planning area. The Energy information Administration (EIA) recently issued a report stating that "[c]oal exports from the United States in March 2013 totaled 13.6 million short tons, nearly 0.9 million short tons above the previous monthly export peak in June 2012. EIA is projecting a third straight year of more than 100 million short tons of coal exports in 2013, following annual exports in 2011 of 107.3 million short tons and record annual exports in 2012 of 125.7 million short tons. Increased Asian demand for coal contributed to the record level of coal exports from the United States in March." ⁴ The coal reserves in Bull Mountains are well situated to respond to this demand because considerable infrastructure is in place, including a rail loop to facilitate surface mining. BLM must consider this increased export demand and how the existing Signal Peak Energy infrastructure provides an advantage to Bull Mountain reserves in that market when evaluating the likelihood of additional coal development. In addition, and in direct support of the significant coal export demand, several new coal export terminals in Washington and Oregon are in the process of being permitted and developed to facilitate the coal export market: SSA Marine's Gateway Pacific Terminal in Whatcom County, Washington; Ambre Energy and Arch Coal's Millennium Terminal in Longview, Washington; and Ambre Energy's Morrow Pacific Terminal at the Port of Morrow in Oregon. ⁴ See U.S. coal exports set monthly record, http://www.eia.gov/todayinenergy/detail.cfm?id=11751 (June 19, 2013).	N	Additional text has been added to reflect that coal being produced in the planning area is currently being exported. Additional text has been added to reflect that future coal development in the planning area may increase as a result of the completion of coal export facilities on the west coast.
DR-MTDK-BL-13-0179-5	Coal	C. Map 47 -" Coal Development Areas BLM underreports the extent of the coal locations within the resource management area, as shown on Map 47. Fields within the Bighorn Basin of Montana contain some of the highest quality mineable coals in Montana. In particular, Red Lodge-Bearcreek, Bridger, and Silvertip coal fields in Carbon County should be added to Map 47 and identified as an area acceptable for further leasing consideration, pending further study. The area that defines the McCleary coal bed should be expanded to the west to the town of Musselshell and to the northwest along the outcrop of the Carpenter Seam. Also note that Map 47 (Coal Locations) and Map 2 (Federal Minerals) appear to be inconsistent. BLM should ensure that all federal coal identified on Map 47 should also be shown as federally owned minerals on Map 2.	N	Map No. 47 has been revised to reflect all areas where coal resources are managed by the BLM. The development potential of the McCleary/Carpenter seams in the Carpenter and Lost Horse Creek drainages, and in the South Divide area was added to the text. BLM does not have the data to characterize the coal resource of these two seams in the area west of Musselshell.
DR-MTDK-BL-13-0179-6	Coal	E. Northern Musselshell County GNP and BLM both have significant mineral ownership within northern Musselshell County, located north of the Bull Mountains coalfield. Though these areas have not experienced historic mining and are not well explored, the bedrock geologic maps' illustrate the presence of the coal-bearing Cretaceous Eagle and Judith River formations. As such, GNP requests that these areas be identified as "Coal Areas Acceptable for Further	N	The BLM does not have the geologic data to evaluate the coal resources in the Eagle and Judith River formations in northern Musselshell Co. The coal screening process will be applied to future lease application areas.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		Consideration" or "Coal Areas Acceptable for Further Consideration and Pending Further Study" in the RMP, and that further exploration and potential development of these coal resources be included and analyzed in the Final RMP/EIS.		
DR-MTDK-BL-13-0179-7	Coal	F. Big Horn Basin Coalfield, Carbon County, Montana Significant quantities of coal have been mined historically in Carbon and Stillwater counties, though no mining is currently taking place. ⁶ The coals within this region are located in the Big Horn Basin of Montana and are principally contained within the Fort Union Formation. ⁷ These are some of the highest-quality mineable coals in Montana with an apparent rank ranging from subbituminous to bituminous. ⁸ Four distinct coalfields have been identified in the Montana portion of the Bighorn Basin, including (1) the Bridger (including Joliet/Fromberg), (2) Stillwater, (3) Silvertip (part), and (4) the combined Red Lodge-Bearcreek coalfield (formerly the Red Lodge coalfield). Draft RMP/EIS at 3-152, M-1-"M-2.5 Geologic Map, Musselshell 30'x60' Quadrangle, Open File MBMG 386, Plate 1 of 1, available at http://www.mbm.mtech.edu/pdf/100k/musselshell.pdf . ⁶ Draft RMP/EIS at 3-152; 1999 Resource assessment of selected Tertiary coal beds and zones in the Northern Rocky Mountains and Great Plains region, U.S. Geological Survey Professional Paper 1625-A, available at http://pubs.usgs.gov/pp/p1625a/ (hereinafter USGS Professional Paper 1625-A). ⁷ See USGS Professional Paper 1625-A. ⁸ Id. Though no current mining is taking place in this region, there is significant recent and ongoing interest in developing underground projects in this region, including within the Red Lodge-Bearcreek coalfield. Beartooth Mountain Coal Company has published reports which clearly demonstrate the recent and current interest in underground mining. ⁹ Further, a USGS assessment states "an evaluation of six coal beds, each greater than 4ft thick in the Bearcreek district, Rawlins (1986) estimates that total Fort Union coal reserves in the area may exceed 700 million tons." ¹⁰ It further describes the high-quality characteristics of the coals of the area. GNP has significant coal holdings and interest in this area and believes that exploration and development of these coalfields is reasonably foreseeable within the RMP planning time frame. ⁹ See http://beartoothmntcoal.com/mine/?page_id=100 . ¹⁰ See USGS Professional Paper 1625-A.	N	<p>The text describing the coal development potential of the Red Lodge-Bearcreek/Joliet-Fromberg coalfields has been enhanced in the Chapter 2, Solid Minerals-Coal section.</p> <p>Additional information has been incorporated into the text including material from the references that are mentioned here.</p> <p>The following information was added to the text: "In late 2013, it was reported that a private company completed an exploration drilling program on non-federal coal in the Bearcreek area."</p>
DR-MTDK-BL-13-0179-8	Coal	The Draft RMP/EIS provides inconsistent information regarding the areas that BLM is recommending as being closed to solid leasable mineral development. Table 2-6.2 (Detailed Table of Alternatives) and Table 4-25 (Total Acreage Recommended for Closure for Solid Leasable Mineral Development) indicate that the following acreages will be closed to coal leasing: Alternative A 29,466 acres Alternative B 211,485 acres Alternative C 170,276 acres Alternative D 200,539 acres ID. at 2-99, 4-421. However, several other places within the Draft RMP/EIS contradict these tables and state that the following acreages would be	n	Thank you for your comment. Text will be clarified in Chapter 2.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		<p>closed to coal development: Alternative A 26,131 acres Alternative B 290,048 acres Alternative C 264,450 acres Alternative D 280,971 acres See, e.g., id. at 2-20 (Table 2-1), 4-89, 4-99, 4-165, 4-178, 4-255. BLM should clarify how many acres would actually be closed to coal leasing under each alternative. It should also provide a map that identifies, by alternative, where those closures would be located within the planning area. In light of these discrepancies and the inability to determine the actual impacts of each alternative on coal development, once this corrected information is available, BLM should provide additional opportunity for public comment.</p>		
DR-MTDK-BL-13-0179-9	Air	<p>The Draft RMP/EIS correctly reports that there have been no exceedences of air quality standards from the Signal Peak Energy mine. Id. at 4-25. However, the air quality analysis is based on an unrealistic assumption of no additional development beyond that mine. The analysis must be revised to include a complete analysis of reasonably foreseeable activities surrounding coal development. As previously noted, further exploration of coal reserves identified in the Draft RMP/EIS is probable within the life of this RMP. Much of the coal that will be further delineated in these exploration programs has potential for surface mining. Emissions from exploration and development of additional surface coal mines should be analyzed for all alternatives in the Final EIS. With respect to the BLM's proposal to require Tier 4 engines on diesel-powered drill rigs, id. at 4-11, GNP believes that such a requirement is inappropriate in the context of this RMP. Whether such extraordinary emission controls on equipment are necessary to protect air quality should be based upon model-predicted impacts as they compare to applicable EPA established air quality standards and prevention of significant deterioration increments; BLM should not presume that such controls are necessary before their actual need is demonstrated. Additionally, in Montana, the Montana DEQ is charged with the monitoring and protection of air quality, including on federal surface, under the authority of its EPA-approved Clean Air Act program. GNP believes it is wholly inappropriate for BLM to arbitrarily impose stringent emission control requirements that may not be necessary for the protection of air quality. Where air quality will be protected without such extraordinary controls, they would only serve to unnecessarily increase the cost of production and perhaps create a barrier to entry for smaller operators. GNP encourages the BLM to defer to Montana DEQ as the appropriate agency for implementation of air quality protection programs in Montana and eliminate the blanket Tier 4 engine requirement.</p>	Y	<p>The coal RFD was the basis of the air resource analysis. See the Section 4.1.1.3.1 for an explanation of Tier 2 versus Tier 4 modeled impacts. Also see the Section 1.5.3 of Appendix T for an explanation of the BLM's authority to protect air resources.</p>
DR-MTDK-BL-13-0180-1	Travel mngt	<p>2. Close Demijohn Flat route in the Pryors to motorized use. There is a culturally sensitive area here and motor vehicles would destroy it. Please make this a quiet non-motorized route for those who value the quiet and the history of this area. 3. In Bear Canyon in the Pryors please close the two track road that leads</p>	n	<p>Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		into the canyon. There are two other parallel routs in this area that provide motor routes for those that are too lazy to walk.		associated with the Billings and Pompeys Pillar National Monument RMP/EIS In regards to the Demi John Flat route, the RMP has a range of possible decisions. In this case, due to the conditions you mentioned the Alternative D has been modified to reflect the current conditions. The route will be designated as "closed to motorized vehicles" except for administrative purposes. This will not prohibit non-motorized use. Refer to map 146
DR-MTDK-BL-13-0182-1	Travel mngt	Wild Horse Protection: Seasonal road closures -" Motorized routes within the PMWHR would be designated according to the Pryor TMA. Burnt Timber Road from the East Pryor Mine (the abandoned uranium mine) to the USFS boundary and Sykes Ridge Road from the horse trap to USFS boundary would be closed to wheeled vehicles and motorized vehicles to protect wild horse foaling and their habitat (April 15 to June 15) providing consistency with the USFS seasonal closures.	n	Thank you for your comments. The BLM decision in the RMP is to protect the resources from degradation. BLM has been and intends to continue signing and rehabbing unauthorized vehicle routes throughout the FO and welcomes any assistance from any entity. BLM will be addressing many of the issues mentioned in the letter through a site specific Implementation Level Plan following the RMP.
DR-MTDK-BL-13-0183-1	Coal	BLM acknowledges that there are "Known coal resource areas with underground development potential are located in the Bull Mountains and in Carbon County" (p. 3-152). In addition to the resources with underground development potential, there is significant resource in the area with surface mining potential. Given BLM's directive to recognize and develop energy resources, this RMP should include and analyze the leasing of all surface minable resources in Bull Mountains, Carbon County and throughout the Resource Management Planning area. BLM should note that technologies such as highwall mining techniques enable access to more coal resources with higher stripping ratios than those previously considered by BLM, and mine economics can change significantly with market conditions.	N	BLM recognizes the existence of surface minable coal resources in the planning area. The coal screening process will be applied to future lease application areas that have surface mine development potential. The possibility that highwall mining may be incorporated in a surface mining scenario has been discussed. Stripping ratio limitations have been removed from the text.
DR-MTDK-BL-13-0183-2	Coal	In its analysis of RMP alternatives, the BLM underestimates the potential for future development of coal by narrowly defining the reasonably foreseeable future as the continuing mining at the Signal Peak operations under current conditions. The analysis should be expanded to include considerations for expanded operation at the existing mine, additional exploration and potential leasing within a reasonable distance to the existing mine infrastructure and additional underground and surface mining new leases in all of the known areas of coal deposits.	N	Text has been added to reflect SPE's recent coal exploration activities adjacent to its existing operation. Factors that may influence future coal development in the Bull Mountain coalfield were also discussed.
DR-MTDK-BL-13-0183-3	Coal	Signal Peak Energy currently operates at a permitted rate of 15 million tons of coal produced per year - a rate that is used for the environmental analyses in this EIS. However, the infrastructure in place at the operation could accommodate a throughput of 60 million tons of coal per year without major construction at the coal load out. It is reasonable to expect that market conditions may sustain such a production increase within the life of the RMP. State permits e.g. air permits, would require demonstrations of compliance with	n	Thank you for your comment. Text has been added to reflect the role that SPE's existing coal processing and rail infrastructure may have regarding future coal development in the Bull Mountain coalfield.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		appropriate environmental standards if production rates increase. Site specific environmental evaluation of expansion at the site would be done by the state and, in the case of development of federal coal leases, by the BLM as well. These reasonably foreseeable conditions should be included in the Chapter 4 analysis.		
DR-MTDK-BL-13-0183-4	Social/econ, Coal	Economic evaluations should also take into account future development of federal coal and expansion of Signal Peak operations. Currently, Signal Peak has 325 employees with an annual payroll of \$39 million. Federal, state and local extractive taxes contribute an additional \$40 million to the economy each year. With the addition of coal from Federal leases, additional employees may be added, and Federal lease payments will further contribute to the economy.	N	Chapter 4 currently states the following: The average annual federal coal leasing, production, tax, and royalty revenues related to BLM federal minerals are unknown at this time and would be determined based on whether the proposed Montana Federal Mineral Conveyance Act (HR 1158) passes in Congress. For analysis purposes, under all Alternatives, it is assumed that all federal coal is retained in federal ownership, and a coal lease sale covering 2,680 acres of federal coal are leased, an annual average of 2.8 million tons of federal coal are produced over the life of the lease, and price per ton of coal in Montana is \$18.11 (Energy Information Administration, 2012). Future coal leasing is uncertain due to lack of infrastructure (e.g., rail lines) near potential coal reserves and low international coal prices.
DR-MTDK-BL-13-0183-5	edits	BMPs for mineral exploration and development should be clarified to reflect that these relate to oil and gas exploration and development. Not all of the recommendations are appropriate for coal exploration or development.	n	text has been modified in Appendix B to reflect your comment.
DR-MTDK-BL-13-0183-6	NEPA, wildlife	The BLM proposes Mitigation Measures and Conservation Actions for Greater Sage Grouse Habitat. The recommended measures for solid minerals clearly do not reflect mining practices and appear to be more consistent with BLM's approach to development of fluid minerals. In describing its recommended practices for solid minerals, BLM appropriately recognizes the need to develop mitigation measures during activity level planning. Many of the recommendations for solid minerals are not appropriate, for a variety of reasons. First, coal is located where naturally deposited and recovery of coal must be done in an economically viable fashion where the coal is located. Location of surface disturbance and surface facilities may not be optional, particularly in the case of surface mining, and should only be evaluated on a site specific basis, not specified in a general BMP. While seasonal restrictions may be possible when using certain types of technologies e.g. coal gasification, it is inappropriate to unilaterally apply seasonal restrictions to solid mineral development without a clear recognition that the BLM is effectively withdrawing coal resources without the proper findings. Secondly, the BLM has erroneously attempted to apply strict BMP requirements proposed for fluid minerals development to solid minerals development without consideration of the nature of solid minerals extraction. Appendix AB includes BMPs for location of pipelines, roads and holding tanks - facilities that are connected with fluid minerals management but are generally only incidental to mining. Surface mining is often the most economic means of recovery of solid minerals, including coal, and by nature does not lend itself to	n	The BLM and the Forest Service complied with the NEPA by including a discussion of measures that may mitigate adverse environmental impacts of the alternatives in the DRMP/EIS. See 40 CFR 1502.14(f), 1502.16(h). Potential forms of mitigation include: (1) avoiding the impact altogether by not taking a certain action or parts of an action; (2) minimizing impacts by limiting the degree or magnitude of the action and its implementation; (3) rectifying the impact by repairing, rehabilitating, or restoring the affected environment; (4) reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; or (5) compensating for the impact by replacing or providing substitute resources or environments. 40 CFR 1508.20. Taking certain is only one of many potential forms of mitigation. The BLM and the Forest Service must include mitigation measures in an EIS pursuant to the NEPA; yet the BLM and the Forest Service have full discretion in selecting which mitigation measures are most appropriate, including which forms of mitigation are inappropriate.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		<p>seasonal restrictions as proposed in Appendix AB. If implemented as proposed, restrictions of activities to certain times and dates would have significant socioeconomic impact within the resource management area, potentially necessitating long furloughs for workers, reduction of production capacity and rendering certain mineral resources uneconomic. Thirdly, the BLM has not provided sufficient rationale or basis for some of the restrictions. For example, BLM suggests that roads should not be designed to standards any higher than necessary to accommodate their intended purpose. While we are sure that the BLM does not intend for any road to be unsafe for travel, this restriction implies that only minimum safety standards can be used as a basis of design. SPE specifically objects to this requirement as safety (personnel and public) is the highest priority in our operations and we are unwilling to accept minimum standards. The restriction on ROW designations for counties on mining development roads is not justified or supported by any rationale that show greater protection for sage grouse habitat. County maintenance of mine access roads is often the most safe, efficient and economic means to support transport of personnel, equipment and supplies to mine related activities such as exploration and operations and should not be precluded by some unsupported BMP. Fourthly, the operations restrictions, in addition to the misapplication of fluid mineral restricted actions to solid minerals, do not necessarily provide the best environmental balance when evaluated on a project or site specific basis. For example, there are many requirements in this appendix referring to pit and impoundment construction that is not applicable to mining operations and include extraneous requirements not directly applicable to the greater sage grouse (e.g.: equip tanks and other above ground facilities with structures or devices that discourage nesting of raptors and corvids; eliminate threats from West Nile virus). Man camps are rarely used in solid minerals operations and sage grouse mitigation measures should be specifically designed for mining or exploration activities that use them. The ROW siting requirement to reduce disturbance to sagebrush habitats may not be the best overall environmental option for a solid mineral project, when considering other resources and habitat types. Reclamation requirements for access roads and well pads is not appropriate for this section. Appendix T has been included for oil and gas activities. SPE requests conflation in the FEIS and final RMP that these requirements are not applicable to activities related to coal resource development. Exploration and water well drilling should not be required to be done using drill rig engines that meet Tier 4 emission standards.</p>		
DR-MTDK-BL-13-0183-7	Coal	<p>The BLM states that "Surface owners of land overlying federal coal from both the Mammoth- Rehder and McCleary beds were consulted to determine their preference for or against leasing of their land for surface mining. The results of the consultation are shown in Table 2.3. Federal coal was found unacceptable</p>	N	<p>The date when the surface owner consultation was conducted was added to the text. The coal screening process would be applied to future lease application areas.</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		for further consideration where the surface owners responded negatively to surface mining." BLM did not mention that this consultation occurred in 1984 or earlier. Furthermore there has been no updated surface-owner consultation to support this draft RMP. Table 2.3 does not exist in Appendix M. SPE requests that coal screening be conducted in response to specific proposals using current data for future coal leasing actions.		
DR-MTDK-BL-13-0197-1	Edits	Noticed one thing that looks like a small typo on page 3-165, 3rd paragraph: "The BLM does not anticipate that CBNG drilling and development would result in any different environmental impacts than conventional drilling and development. In contract to the Powder River Basin (PRB), coals in the Big Horn and Bull Mountains Basins are at greater depths."	n	Thank you for your comment. Text has been edited in response to your comment.
DR-MTDK-BL-13-0204-1	Livestock Grazing	Chapter 2, Page 52 Climate Change The alternatives are different in how they relate to climate change. Climate change is predicted to bring a warmer and drier climate to interior western North America. This means that water will become more precious and distribution of water among livestock operations, farming, fisheries and wildlife and wetland and riparian vegetation will become contentious. Thus, maintaining in-stream flows that benefit wildlife will become even more important as the climate warms etc. In this way the various alternatives are different in how they deal with climate change. Drought and grazing have similar effects on rangelands by favoring lower-growing, less productive species. As the climate warms, stocking rates will probably have to be adjusted down. Again, different alternatives deal with livestock grazing differently and this relates to climate change.	n	Thank you for your comment.
DR-MTDK-BL-13-0204-10	Edits	Chapter 3, Page 41 Table 3-13 Utah juniper (<i>Juniperus osteosperma</i>) occupies many thousands of acres on the south side of the Pryors.	N	Thank you for your comment
DR-MTDK-BL-13-0204-11	vegetation	Chapter 3, Page 44, Rangelands A Montana Natural Heritage report describes several plant communities from the Pryor Mtns. that are considered rare in Montana. Recognizing and doing protective management is a "coarse-filter" approach to conserving biological diversity. The existence of these communities is mentioned in the ACECs and should also be mentioned here.	n	Due to the size of the document, the major ecological systems and communities were discussed. While rare communities are important, the size and scale of these communities precluded in-depth discussion in this section in the range and shrubland section. In addition, the special status species section (3.6.6) does reference that the East Pryor ACEC has documented special status species.
DR-MTDK-BL-13-0204-12	WILD HORSES, PMWHR	Chapter 3, Page 112, Wild Horses Figure 14 of Ricketts et al. (2004) indicates that much of the Sykes Ridge area (mid-elevation) has an SI index of 0.1 which is very poor condition as we understand it. Many of the steep slopes provide little forage but are still subject to trampling degradation.	N	Thank you for your comment. The Natural Resource Conservation Service Survey and Assessment you are referencing does not have any Site Index of 0.1. However the presence of wild horses does not ultimately mean that the ecological condition is due to their presence as opposed to a cumulative effect of past uses and practices. Horse trampling on steep slopes would be difficult as horses tend to follow trails in order to pass between grazing areas.
DR-	water	Chapter 4, Page 159, Impacts from vegetation Impacts from timber harvest in a	n	While we agree that the impacts identified in your comment can occur,

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
MTDK-BL-13-0204-13		watershed may not always be "negligible." Loss of trees can cause more water going into shallow groundwater and eventually into streams because trees take up water and lose it through transpiration. Removing trees can result in greater snowpack and higher groundwater. Removing trees can also cause higher earlier runoff due to lack of shade protecting the snowpack.		especially from large scale projects or on a cumulative basis, at the scale of treatment identified under any of the alternatives, these impacts would be undetectable and therefore negligible
DR-MTDK-BL-13-0204-14	water	One rangeland improvement action can be the construction or maintenance of stock ponds. These ponds can capture significant amounts of spring runoff that would otherwise be transported downstream and possibly causing the flood conditions necessary for cottonwood and willow rejuvenation.	n	Thank you for your insightful comment. This will be considered during NEPA analysis of any site specific project involving stock pond construction.
DR-MTDK-BL-13-0204-15	SS Plants	Chapter 4, Page 222, Special Status Plants Herbicide treatment by airplane or boom sprayers is much more likely to be detrimental than by hand spot spraying.	n	Please also refer to comment in the ACEC section. Please refer to Appendix B. BPMs in the Draft RMP/EIS for a reference to the 17 Western States Veg EIS Best Management Practices for special status plants and can be found in the Standard Operating Procedure appendix B. of that document, which can be found here: http://www.blm.gov/style/medialib/blm/wo/Planning_and_Renewable_Resources/veis/dear_reader_letter.Par.5918.File.dat/AppendixB-HerbicideUseSOPs.pdf see page B-11 under the Threatened, Endangered, and Sensitive Species (especially the second bullet)
DR-MTDK-BL-13-0204-16	SS plants	Chapter 4, Page 224 Impacts from livestock grazing Many special status plants are broadleaved forbs. Forbs are often benefitted by cattle grazing that helps to reduce the dominance of grasses. In some cases removing grazing pressure could cause a decline of special status broadleaved forbs; this possibility should always be considered.	n	In response to your comment, the text in Ch. 4, Special Status Plants, Impacts from Livestock Grazing of the Proposed RMP and Final EIS has been revised to clarify the discussion of benefits to forbs from managed grazing. The basic impact conclusions presented in the Draft RMP/EIS have not changed.
DR-MTDK-BL-13-0204-17	ACEC	Chapter 4, Page 549 East Pryor ACEC The draft RMP states that Alternative D would designate 11,122 acres and that this is more than Alternative A, but under the Alternative A section, it states that the ACEC would be 29,550 acres. Clearly Alternative D designates less than Alternative A; i.e., Alternative D reduces the acreage of East Pryor ACEC by two-thirds.	N	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the B&PPNM RMP/EIS. The text has been corrected in Chapter 4 Alternative D. ACECs are proposed where special management attention is required to protect the important and relevant values in relationship to the BLM preferred alternative in the RMP. Should existing management be present (like a WSA) that protects the relevant and important values then ACEC designation is not necessary. As WSAs contain the most restrictive management, there is no need for an ACEC to overlap the WSA. The relevant and important values of the East Pryor ACEC are addressed through the management of the WSAs.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
DR-MTDK-BL-13-0204-18	ACEC	Three species of globally rare vascular plant species occur in the East Pryor Mountains area. Erigeron allocotus occurs only in the Pryor and Bighorn mountains; Shoshonea pulvinata is found only in the Pryor Mountains and the foothills of the Absaroka-Beartooth; and Physaria (=Lesquerella) lescicii is known only from the Pryor Mountains. Populations of all three species should be protected by ACEC designation. Although Wilderness Study Area (WSA) designation will preclude motorized vehicle use, it is not adequate to protect these plants from habitat degradation caused by livestock or wild horses and does not mandate periodic monitoring that should be conducted. In order to protect significant populations of these species we recommend that the East Pryor ACEC encompass at least the BLM land in the following sections: T8S R28E sections 20, 21, 28, 29, 30, 31, 32, 33 and T9S R28E sections 4,5,6,8,9,10,15,16,17,20,21, 22.	n	<p>Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the B&PPNM RMP/EIS</p> <p>ACECs are proposed where special management attention is required to protect the important and relevant values in relationship to management in the BLM preferred alternative in the RMP. Should existing management be present (like a WSA) that protects the relevant and important values then ACEC designation is not necessary. Language is included in the RMP that should congress (ever) make a decision on wilderness in the Pryors, and this area not be designated wilderness, then it would be managed as an ACEC.</p> <p>As WSAs contain the most restrictive management, there is no need for an ACEC to overlap the WSA. The relevant and important values of the East Pryor ACEC are addressed through the management of the WSAs. Please also refer to comment in the ACEC section.</p> <p>Please refer to Appendix E. Areas Of Critical Environmental Concern in the Draft RMP/EIS for a discussion of ACEC Nominations for East Pryor ACEC (BLM nomination), Pryor Foothills Research Natural Area/ACEC (public nomination), and Sykes Ridge Rare Plant ACEC (nomination by Peter Lesica).</p>
DR-MTDK-BL-13-0204-19	ACEC	Chapter 4, Page 562, Pryor Foothills ACEC A Montana Natural Heritage report describes several plant communities from the Pryor Mtns. that are considered globally rare as well as rare in Montana. Many of these occur in the Gyp Springs area. These communities are just as important for conservation as the special status species. Recognizing and doing protective management for these communities is a "coarse-filter" approach to conserving biological diversity. We believe that the ACEC boundaries should be extended west to include Section 30 which has large outcrops of Chugwater sandstone which is associated with the Atriplex nuttallii Artemisia spinescens community as well as populations of Leptodactylon caespitosum and Mentzelia pumila. It would also be good to include at least a portion of Section 31 which has extensive stands of Artemisia pedatifida-dominated communities which are rare in Montana. Soils in this area are very highly erodible, and soils on many of the slopes are protected from erosion by fragile communities of lichens and mosses.	n	<p>Thank you for your comment.</p> <p>Please refer to Appendix E. Areas Of Critical Environmental Concern in the Draft RMP/EIS for a discussion of ACEC Nominations for East Pryor ACEC (BLM nomination), Pryor Foothills Research Natural Area/ACEC (public nomination), and Sykes Ridge Rare Plant ACEC (nomination by Peter Lesica).</p>
DR-MTDK-BL-13-0204-2	Veg-Rangelands , Fire	Chapter 2, Page 59, Rangelands Two studies by the Montana Natural Heritage Program indicate that Wyoming big sagebrush recovers very slowly after fire. Prescribed fire may not be a good way to restore habitat diversity in sagebrush stands.	n	<p>Please refer to Chapter 2, Page 59, Management Common to All Alternatives in the Draft RMP/EIS that states: Within sage grouse PHMAs only treatments that conserve, enhance, or restore Greater Sage-grouse habitat would be allowed. Site specific NEPA will address implementation practices (prescribed</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
				fire/mechanical treatment/chemical treatment) adjacent to and within sagebrush communities. It is well known and documented that Wyoming big sagebrush is slow to recover, however prescribed fire is a valuable, and economic land management tool that needs to be available to land managers. While it may not be applicable in every situation, all of the time, it still needs to be available. Please note that it is stated in the desired outcomes section on page 2-59, "Manage vegetation resources ... based on sound biological principles and the best available science." Therefore during site specific NEPA analysis if current literature indicates that prescribed fire will not achieve the desired goals and objectives for the project area, it will not be implemented.
DR-MTDK-BL-13-0204-20	NEPA	Oil and gas exploration could be disastrous to the fragile soils and vegetation in this area.	N	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the B&PPNM RMP/EIS.
DR-MTDK-BL-13-0204-3	Vegetation Invasive Species and Noxious Weeds	Chapter 2, Page 60 Rangelands BLM manages a great deal of rangeland that has been converted to crested wheatgrass. Some of these stands have been significantly invaded by native species while others have maintained their monoculture character. It would be good if restoration was prioritized to concentrate on those areas that are near mono cultures of crested	n	thank you for your comment. Page 2-60 BLM identifies various amounts of crested wheatgrass that would be treated over the life of the plan, as well as priorities for treating. In alternatives B, C, and D priorities would be: 1) located in PHMA, RA, or general sage grouse habitat. 2) Areas not currently being used in a grazing system to defer native rangelands. The intent of these treatments in Alternatives B, C, and D is to convert crested wheatgrass to native sagebrush/grassland. Therefore in these areas near monocultures would be priority treatment areas compared to crested/native areas.
DR-MTDK-BL-13-0204-4	Vegetation Invasive Species and Noxious Weeds	Chapter 2, Page 62 Invasive species Early detection and control is key to managing invasive species (see Invasive Plant Science and Management (2013) 6: 48-59 and references therein).	n	Thank you for your comment. Please refer to Chapter 2, Table 2-6.1 Page 2-62, pre-amble Section "Vegetation: Invasive Species and Noxious Weeds" discussion in the Draft RMP/EIS: "...by implementing a comprehensive weed program including: coordination with key partners, prevention and early detection, education, inventory and monitoring, and using the principles of Integrated Pest Management (IPM) and creating weed management areas (WMAs)".
DR-MTDK-BL-13-0204-5	WILD HORSES, PMWHR	Chapter 2, Page 83 Wild Horses There is no mention of wild horse impacts on special status plants and yet some special status plants occur on the wild horse range. Areas of potential conflict between horses and special status plants should be given priority for monitoring. There is a 1995 report done by Lesica and the Montana Natural Heritage Program that outlines the possible threats to <i>Lesquerella lesicii</i> .	N	Thank you for your comment. This table is for alternatives of wild horse management not impact analysis. Please see chapter four for impact analysis.
DR-MTDK-BL-13-0204-6	SS Plants	Chapter 2, Page 153 Grove Creek ACEC Herbicide application should only be by hand, not by boom or aerial in order to protect special status plants. Chapter 2, Page 155 Meeteetse Spires (also Appendix E-22) There may be some historic value to this ACEC. Wasn't this an important trail for early settlers and maybe	N	Thank you for your comments. Text in chapter 2 – vegetation – noxious and invasive species will be clarified to reflect your concerns. Please also refer to comment in the

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		even Native Americans? Herbicide application should only be by hand, not by boom or aerial in order to protect special status plants. Chapter 2, Page 160, Pryor Foothills ACEC This area has very low precipitation. Consequently the vegetation can easily be degraded by livestock grazing. Herbicide application should only be by hand, not by boom or aerial in order to protect special status plants.		ACEC section. Please refer to Appendix B. BPMs in the Draft RMP/EIS for a reference to the 17 Western States Veg EIS Best Management Practices for special status plants and can be found in the Standard Operating Procedure appendix B. of that document, which can be found here: http://www.blm.gov/style/medialib/blm/wo/Planning_and_Renewable_Resources/veis/dear_reader_letter.Par.5918.File.dat/AppendixB-HerbicideUseSOPs.pdf see page B-11 under the Threatened, Endangered, and Sensitive Species (especially the second bullet)
DR-MTDK-BL-13-0204-8	Veg-Rangelands	Chapter 3, Page 40 Crested wheatgrass should be mentioned in Table 3-12.	n	Thank you for your comment. Please see that in table 3-12 in the rangelands cover type under characteristic species, wheatgrass is listed this included crested wheatgrass.
DR-MTDK-BL-13-0208-1	Vegetation Invasive Species and Noxious Weeds, Travel mngt	the increased motorized use of the Pryors, along with cattle grazing, has introduced numerous species of noxious weeds and troublesome weeds to this isolated and special mountain range.	n	Noxious and invasive weed species can be introduced and spread by many vectors. With regard to prevention, early detection, education, inventory and monitoring, please refer to Chapter 2, Table 2-6.1, Page 2-62, pre-amble section "Vegetation: Invasive Species and Noxious Weeds" and "Desired Outcomes (Goals and Objectives)" discussions in the Draft RMP/EIS: "The BLM would control invasive, and non-native weed species and prevent the introduction of new invasive species, including aquatic nuisance species, by implementing a comprehensive weed program including: coordination with key partners, prevention and early detection, education, inventory and monitoring, and using the principles of Integrated Pest Management (IPM) and creating weed management areas (WMAs)". Thank you for your comment. The BLM Travel and Transportation Manual, Manual 1626, which recently came out, instructs the BIFO to establish and long-term, sustainable, multi-modal transportation system of roads, primitive roads, and trails. It is an interdisciplinary approach to travel and transportation planning and management that addresses resource uses and associated access to public lands and which encompasses motorized, non-motorized, mechanical and animal powered modes of travel. The final RMP has been modified to incorporate this new Manual. In regards to your concern on the spread of invasive vegetation, and your concern regarding grazing is addressed (Please note that the goal for the Pryor Mtn TMA is to protect wilderness values, cultural assets, visual characteristics, sensitive plants, fragile and erosive soils, wild horses and wild horse habitat.)
DR-MTDK-BL-13-0208-2	Livestock Grazing	Please include in your livestock grazing plans that it is the responsibility of the rancher who has an allotment to spray for weeds at the round-up and feedlot locations such as those along the Gyp Springs and Helt Roads. It is clear that it	n	Thank you for your comment. The subject of this comment is beyond the scope of the Billings and Pompeys Pillar National Monument RMP/EIS and does not require further agency response. Specific Grazing permit terms and conditions

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		is livestock that are dispersing weeds including annuals like cheat grass that are dismissed as unimportant.		require a site specific analysis, rather than a RMP level analysis.
DR-MTDK-BL-13-0209-1	Recreation	There is no reason why target shooting should be allowed in the PMWHR, and many good reasons why it should not be allowed. Not only does target shooting endanger the horses and other wildlife on the range, but it also presents a clear and present danger to members of the public.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS. Please note that on page 2-172 safety is noted as a specific concern and that the closure is only during the period of peak visitation and only in the area where people and horses congregate in close proximity with a potential for both vegetation and topography screening.
DR-MTDK-BL-13-0209-2	Recreation	the Pryor Mountain Herd is especially famous and as such, people come from around the country and indeed the world to observe these horses. Other tourists are drawn to the area because of its natural beauty. All these people provide significant benefits to the local economy through the purchase of meals, lodging and other amenities, but target shooting endangers them and makes them less likely to visit the area. This in turn would hurt the local economy. There are plenty of other places where individuals can engage in target shooting without allowing the practice within the PMWHR.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS. Please note that on page 2-172 safety is noted as a specific concern and that the closure is only during the period of peak visitation and only in the area where people and horses congregate in close proximity with a potential for both vegetation and topography screening.
DR-MTDK-BL-13-0209-3	WILD HORSES, PMWHR	any enclosures not in use should be removed as a matter of priority. Many enclosures (in particular the large ones on Sykes Ridge) are not being used for data collection, are a safety hazard to foals and other vulnerable animals, and generally undermine the goal of achieving and maintaining a Thriving Natural Ecological Balance within the PMWHR.	N	Thank you for your comment
DR-MTDK-BL-13-0209-4	PMWHR, Travel Mngt	I do not support the preferred alternative of closing part of Burnt Timber and Sykes Ridge Roads from April 15 - June 15. This area is very popular with tourists, who provide important economic stimulus to the area, and the dual goals of protecting both the ecological integrity of the area and the safety of the horses can be achieved through cost-effective public education measures. For example, the BLM should utilize aesthetically appropriate signage and use other public education tools to discourage the public from going off-road and to make clear penalties for going off-road, and volunteers can help in this effort by creating natural blocks to keep the public from going off-road in these areas.	N	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS. In regards to your comment on closing Burnt Timber and Sykes Ridge Road from April 15 to June 15, the decision was made to protect a number of resource values, not just wild horses. The final decision has been made to leave the Burnt Timber road closed during this time period while allowing access up Sykes Ridge Road.
DR-MTDK-BL-13-0216-1	WILD HORSES, PMWHR	According to NAS, wild horse roundups aren't necessary! No more roundups! There is plenty of room for the existing wild horses and then some in the Pryor Mountains! Remove the fences! Thank you!	N	Thank you for your comment. This document is not tied to any gather as gathers are implementation level documents.
DR-	ACEC	Of lower priority would be any documents used to justify proposing only 2,606	n	Thank you for your comment. Please see the 1998 ACEC Assessment and

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
MTDK-BL-13-0222-1		acres of the Pryor Foothills as a Research Natural Area/ACEC on 30 September 2009. The Nomination Evaluation is found in the Draft RMP in Appendix E on page E-28. Specifically why were the recommendations of Peter Lesica and Peter Achuff in Distribution of Vascular Plant Species of Special Concern and Limited Distribution in the Pryor Mountain Desert, Carbon County, Montana, January 1992 rejected		Proposed amendment to the Billings, Powder River and South Dakota RMPs here: http://www.blm.gov/style/medialib/blm/mt/blm_programs/planning/billings_rmp/amendments.Par.94086.File.dat/acecEA.pdf pages 74-76 are the nominations evaluations for the Billings RMP and page 103 shows the map of the nominated vs. recommended ACEC.
DR-MTDK-BL-13-0223-3	ACEC	Based on a survey of plants on the south side of the Pryors done in May and June of 1991, Peter Lesica and Peter L. Achuff recommended the Township T9S, R27E and the western half of Township T9S, R28E as a reserve for protection of eight of the 15 high-priority species of plants they found in the Pryor Mountain Desert. Their report was presented to Don Heinze in January 1992. hey recommended 34,560 acres be designated in some manner to protect the rare plants in the Pryor Mountain Desert. The number of acres proposed for Pryor Foothills ACEC or RNA falls far short of the Lesica - Achuf recommendation. It appears that the Gypsum Creek drainage is not being considered. Why?	n	Thank you for your comment. In response to your comment Please refer to Appendix E. Areas Of Critical Environmental Concern in the Draft RMP/EIS for a discussion of ACEC Nominations for East Pryor ACEC (BLM nomination), Pryor Foothills Research Natural Area/ACEC (public nomination), and Sykes Ridge Rare Plant ACEC (nomination by Peter Lesica). Please see the 1998 ACEC Assessment and Proposed amendment to the Billings, Powder River and South Dakota RMPs here: http://www.blm.gov/style/medialib/blm/mt/blm_programs/planning/billings_rmp/amendments.Par.94086.File.dat/acecEA.pdf pages 74-76 are the nominations evaluations for the Billings RMP and page 103 shows the map of the nominated vs. recommended ACEC.
DR-MTDK-BL-13-0226-1	ACEC	Combine all lands proposed for special designation that are west of Crooked Creek into one ACEC.I do not understand why BiFO would fragment the lands west of Crooked Creek by applying different administrative designations. Common sense would dictate one administrative designation with one set of managerial policies. As BLM makes decisions about conservation designations consider keeping lands on the west side of Crooked Creek in one designation and separate from the designations on the east side. As an example, it is illogical for the Demijohn Flat to be in the Burnt Timber Canyon ACEC. Those sections of land with various designations lie within T9S R27E. I propose that BiFO combine the Burnt Timber Canyon WSA west of Crooked Creek; all or part of sections 4, 3, 9, 10, 14, 15 that lie to the west of Crooked Creek Road; the Penney Peak Strip which is section 22 and parts of sections 21 and 23; and Alternative D proposed Pryor Foothills RNA/ACEC, which is basically sections 29, 28, 32 and 33.I do not understand why the southwest corner of section 15 was excluded from the Alternative D East Pryor ACEC. It should be included.	N	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the B&PPNM RMP/EIS Demi-John Flat national register district is partly included within the Burnt Timber Canyon WSA. When expanding the boundaries of the East Pryor ACEC, the ACEC boundary was expanded to include the entire national register district.
DR-MTDK-BL-13-0226-2	ACEC	The Penney Peak strip Incorporate the Penney Peak Strip into an ACEC to provide the protection this strip of land requires. The Penney Peak Strip is in T9S R27E, and includes all of section 22 in which Penney Peak is located together with the portions of sections 21 and 23 from the Crooked Creek Road on the west, to Tillet's land on the east. This strip consists of very fragile land. Various geological strata are exposed. Some of the South Pryor Desert plants are in this strip. It has a its own special beauty.	N	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the B&PPNM RMP/EIS.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
DR-MTDK-BL-13-0226-3	ACEC	<p>I present four alternatives beginning with Alternative W, which is my preferred alternative, ranked down to Alternative Z, which is a poor compromise. Please, consider each of these alternatives as a comment for response. Alternative Designate all BLM lands on the southern slopes of the Pryor Mountains between the Forest Service lands to the north and the Wyoming border to the south and from the road that comes out of Bear Canyon and joins Highway 310 north of Frannie on the west to Crooked Creek on the east. This would be West Side, South Pryors Desert. It is difficult to set the northern boundary for my Alternative W. My focus is upon the conservation of the desert areas. How can one easily establish where the desert lands end and the uplands begin? It would be simpler to set the northern boundary at the Forest Service boundary. This would be West Side, South Pryors BLM. This area, if managed as an ACEC, would give the most protection to the wide range of plants, plant communities and geological formations. The Montana Native Plant Society incorporates this area within its South Pryor Mountains Important Plant Area. This is the place where Montana botanists believe efforts should be made to conserve plants. Alternative X Designate the area recommended by Peter Lesica and Peter Achuff in 1992 as an ACEC. They recommended 34,560 acres be designated in some manner to protect the rare plants in the Pryor Mountain Desert. I cannot say it better than Lesica and Achuff's statement on page 35 of their report. "The Gypsum Creek - Crooked Creek area (T9S R27E and the western half T9S R28E) stands out as having the highest concentration of high-priority species populations. Eight of the 15 high-priority species: <i>Astragalus geyeri</i>, <i>Astragalus oregonus</i>, <i>Camissonia andia</i>, <i>Cleome lutea</i>, <i>Grayia spinosa</i>, <i>Leptodactylon caespitosum</i>, <i>Malacothrix torreyi</i> and <i>Mentzlia pumila</i>, have known populations in this area. The Gypsum Creek - Crooked Creek area is 4100 - 5200 ft in elevation and contains soils derived from calcareous sandstone, Chugwater sandstone and limestone. Terrain varies from highly dissected foothills with deep canyons to broad alluvial valleys. The appreciable habitat diversity and the large number of populations of both high - and low - priority species make the Gypsum Creek - Crooked Creek area the best choice for a single reserve in the Pryor Mountain Desert. The seven high - priority species not represented in this area occur in widely separated sites throughout the study area and cannot be protected practically in large reserves. In addition to the many species of rare plants found in the Pryor Mountain Desert, we believe that many of the plant communities are rare in Montana, and some may be globally unique." Lesica, Achuff 1992. Note that this statement predates DeVelice and Lesica's 1993 study which delineated those plant communities in the Pryor Mountain Desert, a report to which you should refer. It is important that in designating an ACEC that BLM focus not only on BLM's plant species of concern - but also consider the plant communities. Designating the one and one-half townships as recommended would also</p>	N	<p>Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the B&PPNM RMP/EIS.</p>

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		<p>conserve those unique plant communities and other natural features. Alternative Expand the Alternative D for the proposed Pryor Foothills RNA/ACEC to include these uncommon plant communities. Consider each of these four areas separate recommendations or combined as one recommendation. A.) McKown well T9S R26E, sections E half 27, 26, 34I have not yet walked this area. It does include the exposure of the Kootenai stratum that is poorly represented elsewhere in the South Pryors. b.) Artemisia pedatifida/Agropyron spicata and Artemisia pedatifida/Atriplex gardneri plant communities Section 23, T9S R26E These are important plant associations in the South Pryor Desert that have not been given any conservation status. c.) Atriplex gardneri/Monolepis nuttalliana Section 30, T9S R26E (This plant community is also in the adjacent sections 32, T9S R26E and 24 in T9S R25E.)I have not yet walked this area. Petroglyph Canyon is in section 35, T9S R26E. BiFO has set aside 240 acres to preserve this archeological site, but has not divulged the boundaries. Section 35, T9S R26E is also interesting for its plant associations. An all inclusive option for Alternative Y would be to expand the proposed Alternative D for the Pryor Foothills RNA/ACEC to include the following sections: In T9S R26E include sections 23,24, 27, 26, 25, 34, and 35 (36 is State land) and in T9S R27E include sections 30 and 31. BLM has proposed Sections 29, 28, 32, and 33 for the Pryor Foothills RNA/ACEC. Alternative Z If BiFO rejects the above Alternatives W, X and Y, at least adjust the west boundary of the RNA/ACEC to the west line of sections 29. It would then be reasonable that the west line of section 32 would also be the border. The western boundary that BiFO proposes for the RNA/ACEC in the draft RMP appears to be an old roadbed parallel to and west of the Gypsum Creek Drainage. It runs up the middle of a broad valley. The former road is now a faint pathway that is no longer drivable. Extending the boundary to the west side of Sections 29 would then include the more of the valley and some of the ridge of Chugwater to the west. In Section 32 the proposed west boundary for the Alternative D Pryor Foothills RNA/ACEC appears to be arbitrary and makes no sense. As proposed it is simply a line drawn south from the junction of the former road with the junction of the Gypsum Spring Road. Under the travel plan I will propose that BLM designate the old, now undrivable, road parallel to the Gypsum Creek Drainage be designated as a hiking trail from the Gypsum Spring Road to the watering tank</p>		
DR-MTDK-BL-13-0229-1	NEPA	<p>The CEQ has directed agencies to gather data from reliable sources such as interviews and information from local residents which the BLM has failed to do. You did hold the open meetings, but refused to allow public comment at those meetings. How can they be considered public meetings if no public discussions are allowed? I suggest you re-schedule the meetings and allow them to be public meetings as required. I request your agency follow the CEQ requirement and gather more reliable information in completing the BLM RMP/EIS. Failure to</p>	N	<p>Thank you for your comment.</p> <p>The BLM Billings Field Office held 5 Open House style meetings to answer questions about the draft RMP/EIS and the public comment period on the draft RMP/EIS was open for 90 days. Also, at the request of members of the public, the BLM attended a meeting on June 22, 2013 in Belfry, Montana to answer questions regarding proposed management in the Grove Creek area.</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		gather true data on the economic impacts of this decision and to incorporate this information into the document would result in the decision being arbitrary and capricious.		
DR-MTDK-BL-13-0232-1	WILD HORSES, PMWHR	Round ups and holding pens for Mustangs is not a sustainable solution for the range/public lands. What is sustainable is to remove the cattle/sheep from the range and return the natural predators that will thin the herds and end the need for land management.	N	Thank you for your comment. The PMWHR has not had active livestock grazing since 1968 on the Secretarial Order and 1975 on the higher elevations when this area was added to the range.
DR-MTDK-BL-13-0233-1	WILD HORSES, PMWHR	I am also writing to encourage you to consider:1) Prioritizing the removal of any enclosures not in use. The large ones on Sykes Ridge area a potential to be a safety hazard to small foals, which we have seen in years past with other enclosures.2) Encourage BLM, to work with the National Park Service to reintroduce the Sorenson Extension into the horse range.	N	Thank you for your comment
DR-MTDK-BL-13-0234-1	Travel mngt	The Demijohn Flat route should be designated non-motorized. Please specify in your RMP the non-motorized routes. They deserve as much recognition as the motorized routes. But thank you for clarifying that motor vehicle use is limited to designated routes.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS In regards to the Demi John Flat route, the RMP has a range of possible decisions. In this case, due to the conditions you mentioned the Alternative D has been modified to reflect the current conditions. The route will be designated as "closed to motorized vehicles" except for administrative purposes. This will not prohibit non-motorized use. Refer to map 146
DR-MTDK-BL-13-0237-1	Edits	ES-2 Special Designations Please add National Trails System Act (P.L. 90-543, as amended through P.L. 111-11, March 30, 2009) (also found in the United States Code Volume 16, Sections 121-1251) especially the following section to set the tone: The following portion of the law directions our management for these two trails: SEC. 7. (16USC1246) (c) National scenic or historic trails may contain campsites, shelters, and related public-use facilities. Other uses along the trail, which will not substantially interfere with the nature and purposes of the trail, may be permitted by the Secretary changed with the administration of the trails. Reasonable efforts shall be made to avoid activities incompatible with the purposes for which such trails were established" "Where a national historic trail follows existing public roads, developed rights-of-way or waterways, and similar features of man's non-historically related development, approximating the original location of a historic route, such segments may be marked to facilitate retracement of the historic route, and where a national historic trail parallels an existing public road, such road may be marked to commemorate the historic route. Other uses along the historic trails and the Continental Divide National Scenic Trail, which will not substantially interfere with the nature and purposes of	n	Thank you for your comment. Text has been edited in response to your comment.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		the trail, and which, at the time of designation, are allowed by administrative regulations, including the use of motorized vehicles, shall be permitted by the Secretary charged with administration		
DR-MTDK-BL-13-0237-10	National Historic Trails	2-175 National Historic Trails and then throughout the document Add a standard: Manage the Auto Tours associated with the National Trails to include interpretive sites and turn outs along with designated markers as set out in the NHT's comprehensive management plans. Add a to Management Common to All Alternatives, 1st standard: Implement the Interagency National Historic Trail Plans and all revisions including sub plans such has interpretive plans Add to Management Common to All Alternatives, 2nd standard: and solar ROW actions Add to Management Common to All Alternatives, 3rd standard: And participate and follow Trail's Land Acquisition Management Plans or create a standard for this Add a Standard: In areas that may affect the NPNHT, consultation will be undertaken with the 3 affected tribes: Nez Perce, Confederated Tribes of the Umatilla Reservation, and Confederated Tribes of the Colville Reservation	n	Thank you very much for comment. The RMP text has been altered to reflect your comment and concerns
DR-MTDK-BL-13-0237-11	National Historic Trails	3-116 3.10.1.5 Historic Period Please add: In 1877, 5 bands of Nez Perce fleeing the U.S. Army passed through this area during September followed by several elements of the U.S. Calvary	n	Thank you for your comment. In response to your comment, the text in chapter 3 section 3.10.1.5 will be revised.
DR-MTDK-BL-13-0237-12	National Historic Trails	3-122 3.19.6.2 Tribal Consultation Need to add a sentence indicating that in areas near the Nez Perce (Nee-Me-Poo) National Historic Trail (NPNHT), the NPNHT Auto Tours and potential NPNHT associated sites tribal consultation must occur with the three tribes associated with the Nez Perce; Nez Perce, Confederated Tribes of the Umatilla Indian Reservation and the Confederated Tribes of the Colville Indian Reservation	n	Thank you for your comment. The text in section 3.19.6.2 will be revised to reflect your concern.
DR-MTDK-BL-13-0237-13	National Historic Trails	3-190 3.21.2 Sundance Lodge Recreation Area SRMA This area is also close to or is where the some or all of the Nez Perce crossed during the 1877 Flights and they were followed by elements of the U.S. Army crossing behind them	n	The RMP text will be modified to reflect this information. Please see "text changes.
DR-MTDK-BL-13-0237-14	National Historic Trails	3-196 3.22 Trails and Travel Management Please add the following standard: The NPNHT (and Lewis & Clark NHT) is a non-motorized trail by Congressional designation except for auto tours, crossing, etc	n	Thank you for your comments and your concern. We appreciate the interest in management of public lands. The sections of the RMP have been altered to include the statement.
DR-MTDK-BL-13-0237-15	National Historic Trails	3-196 or 3-205 3.22 Trails and Travel Management or 3.24 Transportation and Facilities There is no acknowledgement or discussion of the Nez Perce National Historic Trail Auto Tours that pass through the District. Please add a discussion of the Auto Tours including the Highway route and Adventurous routes. More information can be found at http://www.fs.usda.gov/detail/npnht/home/?cid=FSBDEV3_055663	n	Thank you for your comment. The text in the RMP has been altered to reflect your concerns.
DR-MTDK-BL-	National Historic	3-224 3.31 National Historic Trails Please add: The National Historic Trails are managed according to guidelines set up in their Comprehensive Management	n	Thank you very much for comment. The RMP text has been altered to reflect your comment and concerns

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13-0237-16	Trails	Plans. The plan for Nez Perce National Historic Trail is found in the The Nez Perce (Nee-Me-Poo) National Historic Trail Comprehensive Plan, Forest Service, Northern Region, 1990 which is undergoing a plan revision at this time		
DR-MTDK-BL-13-0237-17	National Historic Trails	Chapter 4 General Observation Not all resource areas list impacts to Special Designations topics in the same format. Some sections include some special designations like National Historic Trails or Wilderness and some resource sections do not. It would be helpful to have a statement in the front of the resource sections indicating what special designations topics are impacted by the resource and which special designations topics have no impacts and why. This would help the reader when they are looking for specific topics	n	Thank you for your comment. Text has been edited in response to your comment.
DR-MTDK-BL-13-0237-18	National Historic Trails	4-581 4.4.6 National Historic Trails 1st paragraph, there is a reference to Map 175 that shows the National Historic Trails, I cannot find Map 175 in my 4 volumes for the RMP/EIS	n	Thank you for your comment. Text has been edited in response to your comment.
DR-MTDK-BL-13-0237-19	National Historic Trails	4-582 4.4.6.1 Method and Assumptions 1st sentence add the word Comprehensive between Trail and Plans There is no discussion of the Auto Tours in this section, please add a section on the Auto Tours	n	Thank you very much for comment. The RMP text has been altered to reflect your comment and concerns
DR-MTDK-BL-13-0237-2	National Historic Trails	1-151.4.1.4 Issues Addressed Through Policy or Administrative Actions First bullet, please add National Trails System Act to the list of laws and add it into the glossary of terms too	n	Thank you for your comment. Text has been edited in response to your comment.
DR-MTDK-BL-13-0237-3	National Historic Trails	1-261.6.1 Consultation with American Indian Tribes Please add the following sentence: In areas that may affect the Nez Perce National Historic Trails, high potential sites, high potential segments, and the Auto Tours consultation will be undertaken with the 3 affected tribes: Nez Perce, Confederated Tribes of the Umatilla Reservation, and Confederated Tribes of the Colville Reservation	n	Thank you for your comment. The text in section 1.6.1 indicates those tribes invited to become cooperating agencies in 2008.
DR-MTDK-BL-13-0237-4	National Historic Trails, Oil and Gas	2-39 2.6.2.1 Leasable Fluid Minerals, Management Common to All Alternatives, Oil and Gas 1st paragraph, add National Trails System Act to discussion of applicable laws	n	Thank you for your comment. Text has been edited in response to your comment.
DR-MTDK-BL-13-0237-5	National Historic Trails, cultural	2-85 Cultural and Heritage Resource-Management Common to All Alternative Add a standard or acknowledgement for the following: The NPNHT is a congressionally designated historic trail and the potential for a national historic register status is possible. There is a need for a historic preservation protection plan for the corridor, designated high potential historic sites: Bill Brockway Ranch? P.W. McAadow Sawmill? J.M.V. Cochran Ranch? Canyon Creek Battle Site? Crow Indian Raid? Musselshell Crossing? Sturgis and Howard Camps And associated side trail- Bozeman Trail Road that are cited in The Nez Perce (Nee-Me-Poo) National Historic Trail Comprehensive Plan, Forest Service, Northern Region, 1990, page 26. The CMP revision will require the historic preservation plan	n	Thank you for your comment. The BLM can only make management decisions for those resources located on BLM managed public lands. The designated high potential historic sites mentioned in the comment are not located on BLM managed public lands managed by the Billings Field Office. As the segments of the NPNHT within BiFO (on BLM managed public land) have not been located on the ground or inventoried for cultural resources, no National Register nomination can occur. When the segments are located and inventoried for cultural resources, a national register nomination would occur.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
				Please refer to table 2-6.3 National Historic Trails.
DR-MTDK-BL-13-0237-6	National Historic Trails, cultural	2-88 Table 2.6.1 Cultural Resources Use Allocation, Historic Roads/Trails and then throughout document in the cultural resource sections Include interpretation under all alternatives for National Historic Trails to meet the intent of the Act Sec 7. (c) ". The appropriate Secretary may also provide for trail interpretation sites, which shall be located at historic sites along the route of any national scenic or national historic trail, in order to present information to the public about the trail, at the lowest possible cost, with emphasis on the portion of the trail passing through the State in which the site is located. Wherever possible, the sites shall be maintained by a State agency under a cooperative agreement between the appropriate Secretary and the State agency	n	Thank you for your comment. Text has been revised in table 2-6.3 National Historic Trails. There are five historic trails and two NHT within BiFO. The management in table 2—6.1 refers to historic trails. Management of NHTs is located in table 2-6.3.
DR-MTDK-BL-13-0237-7	National Historic Trails, visual	2-91 Table 2.6.1, Visual Resources and then throughout the document The goal of a national historic trail is to protect the cultural, historic landscape in a condition that is duplicates the time period for which the trail was designated. Please classify the Nez Perce National Historic Trail (NPNHT) has a Visual Resource Management Class I or II throughout this document	n	Thank you for your comment. Please see table 2.12 Special Designations-NHT for VRM designations.
DR-MTDK-BL-13-0237-8	National Historic Trails	2-109 Realty, Cadastral Survey, and Lands: Land Tenure Adjustment and Access- Management Common to All Alternatives and then throughout the document Add a standard: Participate and adopt National Historic Trails Land Acquisition Plans	n	Thank you very much for comment. The RMP text has been altered to reflect your comment and concerns
DR-MTDK-BL-13-0237-9	National Historic Trails, Travel mnngt	2-127 Trails and Travel Management -" Management Common to All Alternatives and then throughout the document Please add the following standard: The NPNHT (and Lewis& Clark NHT) is a non-motorized trail by Congressional designation except for auto tours, crossing, and approve motorized use dating prior to the enacting legislation	n	Thank you very much for comment. The RMP text has been altered to reflect your comment and concerns
DR-MTDK-BL-13-0245-2	Wildlife, Oil and Gas	COMMENT: As shown in Table 2 above, the planning prescriptions for surface occupancy and controlled surface use for the three planning areas (MCFO, HiLine, and Billings/Pompey's Pillar) are variable which raises questions of how NSO restrictions were determined. Based on review of the three draft planning documents, it appears that all three relied on same data sources to address impacts of oil and gas development on sage-grouse. All planning areas have similar sage-grouse habitat conditions (i.e., all are in Sage-Grouse Management Zone 1), and all are anticipating some level of oil and gas development. It is unclear how different NSO restrictions around leks were developed. NSO restrictions around leks vary among the planning areas, with buffers around leks being 0.6, 1, 2, and 3 miles. Why are these NSO restrictions different for the three planning areas when they all relied on similar sources to define potential impacts associated with oil and gas development? Does sage-grouse vulnerability to impact or population viability differ among BLM planning areas?	Y	Thank you for your comment. The BLM oil and gas stipulations are currently undergoing a consistency review between the field offices with RMP revisions underway. Any inconsistencies will be corrected.
DR-	WILD	On page 2-83, Wild Horses, FWP opposes any expansion of the Wild Horse	N	Thank you for your comment

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
MTDK-BL-13-0246-10	HORSES, PMWHR	Range. Expansions proposed in either Alternative C or D would allow for increased horse use on important mule deer winter ranges.		
DR-MTDK-BL-13-0246-11	Fire Ecology and Mngt	On page 2-94, Fire Ecology and Management -" Management Actions by Alternative, FWP supports Alternative B whence prescribed fire would not be allowed in the greater sage grouse habitat ACECs, PPAs, or RAs. Alternatives C and D both allow prescribed fire in the sage grouse PPAs and RAs in the attempt to achieve age class diversity of the sagebrush. It has been shown repeatedly that big sagebrush does not come back quickly from fire and does not need to be manipulated to maintain age class diversity.	n	Thank you for your comment. Your comment will be considered by the Billings Field Office when selecting an alternative.
DR-MTDK-BL-13-0246-12	Livestock Grazing	On page 2-116, Livestock Grazing -" Management Common to Action Alternatives - All allotments wholly located within sage-grouse PPA habitat would be considered for retirement where the base property owner relinquished their preference. FWP questions the value of retiring allotments to improve sage grouse habitat. It has been shown that grazing as a management tool can improve plant vigor and diversity, and that long-term undisturbed grass stands may become degraded and undesirable for nesting and brood rearing birds. However, poorly managed grazing can be detrimental to sage grouse. FWP prefers to see these allotments placed under a true Hormay rest-rotation grazing system that provides for grazing schematics based on the physiological needs of the vegetation, which includes a post-season grazing treatment, followed by a complete years of rest, followed by a traditional grazing treatment.	n	Thank you for your comment. Based on historical grazing administration in the Billings Field Office, grazing preference is rarely relinquished. Under Alternatives B, C, and D the BLM would consider retirement of these allotments. If current livestock use is compatible with sage grouse habitat requirements, and rangeland health standards are being achieved, BLM would have little basis to retire the allotment from grazing. Additionally, on Page 2-116 under management common to all alternatives, it is stated BLM would "use livestock grazing to enhance ecosystem health, wildlife habitat, Where supported by site-specific environmental analysis." This may or may not include the use of a rest rotation grazing system
DR-MTDK-BL-13-0246-13	Livestock Grazing	Livestock Grazing Beginning on page 3-180, FWP offers the following general commentary: The only commitment to wildlife in the livestock grazing section is meeting Montana/Dakota's Standards for Rangelands Health and Guidelines for Livestock Grazing Management. This standard is fairly generic and basically says that native plant communities will be maintained or improved. There appears to be no standards that are specifically directed toward improving sage grouse habitat. For example, there are no standards for maintaining adequate residual grasses on the landscape to enhance nesting success. While most other resource uses discussed in the RMP include specific requirements/stipulations for the enhancement of sage grouse habitat, the grazing section includes no similar requirements. FWP would like to see more emphasis on grazing management to improve wildlife habitat through Hormay rest-rotation or similar systems.	n	<p>The current standards for rangeland health (Appendix I) were approved by the Secretary of Interior on August 12, 1997 (pg. 3-181). Addition of new standards, or modification of existing standards would likely require a similar approval process and are not within the scope of an RMP level analysis.</p> <p>Additionally, Standard 5 (habitat) mandates "The environment contains all of the necessary components to support viable populations of a sensitive/threatened and endangered species in a given area relative to site potential." This standard captures your comments regarding the need to manage for residual grass cover to enhance nesting success.</p> <p>The RMP does address specific requirements and stipulations for sage grouse habitat on page 2-116. Under all alternatives the BLM would develop site specific greater sage-grouse habitat and management objectives within greater sage-grouse priority areas. These objectives would be incorporated into the respective allotment management plans or livestock grazing permits as appropriate. This would include such actions as maintaining residual grasses. Additionally see Appendix AA (section F) for more specific livestock grazing conservation and mitigation measures for sage grouse habitat.</p>

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				Also, the BLM is currently assessing habitat, utilizing the protocol outlined in the Habitat Assessment Framework, (Instruction Memorandum No. 2012-043.) This framework is also listed in appendix AA Through this effort BLM has been collecting habitat data from public land inPHMAs, and where available, BLM has requested MTFWP habitat data collected for the ongoing sage grouse study being conducted in Musselshell County. Data is compiled to assess the present habitat, with the seasonal habitat requirements of the sage grouse to ensure that the proper requirement and stipulations are placed on grazing authorizations at the allotment and/or pasture level during site specific analysis, rather than at the RMP level.
DR-MTDK-BL-13-0246-14	Wildlife	No mention is made of reducing/mitigating grizzly bear mortality that occurs on BLM allotments as a result of cattle depredations. The RMP should specify that allotment plans will be designed to minimize potential grizzly mortality. Failure to do so could trigger a grizzly status review and consultation with the US Fish, and Wildlife Service.	n	Refer to Table2-6.1., under Wildlife Habitat- Management Common to All Alternatives, the statement "Assist in the restoration, reintroduction, augmentation, or re-establishment of T & E, special status, and priority species and other populations" etc. This is a recent issue and outside of the Grizzly Bear Recovery Zone. The grizzly bear mortalities occurred in 2011 and 2012 which was unusual. No mortalities had occurred until then and no grizzly bear/livestock conflicts occurred on BLM lands, but on adjacent private lands. BLM is currently consulting with USFWS on a grazing permit renewal and is recommending (in consultation with USFWS) several mitigation measures to reduce grazing and grizzly bear conflicts. BLM will continue to consult with USFWS, Endangered Species Office.
DR-MTDK-BL-13-0246-15	Recreation	Target Shooting On page 2-126, Pryor Mountain Wild Horse Range and East Pryor ACEC, FWP questions the closure of over 6,700 acres for the entire summer as shown in Alternative D, the preferred Alternative. No public safety issues are used as reason for closure, and we wonder what are the resource concerns.	n	Please note that on page 2-172 safety is noted as a specific concern and that the closure is in effect only during the period of peak visitation and only in the area where people and horses congregate in close proximity with a potential for conflict due to both vegetation and topography screening.
DR-MTDK-BL-13-0246-16	Travel mngt	Travel Management On page 2-133, Pryor Mountain TMA, referring to map 146, FWP is not sure what the additional management designation means, but is opposed to any spring closure of the Burnt Timber Road and the Sykes Ridge Road, as this would preclude access for bear hunting to a significant portion of the Pryor Mountains.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS. In regards to your comment on closing Burnt Timber and Sykes Ridge Road from April 15 to June 15, the decision was made to protect a number of resource values, not just wild horses. The final decision has been made to leave the Burnt Timber road closed during this time period while allowing access up Sykes Ridge Road.
DR-MTDK-BL-13-0246-	Travel mngt	On page 2-132, Tin can Hill TMA, referring to map 134, FWP supports Alternative D, the preferred Alternative. This alternative provides reasonable motorized access while maintaining some secure areas for wildlife within the	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
17		TMA. This area is in close proximity to Big Timber and is a popular area for hunting and outdoor recreation. Motorized recreation opportunities on this type of land are extremely limited in the Big Timber area, and allowing moderate motorized access as proposed in Alternative D would be beneficial. Alternative D recommends a seasonal road closure but doesn't specify closure dates. Most road/resource damage occurs during the wet months of late winter and spring. From a resource perspective a closure during this time period would be most beneficial.		and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS. In regards to your specific comment regarding access to and within the Tin Can Hill property the RMP has a range of possible decisions. In this case, the decision to ensure adequate public access and protect the resources resulted in the determination that the current management direction was appropriate. The majority of the routes will remain closed to OHV use but available for non-motorized use.
DR-MTDK-BL-13-0246-18	Travel mgnt	On page 2-130, Horsethief TMA, it appears that in Alternatives B & D on maps 112 and 114, that the road running north off of Golf Course Road into the south side of Lake Mason NWR (T8N, R24E, Secs. 1 and T9N, R24E, Secs. 34 and 35) is proposed as for administrative use only. FWP believes this is a county road, and thus is open to public travel with no restrictions.	n	Thank you for your comments. The BLM has reviewed the information used in its earlier decision and found that the mentioned vehicle route (HT 1003) is indeed a county maintained road. The decision has been altered in the document to reflect this.
DR-MTDK-BL-13-0246-19	Travel mgnt	On page 2-129 -" 130, Gage Dome/Colony Road TMA, the road known as Iverson Road on Maps 108, 109, and 110 is proposed for a variety of options from open to administrative use only, depending on the Alternative. FWP believes this is a county road, and thus open to public travel with no restrictions. There are also two other roads on the Graves BMA (T10N, R25E, Sec. 6) and Gage Dome BMA (T1 1N, R26E, Secs. 32 and 33) that are proposed to change from open to administrative use only in the preferred Alternative D. FWP currently shows these as open for vehicular travel on the BMA maps, and we recommend that these remain as open roads to provide reasonable access on the BMA.	n	Thank you for your comment. BLM has no route identified as "Iverson Road" on its route inventory and cannot respond to this observation. (However, if the route in question is a county-maintained road then BLM will not designate it). In response to the comment regarding the routes in T. 11 N., R. 26E., Sections 32 and 33 – believed to be actually route GD 1005 - the RMP has a range of possible decisions and that a reasonable level of motorized access exists without the public use of this route.
DR-MTDK-BL-13-0246-2	Wildlife	On page 2-44, Sage Grouse -" All Sage Grouse Habitat, Alternative D, the preferred Alternative: the winter stipulation of a two mile buffer around leks is inadequate. FWP prefers Alternative B which uses the TL within four miles of a lek, but if that Alternative is not selected, FWP recommends an alternative with at least a three mile buffer. Research data shows that many female grouse may be located up to three miles from a lek during winter.	n	Thank you for your comment. Text will be changed in Table 2-5 to Reflect Tables in 2.6.1
DR-MTDK-BL-13-0246-20	Wildlife	Page 3-82, Grizzly Bears: Currently occupied grizzly bear range includes the public lands along the Beartooth Mountain foothills, especially the east and northeast face of the Beartooths. BLM allotments include seasonal home ranges of numerous grizzlies. Grizzlies have also been documented in the Meeteetse Spires area	n	Thank you for your comment. This information will be updated in the final. Map #21 will be updated. Refer to Table2-6.1, under Wildlife Habitat-Management Common to All Alternatives, the statement "Assist in the restoration, reintroduction, augmentation, or re-establishment of T & E, special status, and priority species and other populations" etc. This is a recent issue and outside of the Grizzly Bear Recovery Zone. The grizzly bear mortalities occurred in 2011 and 2012 which was unusual. No mortalities had occurred until then and no grizzly bear/livestock conflicts occurred on BLM lands, but on adjacent private lands. BLM is currently consulting with USFWS on a grazing permit renewal and is recommending (in consultation with USFWS) several mitigation measures to reduce grazing and grizzly bear conflicts. BLM will continue to consult with USFWS, Endangered

*Billings and Pompeys Pillar National Monument
Proposed Resource Management Plan and Final Environmental Impact Statement*

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
				Species Office.
DR-MTDK-BL-13-0246-21	Wildlife	Page 3-84, Long-billed curlew: BLM lands on the east side of the Beartooth Mountains are nesting and breeding habitat for these birds.	n	Thank you for the comment. This area will be added to the observation narrative on page 3-85.
DR-MTDK-BL-13-0246-22	Wildlife	Pages 3-85 -" 86, Sage grouse: Poor grazing management is conspicuously absent from the list of factors causing deterioration of sage grouse habitat. Grazing and sagebrush manipulation are two of the most important factors affecting the quality of sage grouse habitat in south central Montana. FWP believes that greater emphasis should be placed on grazing management in the maintenance of sage grouse habitat. Also, there are contradictory statements regarding fire, one stating that wildfire causes habitat loss, and another saying that disturbances such as fire allowed sagebrush to persist on the landscape. In general, fire results in the long-term loss of big sagebrush habitat.	n	Add the following underlined statement to page 3-85 referencing sage grouse threats at the end of paragraph 4. A summary of "Threats to Greater Sage-Grouse and Their Habitat" is described in Appendix AA (section B). Grazing management is listed as the second threat from the 2005 Management Plan and Conservation Strategies for Sage-Grouse in Montana. The document states - "disturbances such as fire allowed sagebrush to persist on the landscape." appears to be a poorly written statement when viewed out of context. The entire statement read, "Greater sage-grouse habitats in MZ1 were historically a function of the interaction of physical factors(...) , and natural disturbance factors (e.g., fire, grazing, drought) that allowed sagebrush to persist on the landscape. These physical and natural factors combined to produce an interspersed and juxtaposition of different habitats that included large expanses of sagebrush patches favorable for greater sage-grouse occupation." Also, later in the same paragraph on page 3-87 it states, "Big sagebrush is easily killed by fire at all intensities, ..."
DR-MTDK-BL-13-0246-23	ACEC	Pompeys Pillar National Monument and ACECFWP had some difficulty distinguishing between management actions intended for each area specifically or for the area as a whole, and as such, the distinction between the Monument and the ACEC should be made clearer. In general though, FWP is concerned with the lack of emphasis on the FWP/BLM/Pheasants Forever Habitat Partnership to enhance wildlife habitat and increase recreational opportunities, including hunting, on the ACEC. Under Issue 10 from Chapter 1, page 1-14, it is stated that Pompeys Pillar National Monument and ACEC will be managed to provide for interpretation, use, and enjoyment while protecting the significant resource values, providing for user safety, and maximizing socio-economic benefits. FWP has made substantial investments of manpower and dollars to the Habitat Partnership, and we would like to see that stated more specifically. FWP would also like to see a statement in this document that clearly identifies the Habitat Partnership, habitat enhancement through agricultural practices, and hunting as long-term priorities on the ACEC.	N	Thank you for your comment. Text will be revised in chapter 3 in response to your comment.
DR-MTDK-BL-13-0246-	ACEC	On page 2-122, fourth paragraph from top, the following statements are made: Cultivation for wildlife habitat improvements at the Sundance Lodge Recreation Area and at Pompeys Pillar ACEC would continue. Changes in cultivation	N	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
25		patterns, seasons of use, and type of activity, including termination of use, could occur during project level review. The first sentence states that wildlife habitat improvements will continue on both areas, but the second says that changes may be made including termination of use. FWP is unsure of the intent of this statement, and hope that it does not reflect a lack of commitment by BLM to the Habitat Partnership		Field Office and Montana State Office and documented in the administrative record associated with the B&PPNM RMP/EIS.
DR-MTDK-BL-13-0246-26	ACEC	On page 2-195, first paragraph, Under all Alternatives, Pompeys Pillar ACEC (432 acres) would continue to be managed to protect the historical, cultural, and biological values, including its outstanding viewsheds and unique resources of the area. Emphasis on providing opportunities for interpretation, education and enjoyment of the area would continue. Again, FWP would like to see mention of the Habitat Partnership and hunting somewhere in this paragraph.	N	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the B&PPNM RMP/EIS. The ACEC is being managed for the relevant and important values for which it was designated.
DR-MTDK-BL-13-0246-27	edits	On pages 2-139, at the bottom of the page under Management Zones, Alternative A lists the utilization of agriculture in the General Management Zone, but Alternatives B, C, and D (which include the preferred alternative) do not mention agriculture. Agricultural practices are vital components of managing the wildlife habitat in this area. FWP believes this could open the door to phasing out the use of agricultural practices by placing higher priority on visitor service needs (i.e., interpretive signs, trails, picnic areas, etc.) to the detriment of habitat and hunting, the primary emphasis of FWP's participation in the Habitat Partnership.	n	Thank you for your comment. Text has been changed in chapter 2 to address your concerns.
DR-MTDK-BL-13-0246-28	Wildlife	On page 3-71, section 3.7.3.1.10, Primary threats to upland game bird populations in the planning area include habitat loss, habitat fragmentation, possibly West Nile virus, and adverse weather conditions. Hunting pressure can also affect upland game bird population locations where hunting pressure is concentrated, such as Pompeys Pillar. Hunted birds may move to adjacent habitat as hunting pressure increases. However, as with big game, MTFWP regulates upland game bird hunting. FWP is not sure about the intent of the statements concerning hunting pressure. While there may be some temporary displacement of individual birds as a result of hunting pressure, particularly in poor quality habitat, FWP disagrees that populations are shifted as a result of hunting pressure. The purpose of the Habitat Partnership is to provide high quality habitat that produces birds and maintains numbers on the area whatever the hunting pressure.	n	Thank you for your comment. Text has been changed in Chapter 3 to address your concerns.
DR-MTDK-BL-13-0246-29	Wildlife	On page 3-191, section 3.21.2, An agreement with MTFWP and the Yellowstone Chapter of Pheasants Forever enables them to assist BLM with management of the property. FWP appreciates the mention of FWP and Pheasants Forever, but would like to see the Habitat Partnership described and emphasized in more detail.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS. The issue raised in your comment will be considered by the Billings

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
				Field Office during implementation of the Approved RMP when project-specific plans are prepared or evaluated. MTFWP and the Yellowstone Chapter of Pheasants Forever have agreed to de-emphasize by the end of 2014, management priority for Sundance Lodge due to conflicts between wildlife habitat and intense recreational use of the area. The area will remain open for hunting
DR-MTDK-BL-13-0246-3	Wildlife	On page 2-46, Big Game Winter Range, Alternative D, the preferred Alternative: CSU - Within big game winter range habitat (Maps 15-20), the proponent would be required to conduct big game inventories in the project area prior to conducting any operations. If big game concentrations are found, the following CSU constraint would apply to maintain the habitat, avoid habitat loss and minimize disturbance: surface occupancy and surface disturbance density and / or mitigation plan. FWP's experience indicates that the use of winter range in a given year depends on a variety of factors including winter severity, forage conditions, big game density, and land use practices on adjacent lands. Thus the number of animals present at any one point in time may or may not be an accurate depiction of winter range. If an area is mapped as big game winter range on the included maps, it should be treated as such regardless of the number of animals present at a particular time. FWP supports Alternative B which applies stipulations to all mapped winter range. FWP makes an exception to this recommendation for antelope. Antelope winter range is not mapped in the draft RMP, as FWP has not identified specific antelope winter range. However, all general antelope range is also potential winter range. If a lease/disturbance is proposed outside of existing defined big game winter range, we recommend the proponent conduct multiple antelope surveys during the winter period prior to conducting any operations. If antelope are present then the CSU (density and mitigation) for big game winter range should apply. If/when an antelope winter range map is developed by FWP, it could be incorporated into the RMP and treated like other big game winter range.	n	Instruction Memo No. MT-2010-004, "Guidance on Coordination with Montana Fish, Wildlife and Parks During Oil and Gas Lease Parcel Reviews," 10/7/-2009. The new procedures were developed at the request of MTFWP and coordinated with the FOs, MTFWP, and the Montana State Office, BLM. All leasing decisions are coordinated with MTFWP.
DR-MTDK-BL-13-0246-30	Edits	On page 3-212, section 3.26.4, In addition, the Pompeys Pillar property has been and remains a rich habitat for fish and wildlife resources. The wildlife species present there are typical of the riverine environment of the middle Yellowstone Valley in the early nineteenth century. FWP would like to see mention of the introduced species ring-necked pheasant and Merriam's turkey as contributing much desired recreational opportunities for the public.	n	Thank you for your comment. Text has been changed in Chapter 3 to address your comment
DR-MTDK-BL-13-0246-31	Edits	On page 3-213, section 3.26.5, Pompeys Pillar also offers exceptional recreational activities, including hunting, in the general management zone. Wildlife viewing, photography, and dispersed recreational opportunities are among the most frequently-use visitor uses. FWP appreciates the specific mention of hunting here. The other activities listed should be included, but these are not the most frequently-used visitor uses -" far more hunting occurs in this	n	Thank you for your comment. Text has been edited in response to your comment.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		zone than any other activity. Additionally, the FWP acquisition should be listed as the Yellowstone Wildlife Management Area and Yellowstone River State Park rather than the Circle R.		
DR-MTDK-BL-13-0246-32	Wildlife	On page 4-7, section 4.1.1.4.4, Various treatments have been applied across the decision area to improve wildlife and fisheries habitat. The majority of the acres impacted include food plots which are planted on an annual basis at the Sundance Lodge SRMA and Pompeys Pillar ACEC. Since 2006, an average of 84 acres per year has been planted collectively between the two areas. These treatments are expected to remain at this level over the life of this plan. FWP appreciates the statement that the food plot treatments are expected to continue over the life of the plan. Additional information could be provided about the conversion of crop and hay ground to permanent nesting cover. Also, it should be noted that these activities are largely being done through the Habitat Partnership.	N	Thank you for your comment. Text has been changed in Chapter 4 to address your concerns.
DR-MTDK-BL-13-0246-33	NEPA	BLM Lands Within Or Adjacent To FWP WMAs FWP finds no reference to any special designation or protections given to BLM lands within or adjacent to FWP WMAs. There are BLM lands within or adjacent to Big Lake, Haymaker, Silver Run, and Yellowstone WMAs. Surface disturbing or other significant habitat altering activities on these lands could adversely affect the WMAs. FWP asks that BLM give some additional consideration to protecting these lands from development.	N	Thank you for your comment. Should development occur on the BLM parcels identified, site specific NEPA analysis would occur and the MT FWP would be invited to comment on the NEPA analysis.
DR-MTDK-BL-13-0246-34	Fisheries	Fisheries comments on the Billings Area RMP: FWP recommends adoption of fisheries protections proposed in Alternative B including 1/2 mile NSO setbacks on blue and red ribbon trout streams, YCT populations and YCT suitable habitat, and 1/4 mile setbacks on riparian areas, wetlands, water bodies, all perennial streams, and flood plains of perennial streams. These stipulations provide the best protection for the important native and recreational fisheries and habitat located in this RMA, and also provide reasonable protection for all perennial streams and wetlands in the area. These setbacks not only provide good protection from disturbance of riparian areas and from the impacts of sedimentation due to development, but they also provide enough of a buffer zone to prevent contamination of important waterways from potential spills that can occur during development or operation. Setbacks also help protect the important recreational value of the rivers and streams in this RMA by protecting the scenic value for recreational users along these waterways. Similar protection for the aquatic environment has already been established in the Butte RMA plan and it is important to maintain consistency between adjoining RMAs. FWP admits that many of the streams shown on Map 28 Volume IV as YCT suitable recovery habitat are no longer suitable for recovering YCT due to dewatering, the presence of nonnative fish populations or other habitat changes, and these streams may not warrant a 1/2 mile NSO setback. However, the final RMP	n	Thank you for this comment. During NEPA analysis conducted at the project level for any action with potential effects to the environment, BLM resource specialists will identify potential impacts to fisheries and fish habitat, including suitable recovery habitat. In Section 2, pgs 2-80 and 81 of the DRMP, BLM incorporates multiple actions in the "management common to all alternatives" section. These actions correspond with guidelines set forth in the Conservation Strategy for YCT. With these management actions in place, NEPA analysis would identify impacts to YCT habitat, occupied or otherwise and ensure decisions are made that will protect that habitat.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		should specify that there will be a site-specific analysis on any potential lease involving any of these streams not protected by other designations before these leases are exempted from the 'A mile NSO.FWP has concerns with waiver, modifications and exemptions for all stipulations as written in the current document. Before the BLM modifies any stipulation, FWP recommends that BLM consult with other potentially impacted agencies including FWP to obtain concurrence on potential changes. The fisheries recommendations contained herein have already been established in other RMPs in Montana, and cumulatively, the fisheries recommendations will impact less than 10 % of the Federal fluid mineral estate in the Billings planning area. With today's technology including directional drilling, these stipulations should not prevent the development of any mineral resources in the management area, but will provide vital protection for the important aquatic resources in the area.		
DR-MTDK-BL-13-0246-4	Wildlife	Also, regarding big game winter range, acceptable levels of surface disturbance density are undefined in the plan. We request that FWP consultation be required under Alternatives B and D to determine acceptable levels of surface disturbance density for each proposed development site as needed.	n	Surface disturbance density would be coordinated with MTFWP. Density will be dependent on many parameters including habitat condition, terrain, animal species affected, development density, type of development, etc.
DR-MTDK-BL-13-0246-5	Wildlife	Regarding Big Game Parturition Areas, in various places in the draft RMP there are TLs for "established big game parturition habitat". Since FWP has not mapped such areas, this designation in its present form is of limited use. Parturition habitat is typically rather dispersed across the landscape, frequently occurs on portions of the winter/spring range, and varies by species. This is not conducive to coarse scale mapping. One solution would be to continue the winter range stipulation through July 1, which for the most part, is what the Forest Service has done (at least locally). Another possible approach is to require consultation with the local biologist before permitting work during the spring period on any big game winter/spring range. Similar to antelope winter range, mention should be made that if FWP develops such maps in the future these can be incorporated into the RMP.	n	MTFWP would be consulted on any spring activity affecting big game parturition. Instruction Memo No. MT-2010-004, "Guidance on Coordination with Montana Fish, Wildlife and Parks During Oil and Gas Lease Parcel Reviews," 10/7/-2009. The new procedures were developed at the request of MTFWP and coordinated with the FOs, MTFWP, and the Montana State Office, BLM. All leasing decisions are coordinated with MTFWP. Other future research and data will be incorporated through the "Adaptive Management" approach described in Section 2.3.4,
DR-MTDK-BL-13-0246-6	Wildlife	On page 2-46, Bighorn Sheep, we support NSO on designated bighorn sheep range. FWP is confused about Alternative D (the preferred Alternative) that lists NSO, but also has a CSU. How there can be a CSU when an NSU is in place?	n	Note that on page 2-72, the NSO applies to bighorn sheep lambing and winter range. The CSU applies to all bighorn sheep habitat. "Lambing and winter range" will be added to clarify that statement.
DR-MTDK-BL-13-0246-8	Wildlife	On page 2-72, Big Game Winter Range, Over the snow vehicles would be prohibited in big game crucial winter range. FWP has not used the designation 'crucial winter range', but uses only the designation 'winter range'. The reference to 'crucial winter range' should be removed from this statement and other places where it is referenced in the document and replaced with 'winter range'.	n	The term "crucial" will be deleted in that statement. Although, designated Crucial Winter Ranges will be used in lieu of CAPS data when the data is available. If crucial winter range data is not available, CAPS data will be used. Any references to CAPS data will be updated when Crucial Winter Ranges are designated.
DR-MTDK-BL-13-0246-9	Wildlife	On page 2-79, Sage Grouse, Alternative D (the preferred Alternative), the winter stipulation of a two mile buffer around leks is inadequate. FWP prefers Alternative B which uses the TL within four miles of a lek, but if that Alternative is not selected, FWP would like an Alternative with at least a three mile buffer.	n	Thanks for your comment.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		Research data shows that many female grouse may be located up to three miles from a lek during winter.		
DR-MTDK-BL-13-0247-1	NEPA	<p>In addition to the DEIS comments I provide in this letter, I urge you to grant at least a 120-day extension to the DEIS comment period in order to give all the interested parties adequate time to provide meaningful comment upon the DEIS. This request comes for several key reasons. First, the sheer volume of the document makes it impractical for ordinary citizens to evaluate the DEIS and make informed comments. The DEIS consists of multiple volumes numbering several thousand pages. The maps, backup materials and cited references require additional research time and effort that extends the ordinary reader beyond a 90-day deadline for effective review. Second, as I understand the current document, it is at least partially incomplete. The Billings and Pompeys Pillar National Monument DEIS did not contain individual route reports for motorized and multiple-use recreation closures when it was published. BLM sent out an e-mail notice on May 13, 2013 with a web site link to the detailed route information. However, when my staff attempted to follow this web site link, the Internet browser could not display the information. Attached to this letter is a screen shot of the browser's attempt to retrieve this information. I have serious concerns about the public's ability to access information that is vital to their ability to review the BLM's proposed decision because this travel information was provided nearly halfway through the public comment period, and because it appears to be inaccessible even after it was posted. The National Environmental Policy Act and its implementing regulations require an agency to provide the detailed information on its proposed decision to the public. It appears BLM has failed to meet that standard in this instance. The third reason I request an extension is because I understand that a significant part of the BLM's plan is intended to protect sage grouse habitat and populations. While I support this goal, I fear the proposed plan is an unnecessarily onerous restriction upon oil and gas development, coal development, agricultural grazing and operations, multiple-use recreation, and other important public lands uses in this area. I believe there is a more effective way to protect sage grouse without drastically impacting Montana's major economic drivers in over one-third of the State. The area covered by this DEIS is one of the most important future economic development areas in Montana. BLM manages 3 million surface acres and 12 million sub-surface acres. In addition to that, the activity or restrictions on BLM land affects neighboring private, state and Tribal land. In short, a poorly-crafted or overly-broad BLM land use restriction can have the effect of shutting down resource development on neighboring lands owned by others, including the State of Montana. Eastern Montana has vast untapped oil, gas, coal, wind and other resource potential, and I believe the BLM restrictions proposed in the DEIS could have untold consequences for current and future generations of Montana</p>	N	Thank you for your comment.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		<p>workers and families. As you may know, Montana Governor Steve Bullock recently appointed a Sage Grouse Advisory Council According to the Montana Department of Fish, Wildlife & Parks (FWP) Director Jeff Hagener, "The council will lead the effort to develop and carry out management options to ensure sage grouse are maintained as an integral part of Montana's wildlife heritage while still allowing other managed uses of the land." I strongly urge you to extend the DEIS comment period so the Governor's Sage Grouse Advisory Council and Montana FWP can have the appropriate time to review this proposal, provide additional substantive comment, and chart a plan for Montana to take the lead in protecting and managing this important species, rather than the BLM doing so in a manner that harms other vital state interests. The fourth reason this plan needs an extension period is because the BLM's land planning efforts appear to be exceeding its authority in the arena of air quality. Under the Clean Air Act, the Environmental Protection Agency and the State work hand in hand to manage for clean air standards, with the State as the primary and preferred air quality management sovereign. As you may know, Montana and the EPA have recently completed an air quality plan for the State. The BLM's management under the DEIS appears to have been created in isolation from the EPA / Montana plan, and is in fact more restrictive than that plan. I urge you to examine this issue, and to allow all parties more time to evaluate this troubling proposal. Finally, I have serious concerns about the way the DEIS cooperated with numerous Montana local governments, including county commissions and grazing districts, under the cooperating agency status provisions in federal law and regulations. As you are aware, land management documents like this must be consistent with local government resource plans. If they are inconsistent, the DEIS must disclose and discuss any inconsistencies with local plans and laws, and discuss how these inconsistencies will be reconciled. The DEIS must evaluate the environmental consequences resulting from its conflict with local resource plans. And perhaps most importantly for this document, the DEIS must evaluate and discuss the economic impact of its proposed action, and the impact of its inconsistency with local government resource plans. In this regard, numerous local governments have expressed to me that the DEIS did not evaluate their resource plans, did not evaluate inconsistencies with such plans, and did not adequately analyze the economic impacts of its restrictions compared to local government resource plans. These same concerned local government leaders also feel they were surprised by many of the provisions contained within the DEIS, which were contrary to what they had reviewed in their role as cooperating local government and agency representatives. I urge you to ensure BLM officials fully utilize the cooperating agency process in good faith, with full disclosure, and with respect to the role these local citizen representatives have under federal and state law. For all of these reasons outlined above, I urge you to give</p>		

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		<p>Montana citizens and government leaders more opportunity to review this voluminous draft RMP. I believe a 120-day extension would assist all of us in evaluating and providing informed comments on this document. I look forward to your response, and I will appreciate the opportunity to work cooperatively with the BLM and Department of Interior officials on responsible land and resource management in Montana.</p>		
DR-MTDK-BL-13-0248-1	Air	<p>DEQ is concerned that our federally approved authority to manage air quality resources within the State of Montana has not been properly considered or embraced within the resource management partnership reflected in the draft Billings and Pompeys Pillar Nation Monument Resource Management Plan and Environmental Impact Statement (RMP). As stated in the RMP, the Memorandum of Understanding Among the U.S. Department of Agriculture, U.S. Department of Interior, and U.S. Environmental Protection Agency, Regarding Air Quality Analyses and Mitigation for Federal Oil and Gas Decisions Through the National Environmental Policy Act [NEPA] Process (MOU) is an agreement designed to facilitate the completion of the National Environmental Policy Act environmental analyses for Federal land use planning and oil and gas development decisions. The MOU sets forth collaborative procedures that the Air Quality Technical Workgroup, consisting of representatives from Bureau of Land Management (BLM), EPA, U.S. Forest Service (USFS), U. S. Fish and Wildlife Service (FWS), and National Park Service (NPS) use to analyze potential air quality and air quality related value impacts and develop the adaptive management strategy outlined in the Air Resource Management Plan (ARMP). While DEQ appreciates the opportunity to review and comment on the draft RMP and work with BLM regarding monitoring and data sharing, the resource management partnership would be much better served if DEQ had the opportunity to be an active participant much earlier in the planning process. The following comments identify DEQ's concerns regarding inconsistencies with Montana's air quality program, policy, plans, and authority. BLM participates in the Montana-Idaho Interagency Smoke Management Coordination Strategy, along with other-Federal Land Managers and-DEQ. DEQ recommends incorporating information regarding the Montana-Idaho Interagency Smoke Management Coordination Strategy into the RMP. DEQ is concerned with the terminology used in the draft RMP. The draft RMP contains numerous terms with unique legal and technical meaning and implications under the CAA. In many cases, the draft RMP terminology is not clearly defined and may have different meanings than established by the CAA (i.e. -" adverse impacts, increment analysis, air quality related values, design value, etc.). NPS and FWS have asserted that all non-Class I areas under their jurisdiction should be considered to be sensitive Class II areas. The justification used to determine which areas should be considered sensitive Class II areas is unclear. Impacts to sensitive</p>	N	<p>Thank you for your comment. See Appendix T, Air Resource Management Plan, Section 1.5. An additional description of the MDEQ air quality program and associated regulations has been added.</p>

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		<p>Class II areas would be modeled in the same manner as Class I areas; this is inconsistent with CAA requirements. DEQ is concerned about the use of air quality modeling at the planning stage. Without project specific information, several assumptions must be made to complete the modeling, which results in a quantitative analysis based on assumptions rather than an informed scientific evaluation. The draft RMP ARMP states that many small oil and gas emission sources are not required to obtain air quality permits from DEQ, unlike large stationary sources. This statement is misleading. As described above, DEQ implements a minor source program that requires sources with a PTE greater than 25 tons per year of any regulated air pollutant to apply for a permit to construct pursuant to the MAQP requirements or register with the DEQ pursuant to the registration requirements under the Administrative Rules of Montana. The vast majority of sources become regulated as a result of Montana's minor source permitting and 2 registration programs. In addition, many sources that fall below the 25 tons per year threshold have equipment standards and emission control requirements established through applicable New Source Performance Standards (NSPS). The draft RMP states that the oil and gas emission inventories were generally based on emission standards required by DEQ and EPA. The draft RMP identifies new Federal regulations and states that the oil and gas emission inventories will be updated in the final RMP to address these regulatory changes. However, it is not clear if BLM considered DEQ's reasonable precautions or emission control requirements in the inventory development. DEQ requests that BLM review their emission inventory assumptions and calculation for inconsistencies and ensure all applicable emission reduction requirements are considered and incorporated into the final RMP emission inventory as appropriate. Monitoring information provided in the draft RMP should be updated to reflect the current monitoring program. With the exception of the NCORE monitoring station, carbon monoxide monitoring was suspended throughout the state at the end of March 2011. In addition, the particulate monitor at the Billings St. Luke's Station is not a reference or equivalent method and the station does not meet EPA siting criteria. The Billings St. Luke's station is utilized for informational purposes only and does not meet the requirements to be officially used for NAAQS comparisons. DEQ requests that BLM review the monitoring station data provided within the draft RMP and supporting documents to ensure the ambient air quality concentration were calculated appropriately when comparing to the listed NAAQS standards. BLM has proposed monitoring-based mitigation measures in which monitoring data may trigger enhanced mitigation measures that are beyond BACT and NSPS. Under CAA authority, DEQ is required to take into account environmental benefit and economic and technical feasibility prior to requiring similar measures. In addition, DEQ is concerned that BLM may implement management strategies for</p>		

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		<p>the entire planning area based on a single monitored exceedance. DEQ recommends that BLM consider establishing spatial limitations when requiring enhanced mitigation measures. It would be inappropriate to mandate mitigation measures for an entire planning area that are not consistent with the CAA. Prior to completion of the photochemical grid modeling (PGM), BLM would review NAAQS exceedances and determine if enhanced mitigation is warranted. BLM has proposed to monitor EPA's Air Quality System (AQS) database to determine if monitoring data is showing an exceedance. It is not clear what criteria BLM will use to determine if an exceedance has occurred. DEQ requests that BLM include an explanation of how an exceedance will be determined in the RMP. Additionally, once data is posted to the AQS, even though available for review, the data may not be certified for several months. It would be inappropriate to compare uncertified data to the NAAQS. Additionally, DEQ cautions BLM against imposing enhanced mitigation measures based on uncertified data. Following completion of the PGM, BLM has proposed to calculate site-specific design values for each pollutant monitored at a federal reference monitor within the planning area. If a BLM calculated design value is greater than 85 percent of the NAAQS, enhanced mitigation measures would be evaluated and selected by the BLM, in cooperation with DEQ, 3 etc., when appropriate. It is unclear to DEQ what criteria BLM will use to determine when it is appropriate or not appropriate to consult with DEQ. Additionally, establishing a threshold of 85 percent of the NAAQS does not appear to have any legal basis within the CAA. It is unclear under what authority BLM plans to implement mitigation measures based on this proposed threshold. It is unclear within the draft RMP who and how the proposed mitigation measures will be implemented and how DEQ would be involved in these efforts. DEQ must consider the implementation of any new requirements and ensure that these requirements are incorporated in a way that is consistent with DEQ's implementation authority. Furthermore, DEQ is concerned that BLM does not sufficiently recognize the potential conflicts and confusion certain proposed mitigation measures may cause with implementation of DEQ's air quality program.</p>		
DR-MTDK-BL-13-0249-1	NEPA	<p>Impact Analysis Overall, FWP found the impact analysis section read more as a summary of the different alternatives and lacked specificity on the implications of a given action on a specific resource. We encourage the BLM to consider impact metrics that would specify the anticipated outcome to the resources. A metric, for example, might be density of well pads per section that can then be extrapolated to an estimated population response by sage-grouse. The lack of quantifiable impacts is not unique to the Billings Field Office; however, without a more detailed analysis it is difficult to support a particular action for a given resource.</p>	N	Thank you for your comment.
DR-MTDK-BL-	Livestock Grazing	<p>Rangeland Health Standards FWP agrees that failure to achieve rangeland health standards negatively impacts the rangeland resource, and consequently</p>	n	Standards for rangeland health (Appendix I) were designed to cover the wide range of ecological sites, habitats, and individual species needs that occur

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
13-0249-2		sage-grouse. However, there is insufficient detail to ascertain how making progress toward or meeting rangeland health standards will contribute positively to sagegrouse habitat requirements. FWP has found variation in interpretation of rangeland health standards among BLM Field Offices in Montana. Quantifiable metrics are needed that allow the public to understand how rangeland health standards as applied in the Billings Field Office would affect sage-grouse habitats and ultimately populations.		throughout BLM managed public lands. Please refer to Standard 5. It is stated in this standard "The environment contains the necessary components to support viable populations of a sensitive/threatened and endangered species in a given area relative to site potential." In 2012 BLM policy (Instruction Memorandum No 2012-043, listed in appendix A) regarding the greater sage grouse provided guidance, including quantifiable metrics, as to how the BLM would assess sage grouse habitat. This framework is listed in Appendix AA. If habitats do not provide the necessary components as outlined in the policy, the area fails standard 5.
DR-MTDK-BL-13-0249-3	wildlife	The criteria used for designating sage-grouse habitat were provided for readers; however, FWP could not find a discussion of the site-specific factors that contributed to a particular designation. Specifically, most of the BLM lands in Yellowstone County and south Musselshell County were designated as Potential Restoration Areas, yet we found no text that described how the conditions in these areas differed from other sage-grouse habitat. Similarly, FWP could not find a description of how proposed management in Potential Restoration Areas would meet the stated objective of "...BLM would manage habitat so that sage-grouse populations can be restored over the long-term. BLM would strive to restore historical sage-grouse habitat functionality, or at a minimum, have no net loss of sage-grouse habitat, to support sage-grouse populations." We encourage BLM to more clearly articulate the differences between sage-grouse habitat designations and how the proposed management will meet the stated objectives.	n	<p>Instruction Memorandum No. MT-2010-017, Nov. 30, 2009, "Guidance for Greater Sage-Grouse Management and Conservation in Resource Management Plan (RMP) Revisions in Management Zones 1 and 2 Within the Montana/Dakotas BLM" describes Montana BLM's guidance for identifying and managing sage grouse habitat. More detail for Restoration Areas is described as: Restoration Areas:</p> <p>Maintaining populations is a priority for restoration because strong site fidelity in sage-grouse makes natural re-colonization slow and past precedence has documented that translocations into areas with no resident populations are unlikely to succeed. Therefore, in Restoration Areas, the goal is to achieve a balance between ongoing and future resource use so that enough quality habitat is maintained to allow some residual populations in impacted areas to persist. These remnant habitats and populations will likely decrease the time needed for restoration and reclamation efforts. In addition, maintaining populations across the landscape will promote sage-grouse movement and genetic diversity so that sage-grouse habitat areas remain connected to one another in the future. The intent is to have connectivity between populations within and across management zones. In restoration areas, the variation in the density of current impacts may result in difficulties in applying universal stipulations that can meet the objectives for the area. Planning teams should consider options for varying stipulations across different levels/densities of impacts or quality of remaining habitat within the restoration priority areas (e.g., cluster development in the most impacted areas and have more stringent stipulations for the least impacted leks and habitat, or most important lek(s) needed for future restoration of sage-grouse populations).</p> <p>Specific GIS data sources included: land ownership (surface and subsurface), vegetation/ habitat, surface disturbance, oil and gas activity, wildfire history, sage grouse lek locations and counts, etc.</p> <p>Also, Page2-67, Sage-grouse habitat delineations may be modified as needed,</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
				as local site conditions change or as new information becomes available.
DR-MTDK-BL-13-0249-4	NEPA	FWP requests that the BLM hold open sections of the RMP that address sage grouse conservation to allow inclusion of recommendations that arise from the Governor's Sage Grouse Habitat Conservation Advisory Council. The final recommendations from this Council will be released in January, 2014.	N	Thank you for your comment.
DR-MTDK-BL-13-0249-5	Wildlife	FWP recognizes that development of land management plans takes multiple years, during which time new information can become available. We encourage BLM to incorporate more recent information in final Resource Management Plans, specifically: Montana Natural Heritage Program conducted Sprague's Pipit (ESA Candidate Species) surveys in 2012 and recently produced updated habitat suitability maps for the species. Habitat suitability maps show moderate to optimal Sprague's Pipit habitat in Wheatland, northern Sweet Grass, and northern Golden Valley Counties. FWP requests that BLM consult these data and address impacts of management actions on this species in priority Sprague's Pipit habitat. Montana Bird Distribution Committee. 2012. P.D. Skaar's Montana Bird Distribution, 7111 Edition. This document should be used in place of Lenard et al. 2003. Knick, S.T., Hanser, S.E., and K.L. Preston. 2013. Modeling Ecological Minimum Requirements for Distribution of Greater Sage-Grouse Leaks: Implications for population connectivity across their western range, U.S.A. Ecology and Evolution DOI- 10.1002/ece3.557. We encourage BLM to use and reference this paper where appropriate.	n	Thank you for the comment and references. Updated references will be added. BLM intends to rely on the latest research and best available science by utilizing existing research and incorporating other future research through the "Adaptive Management" approach described in Section 2.3.4, page 2-7. Refer to Table 2-6.1, page 2-70, "Surface-disturbing and disruptive activities would be avoided from April 15 through July 15 in Sprague's pipit habitat. Surface use for oil and gas exploration, (including geophysical exploration) is prohibited from April 15 through July 15 in Sprague's pipit habitat. (TL) Sprague's pipit habitat is defined as "Optimal or Moderately Suitable" habitat classes in MTNHP Maxent Inductive Model of Sprague's pipit breeding habitat (2011, Map 25) Also, Sprague's pipit needs to be added to Tables 2-5 and 2-6.2. Note: There is a very small percentage of public land in Golden Valley and Wheatland counties. BLM can only manage habitat on public lands.
DR-MTDK-BL-13-0256-1	WILD HORSES, PMWHR	the language in the preferred alternative seems to say BLM will manage to maximize resources for use of the horses. The horse range founding legislation calls for thriving natural ecological balance ... a balanced program which considers all values without impairment to the productivity of the land". Words like balance, consideration of all values, appropriate management level seem to be in conflict with preferred alternative that repeatedly pushes the idea of increasing horse numbers and managing to maximize conditions for the horses.	N	Thank you for your comment
DR-MTDK-BL-13-0256-10	Travel mngt	Appendix 0 in the RMP speaks of "routes ... associated with specific recreation activities". Those listed include only "hunting, archery hunting, vehicle exploring, viewing wild horses and viewing wildlife." This short list leaves out many visitors who are looking for scenery, wildflowers, solitude, photography, butterflies, birds escape from hectic traffic and crowds, relaxation, clear skies for astronomy, complexity of plant communities, scientific studies and many more.	n	Thank you for your concern and your comment. The text has been amended to reflect your concerns
DR-MTDK-BL-13-0256-11	Travel mngt	What about routes "associated with" foot or equestrian "exploring"? Or motorized routes for access to hiking routes? Comments have been made that people can just hike/ride anywhere - designated trails are not needed. What's a common question front line employees hear from walkers/hikers/horsemen? "Where are quiet trails I can use, where's the trailhead, do you have a map? I've never been here before and don't know where to go. My horse doesn't do well with ATVs."	y	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		Most people would like a track to follow in the Pryors whether it's a loop or a destination with special views. The topography of the Pryor canyons does not lend itself to walking cross county unless the cross country travelers have advanced map skills and are knowledgeable about off trail travel in rugged terrain. The motorized roads, routes, two tracks, trails, travel ways, whatever they are called, have proliferated beyond reason in the Pryor Mountains. Wildlife secure areas and cover have become limited. Noxious weeds are spreading at an alarming rate. Any map will show a spaghetti-like tangle of motorized travel in the Pryors and its accompanying veil of noxious weeds. In BIFO's TMA the preferred alternative has 130 miles designated for motorized users - ZERO miles are designated for non-motorized users.		The BLM Travel Plan section in the RMP has been altered to reflect the new BLM Manual 1626 prescriptions and guidance, which proscribes designating both motorized and non-motorized travel components. Please see Chapter 2 and Appendix O for non-motorized changes.
DR-MTDK-BL-13-0256-12	Travel mgmt	Change the current method of providing motorized and non-motorized recreation opportunities which designates motorized routes now while "non-motorized routes would be considered .. [later]" Both need to be designated now in a balanced plan to provide diverse recreational opportunities and minimize use conflicts. The designation of certain tracks for motorized use now precludes their designation as nonmotorized routes later. Motorized routes should not get "first choice" with non-motorized routes getting the "left-overs". In making a travel plan, address the issue of conflict of uses as well as conflict of users. Acknowledge that motorized recreation consumes more of the resource than does non-motorized recreation per RVD.	n	Thank you for your concerns and comments. The BLM Travel Plan section in the RMP has been altered to reflect the new BLM Manual 1626 prescriptions and guidance, which proscribes designating both motorized and non-motorized travel components. Please see Chapter 2 and Appendix O for non-motorized changes.
DR-MTDK-BL-13-0256-13	Travel mgmt	Recognize and explain to the public the difference between authorized and unauthorized motor routes. Removing an unauthorized route from public use is NOT closing a road - it is correcting a trespass.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS.
DR-MTDK-BL-13-0256-14	Travel mgmt	The initial segments of the Bear Can on Creek Trail from the BLM barricade (0.5 mile) to the Forest boundary and the Bi S Trail (1 mile) should be designated for non-motorized use.. Walkers should not have to compete with 4WDs before they get to non - motorized trail.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS In regards to the Bear Canyon route, the RMP has a range of possible decisions. In this case, due to the conditions you mentioned the Alternative D has been modified to reflect the current conditions. The route will be designated as "closed to motorized vehicles" while allowing motorized access by BLM administrative purposes. The route will be designated as a no-motorized trail. Refer to map 146
DR-MTDK-BL-13-0256-	Travel mgmt	BLM's preferred alternative authorizes an additional motor vehicle route (Graham Trail) up the southwest slope of Big Pryor Mountain. Now is the time to designate non-motorized routes to ensure a balance. Bear Canyon, with its	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
15		designation as an Audubon Important Bird Area, would be the best non-motorized route beginning at the mouth of the canyon.		and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS In regards to the Bear Canyon route, the RMP has a range of possible decisions. In this case, due to the conditions you mentioned the Alternative D has been modified to reflect the current conditions. The route will be designated as "closed" for motorized use with the exception of administrative access. Refer to map 146
DR-MTDK-BL-13-0256-16	Travel mgmt	Demijohn Flat, both a National Register District and an Area of Critical Environmental Concern, should be non-motorized. Motorized travel on the Demijohn Flat route threatens an important cultural area. Designation of the route as non-motorized would provide a good non-motorized route while protecting the area. No need for 4WD to get to the trailhead, there is convenient access point on Crooked Creek Road.	N	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the B&PPNM RMP/EIS. Demi-John Flat is a NR district, but only a portion of it is included in the Burnt Canyon WSA and East Pryor ACEC (alt A). Alt D includes all of Demi-John Flat NR district within either the WSA or the ACEC. In regards to the Demijohn Flat route, the RMP has a range of possible decisions. In this case, due to the conditions you mentioned the Alternative D has been modified to reflect the current conditions. The route will be designated as "closed" for motorized use with the exception of administrative access. Refer to map 146
DR-MTDK-BL-13-0256-17	Travel mgmt	The road (variously numbered 1082, 1077, 1076) that parallels Helt Road from its junction with Graham Trail in section 31, then crosses Stockman Trail in through section 5 to intersect with Bear Canyon Road and continues through sections 9 & 10 to intersect Horse Haven Road is redundant as a motorized route. The distance between the two tracks is variable but less than half a mile. The parallel road should be designated as a non-motorized route which allows non-motorized loop options	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS. The road is presently closed and remains so in the final RMP. It will be available for non-motorized use. Refer to map 146
DR-MTDK-BL-13-0256-18	Travel mgmt	Create an inventory of "redundant roads, tracks, travel ways, routes" for reclamation over the next five years and budget them into the general plan of work.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS. The comment is appropriate to the follow-on Implementation-level Plan for the TMAs and will be incorporated into that Plan.
DR-MTDK-BL-13-0256-19	Travel mgmt	Consider whether safety of the general public is being impaired by the lack of regulations or rules regarding age at which an individual can responsibly drive/ride a motor vehicle. Presently, there is no regulation or direction. I have seen children who appear to be under the age of 8 years driving ATVS in the	n	Thank you for your concerns and comments. In regards to age restrictions for operating OHVs, the BLM defers to the State of Montana regulations. The enforcement or compliance of these regulations is not an RMP level issue.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		Pryors. See High Country News June 24, 2013; The ATV Culture Includes Loose Regulations and Kids' Funerals by Ray Ring.		
DR-MTDK-BL-13-0256-2	WILD HORSES, PMWHR	the preferred alternative direction ignores the issue of special plants (Lequellera and Shoshonea) within the horse range. I strongly recommend this section in the alternatives on horse management be rewritten to reflect the intent of the founding legislation.	N	Special status plants would not be addressed under wild horse management, but rather Special Status Plants. No information has been provided that impacts to special status plants are actually occurring.
DR-MTDK-BL-13-0256-20	Vegetation Invasive Species and Noxious Weeds	Incorporate an aggressive program of weed control in the travel management. Consider emergency road closures on routes that have serious noxious weed infestations. New construction of any kind should have a line item in the construction budget for weed control. Any ground disturbing activity on or near a road/trail should be monitored frequently to catch and treat new starts of noxious weeds. Continue to map weed populations and use all appropriate control-pulling, spraying and biologic agents on weeds. Continue to provide information brochures on weeds for the public and provide in depth information on weed interpretive sites at BLM boundaries and other appropriate locations along heavily traveled routes.	n	Thank you for your comment. The type of issues raised in your comment will be considered by the Billings Field Office during implementation of the Approved RMP when project-specific plans are prepared or evaluated.
DR-MTDK-BL-13-0256-3	Locatable Minerals	Commodity uses and removals such as fluid minerals leasing, common salable minerals, timber harvests, grazing are extractive in nature. They take away non-tangible resources of quiet, solitude and viewsheds as well as tangible resources of clean water, healthy productive ecosystems in the process of removing minerals. Commodity uses and removals must take a back seat when in conflict with protecting the Pryors landscape and ecosystems. Use No Surface Occupancy liberally	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS.
DR-MTDK-BL-13-0256-4	Vegetation Invasive Species and Noxious Weeds	Weeds can destroy a healthy ecosystem. Eradication of all noxious and invasive weeds must be a major priority for all managers and users of public lands. BiFO should develop a flexible emergency closure plan to close areas of high density weed infestations to motorized traffic until weeds are eradicated or brought under control. Or, a good management strategy may be keeping traffic out of weed-free areas.	n	Thank you for your comment. The type of issues raised in your comment will be considered by the Billings Field Office during implementation of the Approved RMP when project-specific plans are prepared or evaluated.
DR-MTDK-BL-13-0256-9	Travel mngt, recreation	Allocations of recreation opportunities must concede and factor into a use plan the reality that motorized recreation uses are heavier on the land per Recreation Visitor Day (RVD) than non-motorized recreation. Four ATVs with drivers consume a greater quantity of solitude, quiet and open space because of higher speeds and larger areas covered than do four hikers in the same time period. There is a point at which the numbers of recreationists (particularly motorized) over-consume the limited quantities of the very qualities they have come to the mountains to experience. Think what carrying capacity implies with grazing and timber - then consider that concept of carrying capacity in regard to recreation use.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS.
DR-MTDK-BL-	Water	The "2007 Montana Nonpoint Source Management Plan" is obsolete. It was replaced in 2012 by the "2012 Montana Nonpoint Source Management Plan".	n	Updated, Thank you.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
13-0264-1		The current (2012) plan is available for download at the following DEQ website: http://deq.mt.gov/wqinfo/nonpoint/NonpointSourceProgram.mcp		
DR-MTDK-BL-13-0264-2	Water	The 2010 Montana 305(b)/303(d) Integrated Report (for example, referenced on page 3-54) is outdated. Facts and figures from the 2010 report may have changed in later versions. The current version is the 2012 Montana 305(b)/303(d) integrated Report. A copy may be downloaded from the following website: http://cwaic.mt.gov/wq_reps.aspx?yr=2012qryld=101445	n	Will Update 3-54 and reference to it.
DR-MTDK-BL-13-0264-3	Water	Pages 1-22 and 1-23, Section 1.5.2 The Salinity TMDL for Sage Creek, Montana (MDEQ 2002) is referenced in this section. It was written for a geographical area well outside the planning area for the Billings DRMP	n	Thank you, will delete.
DR-MTDK-BL-13-0264-4	Riparian	Please include the "Priceless Resources, A Strategic Framework for Wetland and Riparian Area Conservation and Restoration in Montana, 2013 - 2017". A copy of this document may be downloaded by clicking on the cover page photo in the lower right-hand quadrant of the following DEQ web page: http://deq.mt.gov/wqinfo/wetlands/default.mcp	n	Added to page 1-22 list of state plans.
DR-MTDK-BL-13-0264-5	NEPA	Page 1-27, Section 1.6.2 It is not clear if the Montana Department of Environmental Quality has been invited to be a cooperating agency. MDEQ's Watershed Protection Section, responsible for the State's Nonpoint Source Management Program has an interest in addressing and support water quality protection and restoration from nonpoint source water pollution, including grazing practices. The Section would be interested in future cooperating agency opportunities.	N	Thank your for your comment. MTDEQ was invited to become a cooperating agency but either did not respond or declined. See table 5-1 in Chapter 5 for all the agencies invited to become cooperating agencies on this document.
DR-MTDK-BL-13-0264-6	Livestock grazing, riparian	Based on the Billings DRMP it appears that, in fact current policies and procedures for prescribing grazing BMPs DO NOT prevent riparian area degradation on approximately half of the riparian areas in the decision area. DEQ strongly recommends changes to the preferred alternative and the current grazing guidelines. They appear to have failed to meet the minimum requirements set forth in 43 CFR 4180.2(e) (see page 3-187 of the Billings DRMP) which include: Maintain or promote adequate amounts of vegetative ground cover Maintain or promote subsurface soil conditions Maintain, improve, or restore riparian-wetland functions Maintain or promote stream channel morphology Promote the opportunity for seedling establishment Maintain, restore, enhance water quality	n	Table 3-17 shows that 40 % of the riparian areas are in PFC, and 46% are in FAR. Therefore 86% of the riparian areas are Functioning. FAR is defined in the glossary as "A condition in which vegetation and soil are susceptible to losing their ability to sustain natural functioning biotic communities." While 50% of the riparian areas are FAR they are still functioning. Table 3-17 shows that 40 % of the riparian areas are in PFC, and 46% are in FAR. Therefore 86% of the riparian areas are Functioning. FAR is defined in the glossary as "A condition in which vegetation and soil are susceptible to losing their ability to sustain natural functioning biotic communities." While 50% of the riparian areas are FAR they are still functioning. The BLM is required to make changes to the grazing permit, if livestock is a causal factor of riparian degradation. As permits are renewed or riparian conditions are identified, these changes are made. Further monitoring then allows managers to determine if the changes were successful in improving riparian conditions. At which point, more changes may be needed to reach objectives. With this information, you can see how the process could take some time to get the grazing and riparian system in balance. The key to this comment response, though, is the fact that only eight percent of riparian areas are rated

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
				<p>as non-functional. A degraded system, to a point, can still be rated as “functional”, but “at risk”.</p> <p>A relatively new policy of analyzing impacts to livestock grazing permit renewals using NEPA Environmental Analysis will help identify issues with riparian health and promote livestock grazing and other activity decisions to improve or maintain riparian function.</p>
DR-MTDK-BL-13-0272-1	Wildlife,	It is difficult to maintain wildlife habitat i.e.: sage grouse if predators are allowed to continue destroying wildlife and domestic animals. The predators are out of control in the Grove Creek area. Every night we hear coyotes howling and have seen wolves and coyotes around the MT/WY lines. Coyotes and wolves love grouse eggs which are easily accessible for them. A hunting season for a bird that is supposedly considered scarce should be discontinued. Closing existing roads on BLM land is not the answer to saving the sage grouse.	n	Thank you for your comment. A discussion of “Predators in relation to sage grouse management” has been included in Chapter 3, pg.3-90.
DR-MTDK-BL-13-0272-2	Travel mngt	The present roads need to remain open for private land owners to access their property and homes by motor vehicle. As Grove Creek property owners, we also use these roads for recreational travel.	n	<p>Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS.</p> <p>BLM’s approach to Travel and Transportation management is set by BLM Manual 1626 and Technical Reference 9113-1 which has as its objectives the establishment of a sustainable multi-modal (including motorized, non-motorized, mechanical, and even animal powered modes of travel) transportation system of roads, primitive roads, and trails that address public and administrative access, support the agency’s mission and provide resource protection, as well as to manage these resources and uses in accordance with law, Executive Order, proclamation and policy. The decisions in the RMP reflect these considerations, not just for the purposes of recreational or private land access. Please note that the RMP states that the goal for the Grove Creek TMA is to minimize impacts to geologic, visual attributes, sensitive plants, cultural, and wildlife values while providing access for the public, permittees, non-federal landowners, and administrative needs.</p>
DR-MTDK-BL-13-0272-3	Fire Ecology and Management	Full suppression needs to be maintained for fire equipment to travel thru to suppress fires. The sideboards on how fire suppression would be maintained needs to be clarified. Please clarify the ACES policy.	N	<p>Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the B&PPNM RMP/EIS.</p> <p>Please see table 2-6.3 Grove Creek</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
				<p>Please see Appendix E for the resource evaluation on this ACEC. Also please refer to FLPMA Sections 103, 201, and 202 for the direction which it provides regarding the high priority BLM is to give in the designation and management of ACECs</p> <p>In response to your comment, the text in Alternative D for the Grove Creek ACEC of the Proposed RMP and Final EIS has been revised to state: Wildfire management (natural ignitions) for resource benefit. Full range of fire management activities would be used in ACEC in response to human-ignited fires. Use of heavy equipment and retardant would be avoided unless approved by authorized officer.</p>
DR-MTDK-BL-13-0273-1	Travel mgnt	In keeping this land whole and protecting the resource I hope you consider: Designating non-motorized trails at the same time motorized trails are designated. Keeping the BLM portion of the Big Sky Trail non-motorized. The small plants are often subspecies found in a limited number of areas and deserve protection. Designating the Bear Canyon route non-motorized. There are alternatives for motorized and the Audubon Important Bird Area deserves protection.	n	<p>Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS</p> <p>In regards to the Bear Canyon route, the RMP has a range of possible decisions. In this case, due to the conditions you mentioned the Alternative D has been modified to reflect the current conditions. The route will be designated as "closed" to motorized vehicles and will be designated as a non-motorized trail Refer to map 146</p>
DR-MTDK-BL-13-0274-1	cultural	The people of the Pawnee Nation thank you for submitting your project proposal for our review and comment. Given the information provided, you are hereby notified that there should be no Pawnee historic or archeological properties within your project site. Your proposed project location should have no potential to adversely effect any known archeological or historical Pawnee sites. Therefore, in accordance with 36 CFR 800.4(d)(1), you may proceed with your proposed project. However, should you encounter any unanticipated Pawnee human remains or cultural properties you must report them to us immediately as required by NEPA, NRHP and NAGPRA regulations.	N	Thank you for your comment.
DR-MTDK-BL-13-0276-1	WILD HORSES, PMWHR	Removal of old/unused enclosures in this area should be a priority. As these become weather-worn and fall into disrepair, they pose a threat of accidental entrapment, in direct opposition to the animal welfare directives these pens were originally designed to uphold. Pens in disrepair are a liability issue on many levels, and should be attended to by careful inventory and scheduled dismantling plans.	N	Thank you for your comment
DR-MTDK-BL-13-0276-2	WILD HORSES, PMWHR	As we are all aware, rapid advances in genetic technology are providing new opportunities for inter-species discovery. Ensuring the widest diversity within natural populations is essential to optimal genetic research. When herd management in this area is necessary, please remain cognizant of the value of	N	Thank you for your comment

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		each individual, and leave those exhibiting rare traits to propagate those alleles in future generations.		
DR-MTDK-BL-13-0276-3	WILD HORSES, PMWHR	Please include clear, strong language regarding public education and enforcement of policies, so the protected range inhabitants are not subject to unnatural disturbances in their habitat. Respectful use of these lands by all members of the public is a mandate from the founding documents that enabled us to establish these vast, irreplaceable resources for the citizens in our future generations.	N	Thank you for your comment
DR-MTDK-BL-13-0277-1	Livestock Grazing	There are some problems in matching information between one volume and another. For instance, the grazing allotments are only listed by numbers and numbers of AUM's. Either the name of the allotment and/or a brief legal description would aid in determining what was going on. Further the maps of the allotments in Volume 4 are virtually indecipherable as to lay out. I think the map in Volume 4 shows our entire ranch as being a grazing allotment. I know that it is NOT. Federal land is a small minority of our ranch holding. There are other issues of federal control such as split estate, but certainly not grazing control. There is a list of abbreviations indicating what endangered or threatened species may be in an area, but since the listing of grazing allotments is only by number or AUM's it is difficult to tell what things are really affecting a given allotment.	n	Thank you for your comment. Map number 122 (Range Allotments) does not easily depict the allotments. Due to printing constraints, the size of this map will not be changed, however allotment numbers have been included on this map, as well as BLM surface. The allotment numbers are small, and are not easily read on the hard copy version. The digital versions (CD, or web page) allow the reader to zoom in on a particular area. Additionally, with the addition of the allotment number, the reader can then reference appendix S, which includes the threatened, endangered, or special status species known to exist within an allotment. Grazing allotment boundaries listed on map 122 were derived from current map layers. Grazing allotments are typically composed of public, private, and occasionally state lands used conjunction for grazing purposes. The BLM is continuously updating allotment boundaries to reflect changes that may have occurred, typically as the result of fencing on private lands. These revisions typically occur during the consultation process during the grazing permit renewal.
DR-MTDK-BL-13-0277-2	Locatable Minerals	The cover letter states that BLM manages 1,839,782 acres of federal mineral and 434,154 acres of public surface, which would leave approximately 1,400,000 acres of federal mineral under private surface under the management of the Billings BLM Field Office. I got notice of this plan revision because I have a couple of small grazing allotments. I did not get notice because the federal government experience that federal control of public mineral can have just as much or more impact on private surface as dealing with federal grazing allotments.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS.
DR-MTDK-BL-13-0277-3	Coal	Where there are coal reservations, a lease can be similarly devastating. BLM assumes that the only surface effects of underground mining are where the processing area and tipple are located. From personal experience, I can attest there are many surface effects that are unforeseen	N	We appreciate your comment regarding the surface effects of underground mining.
DR-MTDK-BL-13-0277-4	NEPA	I find it interesting that the latest information on Signal Peak air quality is only 2008 (p. 4-13) from 5 years ago or maybe 2009 (4-11). It took Signal Peak until 2010 to really get revved up with the full longwall production. The 3rd full panel opened in the fall of 2012.	N	Thank you for your comment

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
DR-MTDK-BL-13-0277-5	wildlife	<p>There have been many surface adventures with an underground mine that supposedly would have no surface effects, an opinion stated often over the last 20 years since BLM traded away some of its best coal for deserts in Carbon County and fishing access on the Madison. December 1, 2011 Signal Peak ran a road in through a roadless area on our ranch, including on BLM surface, to claw portions of the face of Dunn Mountain down to stuff in cracks that opened two hundred feet down into the mine allowing Carbon Monoxide to form, and necessitating a massive nitrogen injection project complete with large trucks, lots of diesel storage, generators, lights and mancamps. The elk left their habitual fall hangout there and have been cautious about returning. Signal Peak has finally gotten a road permit across BLM surface and partially constructed the road. This right-of-way was not listed in the rights of way section. Signal Peak also plans to build a road across the face of Dunn Mountain, which will likely be visible as far as the scar for their emergency access of December 1, 2011. That scar is visible clear across the Yellowstone Valley. There are also holes for injecting gob sealer and nitrogen on top of Dunn Mountain, and the latest is another hole for gob injection where they had already injected, because the gob sealer had started leaking CO again. After December 1, 2011 nitrogen was injected into the mine for two months straight. Diesel motors ran fans on the south side of Dunn Mountain for over a year after that.</p>	n	<p>Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and documented in the administrative record associated with the Billings RMP/EIS</p>
DR-MTDK-BL-13-0277-6	Wildlife	<p>I didn't see that the agency had any plan to reconcile sage grouse recovery with mineral removal.</p>	n	<p>Thank you for your comment.</p> <p>The BLM's FLPMA (Section 103(c)) defines "multiple use" as the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people. Accordingly, the BLM is responsible for the complicated task of striking a balance among the many competing uses to which public lands can be put. The BLM's multiple-use mandate does not require that all uses be allowed on all areas of the public lands. The purpose of the mandate is to require the BLM to evaluate and choose an appropriate balance of resource uses which involves tradeoffs between competing uses. The FLPMA also directs the United States (US) Department of the Interior, Bureau of Land Management (BLM) to develop and periodically revise or amend its Resource Management Plans (RMPs), which guide management of BLM-administered lands, and provides an arena for making decisions regarding how public lands would be managed and used.</p> <p>While FWS has responsibility for threatened and endangered species, the BLM and the Forest Service manage a significant portion of sage-grouse habitat. Thus, although it is the FWS's responsibility to administer the Endangered Species Act, management of wildlife habitat is within the BLM and the Forest Service's multiple-use mandate and is properly a resource to be managed in their planning decisions.</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
DR-MTDK-BL-13-0277-7	NEPA	Could you give a complete listing of all the substances that BLM might give a materials lease for extraction under a 1916 Stockraising Homestead Patent?	N	Thank you for your comment. Non-substantive
DR-MTDK-BL-13-0277-8	NEPA	In Appendix M, BLM attempts to describe the coal estate which it owns. In many cases the exploratory work for its coal estate was done over 100 years ago, and the information obtained was not terribly complete. Some seams of coal have been fairly completely delineated before being put up for lease or trade	Y	Thank you for your comment. Appendix M and Chapter 3-Coal are being updated.
DR-MTDK-BL-13-0283-1	Air	Chapter 3, Figure 3-2 provides ambient air quality concentrations in the Planning Area for years 2009-2011. Although data are included for the 1-hour and 24-hour SO ₂ , National Ambient Air Quality Standards (NAAQS). footnotes 13 and 14 seem to indicate that 3-hour and annual data are also available. We recommend including the 3-hour and annual data in this Figure. In addition, the 1-hour SO ₂ , concentration presented in Figure 3-2 is at 105% of the NAAQS. On p. 3-9, it is noted that the Montana Department of Environmental Quality (MDEQ) reported high monitored 1-hour SO ₂ , concentrations during 2010 due to "events that are not likely to be repeated in future years." We recommend expanding this discussion to explain these "events- and why they would not be repeated	Y	The footnotes have been revised and data have been updated to reflect years 2010-2012. The BLM refers readers to the MDEQ for additional information concerning SO ₂ events associated with industrial sources permitted by the MDEQ. Modeling results for the 3-hour SO ₂ NAAQS have been included in Section 4.1.1.3.1.
DR-MTDK-BL-13-0283-10	Air	Appendix Y, Emissions Inventories, provides slightly different emissions inventory totals as compared to those presented in the ARTSD. In particular, the PM ₁₀ and PM _{2.5} emissions associated with Oil and Gas development appear more substantive. We recommend reconciling the two documents or explaining the differences	Y	Emission inventories were updated and the revised emission estimates are included in Sections 4.1.2.3-4.1.2.6, Appendix Y, and in the ARTSD.
DR-MTDK-BL-13-0283-11	Air	It is important that the emissions controls and mitigation measures used to develop the emissions inventory be included as required mitigation measures for activities under the RMP. The alternative-specific emissions inventory includes an 84% control efficiency of gravel or scoria surfacing for calculating dust emissions. The ARTSD, p. 6, identifies assumptions used in this emissions inventory, including a 50% fugitive dust control efficiency but no mention of this 84% control with gravel or scoria. If 84% surfacing control was used in the near-field modeling, then we recommend that this control efficiency be added to the identified assumptions on p. 6 of the ARTSD and that gravel/scoria surfacing be added to the initial mitigation list of the ARMP., Section 6.1	N	The AERMOD emission inventory was based on a 50 percent fugitive dust control efficiency, which is a conservative estimate, while the alternative-specific emission inventories included 84% reflecting gravel or scoria surfacing which is standard practice in the planning area. The suggested change regarding receptor layout was incorporated into Section 4.1.1.3.1. Annual comparisons to the NAAQS and MAAQS were provided in this section for those pollutants with annual averaging times
DR-MTDK-BL-13-0283-12	Air	recommendations for clarification of the ARTSD, as follows: pp. 14-15-" Figure 1 illustrates the well pad and receptor layout for PM ₁₀ and PM _{2.5} modeling. Please clarify whether this same receptor layout was used for the other criteria pollutants. p. 19 - Predicted criteria air pollutant concentrations were compared to the NAAQS, MAAQS, and Prevention of Significant Deterioration increments. For disclosure purposes, we recommend the annual comparisons for the NAAQS and MAAQS be discussed in this paragraph	N	The AERMOD emission inventory was based on a 50 percent fugitive dust control efficiency, which is a conservative estimate, while the alternative-specific emission inventories included 84% reflecting gravel or scoria surfacing which is standard practice in the planning area. The suggested change regarding receptor layout was incorporated into Section 4.1.1.3.1. Annual comparisons to the NAAQS and MAAQS were provided in this section for those pollutants with annual averaging times
DR-	Water	Given the potential and existing groundwater use in the region, it is important to	y	previous comment responses regarding SWPAs and the new stipulation to

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
MTDK-BL-13-0283-13		characterize the groundwater resources within the Planning Area. We recommend expanding the discussion in the Final RMP/EIS to include the following information: A description of all aquifers in the study area, noting which aquifers are Underground Sources of Drinking Water (USDWs). Federal Safe Drinking Water Act regulations define a USDW as an aquifer or portion thereof: (a)(1) which supplies any public water system; or (2) which contains a sufficient quantity of ground water to supply a public water system; and (l) currently supplies drinking water for human consumption; or (ii) contains fewer than 10,000 mg/1 total dissolved solids; and (h) which is not an exempted aquifer (See 40 CFR Section 144.3); Maps depicting the location of sensitive groundwater resources such as: municipal watersheds, source water protection zones (available from the Montana Department of Environmental Quality-MDEQ, Joe Meek, see contact information below), sensitive aquifers, and recharge areas; and description of and locations of groundwater use (e.g., public water supply wells, domestic wells, springs, and agricultural and stock wells)		protect them address this comment. Generally, MT DEQ provides standards and guidance in managing activities that could impact drinking water resources, which the BLM complies with through various agreements/MOUs. A SWPA stipulation has been developed. It stipulated NSO within SWPAs, with the objective to: "To protect human health by minimizing the potential contamination of public water systems. Source water is untreated water from streams, rivers, lakes, or aquifers used to supply public water systems. Ensuring that source water is protected from contamination can reduce the costs of treatment and risks to public health. This stipulation would protect the State-designated Source Water Protection Areas that protect public water systems from potential contamination."
DR-MTDK-BL-13-0283-14	Water	The Draft RMP/EIS states that no current, comprehensive quantification or quality measurements have been made for groundwater in the Planning Area. Page 3-39 notes that "the following guidance" sets forth foundations for BLM management of aquatic resources, but no discussion of such guidance follows: We recommend the Final RMP/EIS include disclosure of any future plans for gathering groundwater data in the Planning Area and discussion of the referenced guidance	n	The BLM does not plan to gather comprehensive planning area ground water data. If a Plan Of Development is submitted that would warrant data collection, it would occur. The "guidance" is referring to a number of plans and recommendations from BMPs to state and federal water quality standards. To clarify, the paragraph referred to will be written as: "Best management practices, state and federal guidance concentrate on protecting water resources, which sets the foundation for BLM management of both surface and groundwater resources."
DR-MTDK-BL-13-0283-15	Water	The EPA recommends that the Final RMP/EIS analyze potential impacts to groundwater quality and quantity related to oil and gas well drilling, including leaks and spills; associated production and disposal of produced water, including potential use of pits, underground injection control (UIC) wells, and evaporation ponds; impacts associated with production wellbore integrity and pipeline use; and impacts associated with restimulation and abandonment of existing wells. The EPA also recommends that the Final RMP/EIS discuss measures the BLM will require at the project level to minimize the potential for these impacts to occur. Appropriate groundwater protection measures can vary depending on hydrologic conditions and the presence of drinking water resources. Depending on the level of oil and gas development, lease stipulations may be necessary due to the disproportionate effect on water resources from such development	y	The commenter states, "Appropriate groundwater protection measures can vary depending on hydrologic conditions and the presence of drinking water resources. Depending on the level of oil and gas development, lease stipulations may be necessary due to the disproportionate effect on water resources from such development." Relevant to this, the BLM cannot address every potential specific issue that may arise throughout the field office in a programmatic document such as this RMP. The impacts mentioned will be, if scoping identifies them, analyzed at the project level during NEPA analysis. A series of stipulations are available to managers to minimize impacts to water resources. Additionally, since this draft was produced, a new stipulation has been developed to conserve water quality in Source Water Protection Areas (SWPA). An NSO for all SWPAs is stipulated. SWPAs were identified by MT DEQ data.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
				Concerning municipal water supplies, MT DEQ regulates activities with potential to affect municipal water supplies. The BLM works under an MOU to follow MT DEQ guidelines in these circumstances.
DR-MTDK-BL-13-0283-16	Water	BLM analyze and disclose potential groundwater protection, monitoring and mitigation measures, including: BMPs and other mitigation measures such as closed loop drilling, monitoring of water quality and water levels, closure and monitoring of reserve pits, and lining and monitoring of evaporation ponds; Setback stipulations, such as No Surface Occupancy (NSO), to minimize the potential for impacts to potential drinking water resources, including domestic water wells and public water supply wells. EPA recommends a minimum 500-foot setback for private wells. Setbacks are effective health and environment protection tools because they provide an opportunity for released contaminants to attenuate before reaching a water supply well. They may also afford an opportunity for a release to be remediated before it can impact a well, or for an alternate water supply to be secured, We note that the North Dakota Oil and Gas Commission has adopted a 500-foot setback from occupied dwellings (and by default, the associated domestic well); A mitigation plan for remediating future unanticipated impacts to drinking water wells, such as requiring the operator to remedy those impacts through treatment, replacement, or other appropriate means; and A general production well schematic that depicts the following: casing strings; cement outside and between the various casing strings; and the relationship of the well casing design to potentially important hydro-geological features such as confining zones and aquifers or aquifer systems that meet the definition of a USDW. Discuss how the generalized design will achieve effective isolation of USDWs from production activities and prevent migration of fluids of poorer quality into zones with better water quality	y	<p>The commenter states, "Appropriate groundwater protection measures can vary depending on hydrologic conditions and the presence of drinking water resources. Depending on the level of oil and gas development, lease stipulations may be necessary due to the disproportionate effect on water resources from such development." Relevant to this, the BLM cannot address every potential specific issue that may arise throughout the field office in a programmatic document such as this RMP. The impacts mentioned will be, if scoping identifies them, analyzed at the project level during NEPA analysis. A series of stipulations are available to managers to minimize impacts to water resources.</p> <p>Additionally, since this draft was produced, a new stipulation has been developed to conserve water quality in Source Water Protection Areas (SWPA). An NSO for all SWPAs is stipulated. SWPAs were identified by MT DEQ data.</p> <p>Concerning municipal water supplies, MT DEQ regulates activities with potential to affect municipal water supplies. The BLM works under an MOU to follow MT DEQ guidelines in these circumstances.</p>
DR-MTDK-BL-13-0283-17	Water	The EPA recommends the Final RMWEIS describe the current water quality conditions, if available, for each surface water body in the Planning Area, including perennial, intermittent and ephemeral streams, rivers, lakes, reservoirs, and surface water drinking water sources. The EPA also recommends the Final RMP/ EIS disclose the following information: A map and list of Clean Water Act (CWA) impaired or threatened water body segments within, or downstream of, the Planning Area, including the designated uses of the water bodies and the specific pollutants of concern; a map of municipal watersheds and designated source water protection zones; and Maps and descriptions of topography and soils, specifically steep slopes and fragile or erodible soils, especially near surface waters and intermittent/ephemeral channels	n	Oil and Gas leasing EAs (NEPA) will identify SWPAs with regard to proposed parcels, making developers and resource managers aware of potential issues. The EA will analyze the impacts of leasing parcels to SWPAs. The commenter states, "Appropriate groundwater protection measures can vary depending on hydrologic conditions and the presence of drinking water resources. Depending on the level of oil and gas development, lease stipulations may be necessary due to the disproportionate effect on water resources from such development." Relevant to this, the BLM cannot address every potential specific issue that may arise throughout the field office in a programmatic document such as this RMP. The impacts mentioned will be, if scoping identifies them, analyzed at the project level during NEPA analysis. A series of stipulations are available to managers to minimize impacts to water resources.
DR-MTDK-BL-13-0283-	Water	We recommend that the Final RMP/EIS be updated to reference Montana's 2012 Clean Water Act (CWA) Section 303(d) Impaired Waters List, as approved by the EPA, and discuss water quality trends to more fully describe current	n	The BLM uses its own data, as well as MT DEQ data, to evaluate water quality of given water bodies when needed. Riparian evaluations and MT DEQ 303d lists are used in conjunction to determine management needs for various water

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
19		conditions in, and downstream of, the Planning Area. We recommend this discussion include a description of any Total Maximum Daily Loads completed by MDEQ for streams in the Planning Area. in addition, if MDEQ has not assessed the water quality in all water bodies within the Planning Area, then we recommend that the Final RMP/EIS list such water bodies and indicate that the water quality condition has not yet been assessed by MDEQ		<p>resources.</p> <p>A list of impaired water bodies is present in Chapter 3 of the draft document. The MT DEQ 303d list, easily accessible on their website, has maps and descriptions depicting available information regarding water quality and impaired water resources throughout the Billings Field Office, and the state of MT.</p> <p>Source water protection areas (including municipal watersheds) have been identified. A new stipulation places an NSO within an SWPA to protect drinking water resources in the planning area.</p> <p>A steep slope and erodible soil layer has been developed for the field office with a new "sensitive soil" stipulation that places a CSU on areas with sensitive soils. The CSU requires an approved plan to avoid or mitigate impacts to resources from development on sensitive soils.</p> <p>Impacts from soil disturbance, especially near surface waters, is covered by three stipulations, including the new sensitive soils CSU, the 300' CSU for riparian and water setbacks, and the water/ riparian NSO.</p> <p>TMDLs and subsequent monitoring are controlled by MT DEQ, with BLM contributing data as available. When NEPA analysis of proposed projects identify issues pertaining to water quality, the BLM determines assessment and monitoring needs to maintain or improve water quality.</p>
DR-MTDK-BL-13-0283-2	Air	BLM conducted near-field modeling to disclose potential impacts to the NAAQS in the Planning Area. However, it appears that the 3-hr SO ₂ NAAQS analysis was omitted from the near-field modeling runs for the Draft RMP/EIS although it was included in the modeling protocol agreed to through the AQTW. Given the presence of the Laurel SO ₂ Nonattainment Area within the Planning Area. it is particularly important that BLM disclose potential impacts to the 3-hr SO ₂ NAAQS	y	Modeling results for the 3-hr SO ₂ standard were added to Section 4.1.1.3.1.
DR-MTDK-BL-13-0283-20	Water	The Draft RMP/EIS notes that increased sediment from surface disturbance may degrade water quality. Because sediment loading has already caused impairment of water bodies in the Planning Area, and future activities that may be authorized under this RMP, including oil and gas development, livestock grazing and use of off-highway vehicles (which is expected to double by 2015), would result in surface disturbance that may contribute to erosion impacting watersheds, it is important the Final RMP/EIS include additional information about this concern. It is difficult to determine from the Draft RMP/EIS, Chapter 3, Affected Environment, whether the Planning Area contains sensitive soils, but it	y	<p>A Sensitive Soils layer has been developed and a new sensitive soils stipulation, a CSU, has been drafted. The description of the sensitive soils will be inserted into the soils section in Ch. 3.</p> <p>In BiFO, a large proportion of sensitive soils are in arid regions with distant proximity to any surface waters, minimizing the impact these disturbances would have on water resources.</p> <p>Threats to water quality from sedimentation, due to various activities, is</p>

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		<p>does note that some soils in the Planning Area have high susceptibility to erosion. Because erodible soils could represent a source of pollutants in the Planning Area, we recommend the Final RMP/EIS include a map depicting areas of steep slopes and fragile or erodible soils and proximity to surface waters</p>		<p>addressed on the project level through NEPA analysis. For oil and gas development, stipulations help minimize these impacts. For livestock grazing, Land Health Standards and Guidelines are used to promote water quality through protecting riparian health.</p> <p>Comprehensive travel management is being conducted and analyzes and addresses impacts from OHV travel to water quality.</p>
<p>DR-MTDK-BL-13-0283-21</p>	<p>Water</p>	<p>Oil and Gas Leasing Stipulations to Protect Water Resources: The Draft RMP/EIS includes two different descriptions of the water resource protections provided by the Preferred Alternative through oil and gas leasing stipulations. Specifically, the Draft RMP/EIS Chapter 2, p. 2-49, and Chapter 4, p. 4-101, describe the Preferred Alternative to include a NSO stipulation within 300 feet of riparian areas, wetlands, 100 year floodplains, water bodies and perennial streams. However, Appendix C, Oil and Gas Stipulations, indicates that the Preferred Alternative proposes the following stipulations: NSO - "Surface occupancy and use is prohibited within perennial or intermittent streams (as indicated by obligate wetland species or hydric soils); lakes, ponds, and reservoirs; floodplains; wetlands; and riparian areas." in addition, a Controlled Surface Use (CSU) stipulation is proposed to ensure that special operating procedures are required within 300 feet of riparian and/or wetland areas. We recommend that the inconsistency be resolved in the Final RMP/EIS and also suggest several modifications to enhance and clarify the water resource protections. If the Appendix C proposed stipulations are the intended version: We recommend against using "obligate wetland species or hydric soils" as indicators for intermittent streams, since this will result in an unnecessarily narrow definition of intermittent stream that would likely result in excluding many of these streams from protection. We recommend further clarification of the "streams" language by including ephemeral streams in the list of water resources to be protected by the NSO stipulation. This is important because the Draft RMP/EIS identifies 1,002 miles of perennial, intermittent, and ephemeral streams in the Planning Area. We recommend clarifying the NSO language to be applicable to "100-year floodplains" in order to provide certainty for operators</p>	<p>n</p>	<p>The consistency for water and riparian stipulations have been addressed and are represented accurately in the text of the document and in Appendix C, where stips are described. There will be a water/riparian/floodplain NSO and a 300' CSU.</p> <p>When parcels are nominated for leasing, resource specialists conduct GIS investigations and if necessary site visits to determine what resources may be impacted if the lease is developed. During these investigations, the drainages in the area will be classified as perennial, intermittent or ephemeral, depending on many characteristics. If a riparian obligate species is present in a dry channel, it will be classified as intermittent. Soil surveys indicating hydric soils will also result in intermittent classification. Office personnel, with local expertise often times have knowledge of flow regimes in drainages as well, which can supplement on the ground investigations and data queries.</p> <p>Ephemeral drainages are runoff channels, only flowing in direct response to precipitation events and/or snowmelt. Except in gentle terrain, ephemeral drainages are simply too numerous and rarely active to afford the same protections as intermittent and perennial streams. During the permitting process, ephemeral drainages that are recognized as a potential problem for water quality issues will be identified and conditions will be put on the permit to minimize issues that may arise due to the proximity of development to the ephemeral channel.</p> <p>100 year floodplains will be used in place of "flood plains".</p> <p>The WEMs for the water and riparian resources stipulation were developed with regard to "protecting the unique biological and hydrological features and functions associated with perennial and intermittent streams, lakes, ponds, reservoirs, floodplains, wetlands, and riparian areas."</p> <p>Resource managers have discussed the appropriateness of NSO vs CSU for these riparian/water setbacks. Within the MT/Dakota BLM, it was decided that the 300 foot CSU would meet resource objectives. The MT DEQ 303d list of</p>

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				impaired waters shows only two streams that are impaired with oil and gas development as the causal factor. There is very little reference material supporting specific setback distances as most effective at mitigating impacts from oil and gas development. With the minimal impact documented in the state, and the CSU stipulation requiring a development plan that ensures resource objectives will be met, a CSU is deemed acceptable in protecting water resources.
DR-MTDK-BL-13-0283-22	Water	We recommend removing the exceptions clause from the NSO stipulation given the importance of preventing disturbance within water bodies and wetland areas. In reviewing numerous oil and gas leasing stipulations contained in other BLM EISs, we have not seen an exception process to allow drilling within water bodies or wetlands. It is our understanding that a "no exceptions approach" within a water body or wetland is BLM's standard procedure	n	<p>The consistency for water and riparian stipulations have been addressed and are represented accurately in the text of the document and in Appendix C, where stips are described. There will be a water/riparian/floodplain NSO and a 300' CSU.</p> <p>When parcels are nominated for leasing, resource specialists conduct GIS investigations and if necessary site visits to determine what resources may be impacted if the lease is developed. During these investigations, the drainages in the area will be classified as perennial, intermittent or ephemeral, depending on many characteristics. If a riparian obligate species is present in a dry channel, it will be classified as intermittent. Soil surveys indicating hydric soils will also result in intermittent classification. Office personnel, with local expertise often times have knowledge of flow regimes in drainages as well, which can supplement on the ground investigations and data queries.</p> <p>Ephemeral drainages are runoff channels, only flowing in direct response to precipitation events and/or snowmelt. Except in gentle terrain, ephemeral drainages are simply too numerous and rarely active to afford the same protections as intermittent and perennial streams. During the permitting process, ephemeral drainages that are recognized as a potential problem for water quality issues will be identified and conditions will be put on the permit to minimize issues that may arise due to the proximity of development to the ephemeral channel.</p> <p>100 year floodplains will be used in place of "flood plains".</p> <p>The WEMs for the water and riparian resources stipulation were developed with regard to "protecting the unique biological and hydrological features and functions associated with perennial and intermittent streams, lakes, ponds, reservoirs, floodplains, wetlands, and riparian areas."</p> <p>Resource managers have discussed the appropriateness of NSO vs CSU for these riparian/water setbacks. Within the MT/Dakota BLM, it was decided that the 300 foot CSU would meet resource objectives. The MT DEQ 303d list of</p>

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				impaired waters shows only two streams that are impaired with oil and gas development as the causal factor. There is very little reference material supporting specific setback distances as most effective at mitigating impacts from oil and gas development. With the minimal impact documented in the state, and the CSU stipulation requiring a development plan that ensures resource objectives will be met, a CSU is deemed acceptable in protecting water resources.
DR-MTDK-BL-13-0283-23	Riparian/wetlands	the EPA recommends BLM consider revising the Appendix C Preferred Alternative CSU setback for riparian and wetland areas to a 500 foot NSO setback for perennial, intermittent and ephemeral streams, lakes, ponds, reservoirs, riparian and wetland areas. Other BLM Field Offices have required a 500 foot setback to minimize potential deterioration of water quality and to maintain natural hydrologic function of stream channels, stream banks, floodplains, and riparian communities (e.g., see Grand Junction Field Office Draft RMP/EIS, NSO-1, Major River Corridors; NSO-2, Streams/Springs). We also recommend adding "springs" to the list of water resources protected by these stipulations in order to maintain proper function of these susceptible resources (e.g., see Grand Junction Field Office, NSO-4, Lentic Riparian Areas - " which includes springs, seeps and fens).	y	Thank you for your comment. We have considered your suggestion and altered our preferred alternative to include both an NSO and a CSU.
DR-MTDK-BL-13-0283-24	Livestock Grazing, veg-rangelands	We understand from conversations with the BLM Miles City Field Office that BLM's process is to prepare environmental assessments to assess the effects of alternatives developed to ensure that Rangeland Health Standards are met through grazing allotment goals and objectives. If livestock grazing levels or practices are a significant factor in failing to meet Rangeland Health Standards, the BLM has committed to take action no later than the start of the next grazing year to initiate progress toward meeting the Standards. Since such action must be taken quickly, we recommend that the Final RMP/EIS include a list of potential measures that could be implemented at the project level to meet Rangeland Health Standards. This list could include measures that the BiFO has taken in the past, as well as the following suggestions: Require special protections for high quality wetland resources such as springs and fens. Such protections might include development of alternative water sources, fencing to exclude livestock from a spring source, and redirection of spring water to a trough for watering; To avoid possible infiltration of groundwater with contaminants resulting from congregation of livestock, require adequate separation between a livestock water well and a water trough or tank; Specify steps to protect and/or repair any existing exclusions and upland water developments, and develop new range improvements to protect water resources; Monitor impacts from grazing adjacent to high value water resources; Adjust the timing of grazing by delaying Spring turnout, increasing rotation, and focusing grazing on areas less intensely used in the previous year;	n	Grazing does have the potential to impact water resources, and BLM is committed (required by regulation) to take action before the start of the next grazing season if it is determined that an allotment is failing to achieve one or more of the standards, and livestock grazing has been determined to be a causal factor. Guidelines (Volume III, Appendix I) have been developed to address many of the common causal problems associated with land health standards and livestock grazing. These guidelines are typically selected, analyzed, and if appropriate implemented following site specific NEPA analysis at the appropriate level (pasture, allotment, area, or watershed). These guidelines may be used independently and/or in conjunction with others. The existing guidelines incorporate many of the potential remedy measures you suggest as well as others. Because site specific conditions may vary widely among allotments, there is no comprehensive list approach that will address problems in all situations. In addition "Other Terms and Conditions" are commonly applied to grazing authorizations to facilitate site specific management and unique circumstances. The use of adaptive management is commonly implemented on a site specific basis and has been addressed in this document. Monitoring and evaluation is typically scheduled based on the management category of an allotment. The current management category of specific

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		and Develop a monitoring plan and schedule to assess effectiveness of range improvements in protecting aquatic resources		allotments can be found in Volume III, Appendix S. Proposed changes to management category by alternative can be found in Volume I, Table 2-6.2, Pg. 2-118. As directed by existing policy, should an allotment be determined to not be meeting the water quality standard and livestock grazing is determined to be a causal factor, the allotment would be re-categorized to an "I" management category which would prioritize that allotment for monitoring and evaluation.
DR-MTDK-BL-13-0283-25	NEPA	In addition, we recommend the Final RMP/EIS identify the general features of an effective adaptive management plan that could be employed at the project level, including the following: Decision tree with achievable and measurable objectives to provide accountability and guide future decisions; Specific decision thresholds with identified indicators for each impacted resource; Targets that specify a desired future condition; Commitment to implement and fund a monitoring plan with protocols to assess whether thresholds are being met; Commitment to use monitoring results to modify management strategies as necessary; and Designated timeframes for completion of necessary management modifications	Y	Thank you for your comment. Beyond the scope of this document (implementation level planning)
DR-MTDK-BL-13-0283-26	NEPA	We recommend clarifying Appendix 0 and the Final RMP/EIS, Section 1.4.1. I., Travel Management Planning, to confirm that site-specific NEPA analyses will be conducted for individual Travel Management Plans	N	Thank you for your comment. As per BLM Handbook H-8342-1 and Travel and Transportation Manual 1626, Section 1626, site specific analyses will be conducted for travel management plans. Text has been changed in 1.4.3.1.2 to address your concerns.
DR-MTDK-BL-13-0283-27	Water	In order to ensure that public drinking water supply sources (e.g., surface water sources, including groundwater under the direct influence of surface water (GWUDISW) sources, and groundwater sources) are protected from potential impacts associated with BLM-authorized activities in the Planning Area, it is important to identify where these sources are located. Therefore, the EPA recommends that the Final RMP/EIS include a map delineating source water protection areas for public water supply wells. Please contact Joe Meek, MDEQ, via the contact information below for a map of the Public Water Supply Inventory Regions in the BiFO. We also recommend identifying reservoirs that are drinking water sources and disclosing potential impacts to these sources	y	Additionally, since this draft was produced, a new stipulation has been developed to conserve water quality in Source Water Protection Areas (SWPA). An NSO for all SWPAs is stipulated. SWPAs were identified by MT DEQ data.
DR-MTDK-BL-13-0283-28	Water	In order to ensure public drinking water supply sources (e.g., surface water sources, including GWUDISW sources, and groundwater sources) are protected from potential impacts associated with oil and gas leasing, the EPA recommends the following NSO language: Municipal Supply Watersheds- NSO within any of the following areas, as deemed appropriate by the BLM: The entire watershed; or Local Source Water Protection Planning Areas where delineated in a Source Water Protection Plan; or Surface Water Spill Response Region or Groundwater Inventory Region defined by Source Water Assessments that have been delineated or evaluated by the State Surface Water Spill Response Regions are 'A-mile-wide zones (on both sides of rivers or streams, upstream of drinking water intakes. They include the water body with the surface water intake and	y	A SWPA stipulation has been developed. It stipulated NSO within SWPAs, with the objective to: "To protect human health by minimizing the potential contamination of public water systems. Source water is untreated water from streams, rivers, lakes, or aquifers used to supply public water systems. Ensuring that source water is protected from contamination can reduce the costs of treatment and risks to public health. This stipulation would protect the State-designated Source Water Protection Areas that protect public water systems from potential contamination." Oil and Gas leasing EAs (NEPA) will identify SWPAs with regard to proposed parcels, making developers and resource managers aware of potential issues.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		significant tributaries, for 10 miles upstream of the drinking water intake. For lakes and reservoirs, they include a 'A-mile-wide zone around the water body Groundwater Inventory Regions are based on a three-year time of travel or a fixed radius of 1,000 feet (concentric buffer) around the public water supply well		The EA will analyze the impacts of leasing parcels to SWPAs
DR-MTDK-BL-13-0283-29	Water	For surface water sources, if the Municipal Supply Watersheds NSO stipulation is not deemed feasible by the BLM, then at a minimum we recommend a 1000-foot NSO or CSU setback on both sides of the river or stream, for 10 miles upstream of the intake. For lakes and reservoirs, this would include a 1000-foot NSO or CSU setback around the water body. For groundwater and GWUDISW sources, if the Municipal Supply Watersheds NSO stipulation is not deemed feasible by the BLM, we recommend a minimum 1,000-foot CSU concentric buffer for these sources. We make this recommendation based on consultation with Joe Meek, the Source Water Protection Program Manager with the MDEQ. He may be contacted for additional information at 406-444-4806 or jmeek@mt.gov.	y	A SWPA stipulation has been developed. It stipulated NSO within SWPAs, with the objective to: "To protect human health by minimizing the potential contamination of public water systems. Source water is untreated water from streams, rivers, lakes, or aquifers used to supply public water systems. Ensuring that source water is protected from contamination can reduce the costs of treatment and risks to public health. This stipulation would protect the State-designated Source Water Protection Areas that protect public water systems from potential contamination." Oil and Gas leasing EAs (NEPA) will identify SWPAs with regard to proposed parcels, making developers and resource managers aware of potential issues. The EA will analyze the impacts of leasing parcels to SWPAs
DR-MTDK-BL-13-0283-3	Air	The Air Resources Technical Support Document (ARTSD), p. 6, states that Tier 4 emission standards were assumed in the Draft RMP/EIS near-field modeling analysis in order to demonstrate compliance with the 1-hr NO2 NAAQS. We note that the ARMP, Section 6.1, initial mitigation requirement for diesel drill rig engines >200 hp to meet Tier 4 emission standards for non-road diesel engines indicates that "oil and gas operators may use drill rig engines that exceed Tier 4 emission standards if modeling demonstrates compliance with the NAAQS and protection of AQRVs." We assume that this caveat means that additional near-field modeling will be required at the project-level if higher-emitting engines will be used. We recommend the Final RMP/EIS and ROD include this commitment	Y	See the discussion in Appendix T, Section 6.1. Text has been modified to state that modeling or monitoring may be used to demonstrate compliance if non-Tier 4 engines are used. Demonstrations may be made at the project level or at a programmatic level.
DR-MTDK-BL-13-0283-30	Water	The EPA also recommends the BLM include a commitment in the Final EIS and ROD to provide notice to lessees regarding these important areas in the Planning Area. Lease notices for drilling within Source Water Protection (SWP) Zones of public water supplies are now being used for all wells drilled under BLM authority within SWP Zones in Utah	y	SWPA Stipulation established.
DR-MTDK-BL-13-0283-31	Water	The Draft RMP/EIS indicates that although only 3.5% of the Planning Area is comprised of riparian and wetland areas, the importance of the riparian zone to water quality and quantity is recognized. With this in mind, we recommend clarifying p. 3-55 to describe "the following guidance" that is referenced for setting the foundation for BLM management of riparian habitat, function and water quality	n	The BLM does not plan to gather comprehensive planning area ground water data. If a Plan Of Development is submitted that would warrant data collection, it would occur. The "guidance" is referring to a number of plans and recommendations from BMPs to state and federal water quality standards. To clarify, the paragraph referred to will be written as: "Best management practices, state and federal guidance concentrate on protecting water resources, which sets the foundation for BLM management of

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
				both surface and groundwater resources.”
DR-MTDK-BL-13-0283-32	Water	Springs often contain rare or unique plant and animal species in addition to being important contributors to hydrologic function. Therefore, the EPA recommends that the RMP include a commitment for further analysis of springs at the project level, including evaluation of function or condition prior to authorizing any activities in these areas. To ensure that springs, as well as perennial seeps and wetlands, are identified to facilitate their protection, we recommend delineation and marking of perennial seeps, springs and wetlands on maps and on the ground before development.	n	Concerning municipal water supplies, MT DEQ regulates activities with potential to affect municipal water supplies. The BLM works under an MOU to follow MT DEQ guidelines in these circumstances. Springs are included in riparian assessments and are afforded the protections any riparian area is. Will check text to ensure this is clear. Will update if needed.
DR-MTDK-BL-13-0283-33	Water	We recommend expanding the Final RMP/EIS Chapter 4 discussion of potential mitigation measures that may be applicable at the project level for oil and gas construction, drilling and production activities to prevent adverse impacts to these aquatic resources. These could include silt fences, detention ponds and other stormwater control measures. Other potential mitigation measures, including oil and gas leasing stipulations and measures to protect water resources front grazing impacts, are discussed above under Surface Water Mitigation	n	Thank you for the comment. The RMP includes appendices that describe Best management practices, which are used to mitigate impacts from activities on federal lands, including oil and gas development and livestock grazing. These BMPs and related practices to conserve natural resources are constantly being developed and added to the tool box.
DR-MTDK-BL-13-0283-34	Water	Water demand associated with the drilling and completion of new wells in the Planning Area is an important consideration that will benefit from analysis and disclosure. Although the oil and gas reasonably foreseeable development (RFD) for the Planning Area is relatively low, the Draft RMP/EIS notes that (a) depletion of surface water in the Planning Area watersheds may affect major rivers, including the Yellowstone, and (b) produced water from oil and gas development may affect groundwater. We recommend that the Final RMP/ EIS include a general discussion of the following: Based on predicted well depths, formation characteristics, and well designs (and fracturing operations, if used), estimate a range of water demand per well developed in the Planning Area; Possible sources of water needed for oil and gas development; and Potential impacts of the water withdrawals (e.g., drawdown of aquifer water levels, reductions in stream flow, impacts on aquatic life, wetlands, and other aquatic resources).In addition, the EPA recommends the Final RMPOEIS include a general discussion of how flow back and produced water will be managed including: Estimated volume of produced water per well; Options and potential locations for managing the produced water (i.e., UIC wells, evaporation ponds, and surface discharges); Possible target injection formations, formation characteristics and depth of any UIC wells; and Potential impacts of produced water management	n	The level of development seen and forecasted in the BiFO precludes a need for detailed analysis of these issues. As development occurs, NEPA analysis of proposed projects would identify issues that may affect the environment and determine the impacts thereof. Attempting to analyze these impacts preemptively is not feasible due to the wide range of conditions coupled with the low forecast for development. The scenarios are too varied concerning geology and development location. In the event a large development is proposed, a thorough and detailed analysis would be conducted of issues that are identified through internal and external scoping. These issues are not within the scope of this RMP level document.
DR-MTDK-BL-13-0283-35	NEPA	A general framework for implementation and monitoring of the RMP is provided in Appendix X. Implementation and Monitoring. We recommend expanding this appendix, similar to the Miles City Draft RMP example, to include detailed monitoring measures and identification of frequency, remedial action triggers	Y	Thank your for your comment. Beyond the scope of this document (implementation level planning)

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		and management options		
DR-MTDK-BL-13-0283-36	Water	the EPA recommends that BiFO require all BLM authorized oil and gas multi-well projects to conduct groundwater and surface water monitoring, similar to RMP requirements included by other BLM Field Offices, e.g., White River and Grand Junction in Colorado. To that end, we recommend that the Final RIM/EIS describe the components of water resource monitoring that will be expected of new projects in the Planning Area, including how water quality monitoring will occur prior to, during, and after such development to detect impacts to both surface water and groundwater resources, including private wells. The EPA encourages BLM to include monitoring frequency expectations to ensure water quality changes are detected in a timely fashion to address any increased pollutant levels in streams and to verify expected improvements from changes in management practices. Streams could be prioritized for monitoring frequency where some streams (e.g., 303(d) listed impaired water bodies) would receive yearly or seasonal monitoring and other streams would be monitored much less frequently. Evaluations of water quality could also follow this time schedule as appropriate. A recent example of a water quality monitoring plan is the "Long-Term Plan for Monitoring of Water Resources" developed by BLM for the Gasco Energy Inc. Uinta Basin Natural Gas Development Project Final EIS2. Also, the National Ground Water Association's Water Wells in Proximity to Natural Gas or Oil Development Brief provides information on the importance of baseline sampling for private wells and types of analysis recommended.	n	<p>The level of development seen and forecasted in the BiFO precludes a need for detailed analysis of these issues. As development occurs, NEPA analysis of proposed projects would identify issues that may affect the environment and determine the impacts thereof. Attempting to analyze these impacts preemptively is not feasible due to the wide range of conditions coupled with the low forecast for development. The scenarios are too varied concerning geology and development location.</p> <p>In the event a large development is proposed, a thorough and detailed analysis would be conducted of issues that are identified through internal and external scoping. These issues are not within the scope of this RMP level document.</p>
DR-MTDK-BL-13-0283-37	WSR	Draft RMP/EIS, Chapter 4, Environmental Consequences, notes that the Preferred Alternative would recommend two of the eligible segments as suitable, and the other eligible segments would be determined non-suitable (and no longer afforded management protection for wild and scenic purposes). We recommend that the Final RMP/EIS disclose how the suitability analysis was conducted and how the suitability determinations were made. In addition, we recommend revising Map #165, Eligible Wild and Scenic Rivers, to include identification of segments with proposed suitability determinations	n	Thank you for your review of the draft RMP and your comments. The BIFO did do a Suitability Study as part of this planning effort. It appears that the document was inadvertently left out of the document. It has been inserted into Appendix R, after the Eligibility Study Report.
DR-MTDK-BL-13-0283-38	WSR	We also recommend that the Final RMP/EIS ensure consistency between Chapter 4 and Appendix C, Oil and Gas Stipulations. Currently for the Preferred Alternative, page 4-442 identifies NSO within 0.5 mile of WSR-eligible and suitable segments, but Appendix C identifies NSO within 0.5 mile of WSR-eligible segments. We recommend using the same terminology in both sections to avoid any confusion	n	Thank you for the review of this document and your thoughtful comments. The text will be changed to ensure consistency between the mentioned sections of the document
DR-MTDK-BL-13-0283-39	Social/econ	The Draft RMP/EIS discloses that American Indians represent nearly 9% of the population in the Montana portion of the Planning Area with a high percentage living in poverty. Depending on the county, percentages of persons living below the poverty level in the Montana portion of the Planning Area range to 24%. The Environmental Consequences chapter of the Draft RMP/EIS states that no	n	Thank you for your comment. Environmental Justice is considered/analyzed during the project-level NEPA analysis.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		alternative will result in identifiable disproportionate effects specific to any minority or low income population or community. To confirm this determination, we recommend additional environmental justice analysis at the project-level stage of NEPA given the demographics of the area and the potential impacts from oil and gas development		
DR-MTDK-BL-13-0283-4	Air	To disclose BLM's intent, we recommend that the Final RMP/EIS include the following: Clarification regarding which mitigation measures were necessary to ensure compliance with the NAAQS; and An explanation as to why BLM believes requiring drill and completion engines >750 hp to meet Tier 4 generator set emission standards is not necessary to demonstrate compliance with the 1-hour NO2 NAAQS.	N	In response to an earlier EPA request under the MOU that larger drill rig and completion engines be modeled, the BLM modeled the largest engines expected to be operating in the planning area. Based on research and discussions with BLM fluid minerals staff, the BLM determined that these largest engines are generator set engines. Smaller non-generator set engines may be used for some wells. At the planning stage, the BLM cannot model every size/type engine combination that could conceivably be used. The BLM's approach is reasonable, but conservative, and predicts compliance with the NAAQS. Both generator set and non-generator set engines are subject to EPA's non-road diesel engine regulations. The BLM is requiring drill rig and completion engines to meet the most stringent EPA emission standards for both generator set and non-generator set engines, with the exception that future modeling or monitoring may demonstrate that the use of non-Tier 4 engines may be used if adequate air quality protection is demonstrated.
DR-MTDK-BL-13-0283-40	Air	Pursuant to draft Council on Environmental Quality (CEQ) guidance and Executive Order 13514, BLM has included an analysis and disclosure of greenhouse gas (GHG) emissions and climate change. We note that the GHG emissions inventory does not include oil and gas emissions from "downstream" activities such as refining that will occur outside the Planning Area. Because information on these "downstream" indirect GHG emissions from activities may be of interest to the public in obtaining a complete picture of the GHG emissions associated with BLM-authorized activity in the Planning Area, it may be helpful to estimate and disclose them	N	The BLM does not have sufficient information to estimate GHG emissions from downstream activities.
DR-MTDK-BL-13-0283-5	Air	the ARMP Section 6.2. Monitoring-Based Mitigation, indicates that prior to completion of the photochemical grid modeling (PGM) analysis, monitoring-based thresholds for determining enhanced mitigation would be based on evaluation of monitored exceedances of the NAAQS. However, in the discussion of modeling-based thresholds for evaluating enhanced mitigation (Section 6.3), it is stated that "potential future impacts" on NAAQS or Montana Ambient Air Quality Standards (MAAQS) will be considered. To provide clarity regarding the trigger and consistency within the ARMP, we recommend replacing this language with "NAAQS or MAAQS exceedances" predicted via future PGM	Y	See Appendix T. Section 6.3.1
DR-MTDK-BL-13-0283-6	Air	Section 1.5 of the ARMP includes a detailed discussion of requirements for oil and gas activities that were developed through the 2008 Montana Statewide Oil & Gas EIS (Statewide), some of which are being integrated into the BiFO ARMP. We note that two of the Statewide requirements that are not "carried forward"	N	Natural-gas-fired or electrical compressors or generators are included as initial mitigation in Appendix T, Section 6.1. Due to the low level of development in the planning area and a decrease in compression throughout the area, the requirement to maximize the number of wells connected to each compressor

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		into this ARMP are requirements to (1) maximize the number of wells connected to each compressor and (2) utilize natural gas fired or electrical compressors or generators. We recommend that BLM provide its rationale for discontinuing these emission-reducing requirements		has become a moot point.
DR-MTDK-BL-13-0283-7	Air	ARMP pp.T-11-12: We understand that BLM intends to run the PGM to cover the full 20 year planning cycle of the RMP rather than performing an initial PGM run followed by periodic reassessments as described in Section 5.1.2A on p. T-12. We recommend revising the text to clarify this point. In addition, we recommend revising Table 2, p. t-11 to include time in the schedule for the AQTW to review results from emissions modeling	Y	Suggested clarifications have been addressed in relevant portions of Appendix T.
DR-MTDK-BL-13-0283-8	Air	Section 6.2.3 indicates that following PGM completion, BLM would calculate design values for each pollutant monitored at a federal reference monitor within the Planning Area. For completeness, we suggest revising this language to include federal equivalent method monitors since data from these monitors could be used in an identical fashion to the data collected from federal reference monitors	Y	Suggested clarifications have been addressed in relevant portions of Appendix T.
DR-MTDK-BL-13-0283-9	Air	Section 6.2.4: After the PGM is completed, we recommend a 1-year timeline for implementation of measures after selection of enhanced mitigation, similar to the timeline provided for implementation of enhanced mitigation measures prior to PGM completion (see Section 6.2.2: "Selected mitigation measures would be implemented within one year after the BLM decision to apply additional mitigation").	Y	Suggested clarifications have been addressed in relevant portions of Appendix T.
DR-MTDK-BL-13-0284-1	Travel mgnt	ON roads or ATV routes that provide the primary or exclusive access to a section or more of BLM lands but are unavailable to public travel due to private landownership, we expect your agency to CLOSE THE ROUTE AT THE POINT IT ENTERS BLM LAND beyond the private land to travel except for certain administrative use. In the event of grazing or other special uses (other than outfitting) limited travel by the permit or lease holder can occur. Permitted travel must be confined to that deemed necessary to properly administer the operation covered by the permit or lease. No road or ATV route should be open to outfitters or to landowners who do not allow the public to use of that route to access BLM land. On roads that pass thru both public and private land that are critical for your agency to carry out its mandate (such as access for fire suppression and enforcement of laws such as the Antiquities Act) should be opened to your agency and the public as a result of the BLM filing a Prescriptive Easement in the name of the public. Don't claim you can't file Prescriptive Easements because we (PLWA) do it all the time. The Goetz Law firm says your agency can file a prescriptive easement the same as anyone else	n	Thank you for your comments. Regarding access to isolated parcels of public lands, the BLM designates Areas in its RMPs. Specific routes are addressed in the Travel Plan, which has a separate decision record than the RMP. Guidance for route decisions can be found in the BLM Manual 1626, Travel and Transportation. BLM can also consider access concerns during site specific NEPA actions and under a variety of programs, including the range, realty, and recreation Manuals.
DR-MTDK-BL-13-0287-1	Travel mgnt	First, I believe that all the current roads and trails that are closed to OHVs, remain closed to OHV traffic. If one looks at a road that has been closed for a few years, one can see nature beginning to return the road to a natural state.	n	Thank you for your comments. In regards to your comment, While statements of opinion (including agreement or opposition) do not require

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
				specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS
DR-MTDK-BL-13-0295-1	NEPA	The Billings and Pompeys Pillar RMP (BPPRMP), which includes travel management planning, is voluminous. The four RMP volumes are 5.5 inches thick and do not include the 2,549 on-line pages of Background & Supporting Material for Travel Plan, nor all necessary travel mapping. 40CFR part 1500.4 states "Agencies shall reduce excessive paperwork by: Reducing the length of environmental impact statements (1502.2), by means such as appropriate page limits (1501.7(b)(1) and 1502.7). The BPPRMP must fall into the excessive paperwork category. I've had trouble going through the material, the BLM staff had troubles finding things in the RMP when asked questions, and the average person has very little chance of making sense of the material. The time spent reviewing the material has been beyond ridiculous. We do not feel the spirit or intent of 40 CFR 1500.4 has been followed.	N	Thank you for your comment.
DR-MTDK-BL-13-0295-2	Travel mngt	Page 3-197 has a table entitled Estimated Number of Vehicles Used Off-Highway in Montana (1990-1998), which was used to project regional recreational use to 2015. The data is not only out of date but also makes some flawed conclusions.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS.
DR-MTDK-BL-13-0295-3	Travel mngt	-Route PM1023 is listed as an Open to 50" or Less route. This is a route used by all sized vehicles as not only a loop, but a cut across from Helt Road to Crooked Creek Road. If this is not changed, some visitors would have to go approximately twelve miles out of the way. -There is a switchback north of PM1023 which has been used for many years by many recreationists to go from Red Pryors Road to Crooked Creek Road. Reading your latest route numbered maps, it looks like it goes from PM1017 to PM1025. Alternative D shows the route as being closed. This is an important loop and access route which should be kept open.	n	Thank you for your comments. The BLM staff has reviewed your and others and several decisions have been altered, including the one for PM 1023. This route will be designated as "open" for all size vehicles, not just those less than 50" in width.
DR-MTDK-BL-13-0295-4	Travel mngt	-Routes PM1071 and PM1072 should be considered for opening to OHV travel. This is a connector loop which ties into Bear Canyon Road PM1067. Neither route indicates habitat or cultural issues. -Routes CW2024 and CW2025 should be open to motorized users. This would allow access to state land from the west and south for hunting purposes. Creating a positive future for off-highway vehicle recreation	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS In regards to the mentioned routes, (PM 1071 and 1072) the route inventory evaluated their use and determined that there are resource concerns and alternate routes more suited for OHV use. In regards to routes CW 2024 and CW 2025, the staff reviewed these decisions and determined that while both routes offer the same access CW 2024 offers the most advantageous access. The route will be designated as "open" for motorized use. Refer to map 146

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
DR-MTDK-BL-13-0299-1	Social/econ	In review of the BLM RMP/EIS being proposed it is clear your agency is not adequately considering the social and economic impact of the decision in any of the alternatives presented in the DRMP/EIS. It is common practice to use the IMPLAN (page 4-594) modeling system for analysis of social and economic impacts but this modeling analysis is highly dependent on the accuracy of the data input in order to generate any form of reliable output. It is clear your agency has used input data which is based on "assumptions, estimates, predictions, potentials, could be, may be, expected, approximately, and about" as all of these words are used throughout the report. The DRMP/EIS is full of these words and lacks sufficient supportable facts to make a justified decision to close vast acreages of federally managed BLM land in Montana. It appears the writer with or without management direction had a pre-conceived agenda to limit public access, mineral development and recreation use in this area. The writer states the conclusion then sets out to prove the assumption using a process of manipulating data or making existing scientific data support the pre-conceived conclusion. A report based upon "my opinion", "assumptions", "estimates", "predictions", "potential", "could be", "may be expected", "approximately" and "about" not supported by peer reviewed scientific studies has no credibility. It reads as though BLM is making a stock market offering by using forward looking statements. Where is the hard data? Typically agencies gather data from reliable sources such as interviews and information from local residents which the BLM has failed to do. I request your agency follow their own requirements and gather more reliable peer reviewed scientific studies to support the conclusion before completing the final RMP/EIS. Failure to gather true data on the social and economic impacts of this decision and to incorporate this information into the document would result in the decision being arbitrary and capricious.	N	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the B&PPNM RMP/EIS. The IMPLAN data are comprehensive - it includes data from both metropolitan and non-metropolitan areas. It is neither feasible nor desirable to conduct economic impact analyses on very small scales (e.g., zip code level) due to the economic linkages between communities. A small-scale IMPLAN analysis would fail to capture the labor and trade flows between communities and the economic consequences would be underestimated. As a result, consequences particular to small communities are addressed in the social analysis. The social analysis addresses environmental justice considerations on pg. 4-590, which describe the potential for disproportionately adverse effects on low income individuals and communities.
DR-MTDK-BL-13-0300-1	Social/econ	Because of your lack of accurate and peer reviewed input data into the IMPLAN modeling system. On page 4-589, under Impacts common, the DRMP/EIS makes the following statement: "No alternative would affect the major social trends or social organizations in the local communities of the planning area." And on page 4-590 under Environmental Justice, "no alternative considered would result in any identifiable disproportionate effects specific to any minority or low income population or community." How are you able to make these statements when the majority of local citizens were not consulted and the few that did comment on this plan have explained the large negative impact of closing large areas of BLM managed land to recreation, agriculture and resource development? This statement is false and should be changed to reflect the true negative impact to local communities. Very small towns in the planning area are highly dependent upon agriculture, recreation and mineral development, yet their importance is discounted by the above statements.	n	Opinion: Response: No text revision necessary (Thanks for the comment. Resource outputs are the amount of a resource (e.g., AUMs, recreation visits, tons of locatable minerals, etc.) that would be available for use under each alternative. Resource specialists projected annual resource outputs based on the best available information and professional judgment. Based upon public comments, resource specialists have reviewed assumptions used in this analysis to see if they need to be changed or updated. These revised assumptions have been incorporated into the analysis contained in the DEIS. The purpose of the economic analysis is to compare the relative impacts of the alternatives and should not be viewed as absolute economic values. Previous modeling experience has shown that the data contained in the IMPLAN modeling system for the various sectors are accurate representations of impacts.)
DR-	Coal	In addition page 2-20, table 2-1 specifically states "coal acres closed in each	n	Thank you for your comment. A map showing the areas for open and closed

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
MTDK-BL-13-0300-2		plan", with alternate A = 26,131; B = 290,048; C = 264,450; and D = 280,971 and on page 2-27-A it states "No coal leasing on 26,131 acres". For the 26,131 acres there is no map reference so the reading public can identify what is actually being proposed. Why are these acres not clearly identified? Please identify these acreages with maps of such scale as to be readable.		will be included
DR-MTDK-BL-13-0300-3	Social /econ	The major problem with your use of the IMPLAN system is it uses data and information from major urban areas and no information from small communities are gathered or included. Please take a hard look at these statements and consider the fact that you are imposing environmental injustice to these very small communities by closing thousands of acres to recreation and development. An example is failure to address the very real possibility of an active coal mine which has a certified 43-101 "Standards of Disclosure for Mineral Projects" in process incorporating over 12,000 acres of private land in the Bear and Grove Creek drainages. These acres and adjacent acres (including BLM) contain over 1.2 billion tons of "high volatile bituminous" mineable coal in six or more beds. This tonnage is documented by numerous scientific geological studies by Woodruff(1907), Rawlins(1974), Skelly & Loy(2004), Roberts & Rossi (1996) and Grubber (2006 & 2010). Whether we like it or not coal is the primary energy choice for the nation in decades to come until an affordable alternative becomes available.	n	Thank you for your comment. The IMPLAN data are comprehensive - it includes data from both metropolitan and non-metropolitan areas. It is neither feasible nor desirable to conduct economic impact analyses on very small scales (e.g., zip code level) due to the economic linkages between communities. A small-scale IMPLAN analysis would fail to capture the labor and trade flows between communities and the economic consequences would be underestimated. As a result, consequences particular to small communities are addressed in the social analysis. The social analysis addresses environmental justice considerations on pg. 4-590, which describe the potential for disproportionately adverse effects on low income individuals and communities.
DR-MTDK-BL-13-0302-1	Social/econ	The DRMP/EIS refers to a study done by Rasker, Alexander, Van den Noort, and Carter 2004 which attempts to display the benefits and need for open space. The study is not definitive and was done in response to increased subdivision activity in high density areas of western Montana. Carbon County is several hundred miles removed from western Montana and has never been a high density population area therefore applying this study is flawed.	n	Opinion: Response: No text revision necessary (Thanks for the comment. Resource outputs are the amount of a resource (e.g., AUMs, recreation visits, tons of locatable minerals, etc.) that would be available for use under each alternative. Resource specialists projected annual resource outputs based on the best available information and professional judgment. Based upon public comments, resource specialists have reviewed assumptions used in this analysis to see if they need to be changed or updated. These revised assumptions have been incorporated into the analysis contained in the DEIS. The purpose of the economic analysis is to compare the relative impacts of the alternatives and should not be viewed as absolute economic values. Previous modeling experience has shown that the data contained in the IMPLAN modeling system for the various sectors are accurate representations of impacts.)
DR-MTDK-BL-13-0303-1	NEPA	Many members of the public including myself have in the past hunted, and recreated in this area. The DRMP/EIS is not sufficient in conveying to the public a clear picture of what roads and trails are proposed to be closed or remain open. The maps associated with the DRMP/EIS in many cases are of such scale as to be worthless to a user in that they do not indicate road and trail numbers which are necessary for the public to provide substantive comments on specific roads and trails. An example Gold Creek is mentioned several times relating to ACEC's yet I cannot locate it on even one map. When BLM representatives were	N	Thank you for your comment. Gold Creek can be found on any topographic map. It begins in T. 9 S., R. 20 E., section 9 (USFS CNF), runs through sections 10, 11, 2, & 1 of T. 9 S. R. 20 E., section 6 of T. 9 S., R. 21 E., and sections 31, 32, and 33 of T. 8 S., R. 21 E. With regards to road identification, only BLM managed roads were identified on the maps at the open house events.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		asked about the lack of road and trail identification at the open house events we were told these maps were "a work in progress" and that maps of adequate scale included in the report "would cost too much as over \$200,000 had already been spent on printing", quote from Jim Sparks, Area Manager at a public meeting! Why was the document released for public review when it was not finished?		
DR-MTDK-BL-13-0303-2	NEPA	A record of decision to implement the DRMP/EIS before the access information is provided and failure to address private property rights is contrary to the requirements of NEPA and would be a violation of NEPA.	N	Thank you for your comment.
DR-MTDK-BL-13-0304-1	Travel mngt, recreation	In the planning area of the DRMP/EIS I would submit that all of the uses described require some type of motorized access of roads to achieve enjoyment of these activities. You have not clearly identified the way people have historically accessed these lands for the activities listed. I request you address this discrepancy in your analysis to reflect how people really access these areas.	n	BLM's approach to Travel and Transportation management is set by BLM Manual 1626 and Technical Reference 9113-1, which has as their objectives the establishment of a sustainable multi-modal (including motorized, non-motorized, mechanical, and even animal powered modes of travel) transportation system of roads, primitive roads, and trails that address public and administrative access, support the agency's mission and provide resource protection, as well as to manage these resources and uses in accordance with law, Executive Order, proclamation and policy. The decisions in the RMP reflect these considerations, not a biased approach. Information regarding both the historical and actual uses of specific routes can be found in the Route Inventory Files, and throughout the RMP. Please also note that the RMP states that the goal for the Grove Creek TMA is to minimize impacts to geologic, visual attributes, sensitive plants, cultural, and wildlife values while providing access for the public, permittees, non-federal landowners, and administrative needs.
DR-MTDK-BL-13-0304-2	Wildlife	Your analysis and conclusions are flawed in proposing that human presence and surface occupancy is the primary cause of possible Sage Grouse extinction. Clearly history shows that both food source and predator populations cycle historically. Low food source results in a die off of predators from starvation and the predator die off results in a slow increase of food source animal populations. The increase of food source animals results in a slow increase of predator population until the predators overwhelm the food source and reach unsustainable levels and begin to die off, this cycle will continue through all of time. The DRMP/EIS fails to evaluate if man or nature is the problem. I request the BLM include an analysis and science based information regarding trends in food source animal populations in comparison to predator populations	n	Thank you for your comment. Predator control was not included as a threat in the FWS's listing decision; however, the BLM and the Forest Service acknowledge that localized predation may be a factor in the conservation of greater sage-grouse in some areas. In these areas, the states possess primary authority and responsibility for managing the wildlife within the state and the BLM and the Forest Service are responsible for managing habitat. Montana Fish, Wildlife and Parks manage wildlife within Montana, while the BLM and Forest Service focus on managing habitat. Consistent with a Memorandum of Understanding between the BLM and the US Department of Agriculture, Animal and Plant Health Inspection Service-Wildlife Services, the BLM and Forest Service will continue to work with Montana Fish, Wildlife and Parks to meet state wildlife population objectives. Predator control is allowed on BLM- and Forest Service-administered lands and is regulated by the MT FWP and Animal Plant and Health Inspection Service (APHIS). APHIS conducts environmental analyses in accordance with the National Environmental Policy

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
				Act (NEPA). The BLM and Forest Service will continue to work with agencies to address current predation of greater sage-grouse, and BLM and Forest Service-administered lands in the planning area will remain open to predator control under state laws. Additionally, the BLM and the Forest Service will continue to work with the involved states to meet state wildlife population objectives. While adding management actions specifically to manage predators is outside the scope of the amendment, the BLM and the Forest Service have authority to manage the habitat and have provided numerous management actions across the range of alternatives. Altering the sagebrush habitat of the greater sage-grouse can create an influx of predators into an area and lead to a population decline. Roads, fences, power lines, trails and other disturbances may make access easier for potential predators and increase risks to the species. The Draft EIS calls for measures that will substantially reduce disturbances in the bird's habitat, thus reducing predation risk. The Draft EIS also calls for careful monitoring of grazing allotments within sage-grouse nesting habitat to ensure suitable grass and forb cover is reserved so we can minimize the associated predation risks. Predation is cited as a threat to sage grouse on pages AB-2, and AB-22 in the Appendices.
DR-MTDK-BL-13-0305-1	Wildlife	On page 4-398 the DRNP/EIS states:" Because the long-term decline in wildlife habitat would continue under this alternative". BLM has offered scant evidence based on scientific research to support their proposed action. However, the no action alternative A, must be attacked by BLM and painted as not acceptable in order for the BLM to justify changing management direction. Please take a hard look at this statement and provide me with the information and science used in your determination that this statement is true.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS
DR-MTDK-BL-13-0306-1	Social/econ	Agriculture is the number one industry in Montana. Sage Grouse population numbers have flourished because of the benefit of agriculture to their habitat. Man's contribution to these improvements include grains and seeds from farm/ranch activities resulting in stubble fields from grain and hay production, water facilities and haystacks for feeding and cover. These benefits must be recognized and the Sage Grouse strategy must include a cost benefit analysis of the restrictions or potential removal of thousands of acres from the agricultural landscape.	n	Opinion: Response: No text revision necessary (Thanks for the comment.
DR-MTDK-BL-13-0306-2	Social/econ	Any acres closed to recreation and energy development must consider economic benefits (jobs) lost from energy production to communities, counties and the state as required by both MEPA and NEPA. Social and economic analysis is critical. A strong local social and economic environment is critical in preserving wildlife habitat and wildlife populations.	N	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the B&PPNM RMP/EIS.
DR-	Wildlife	Other examples that should be part of the evaluation include the naturally	n	Thank you for expressing your concerns. While statements of opinion

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
MTDK-BL-13-0306-3		occurring mortality rate of sage grouse compared to the mortality rate associated with recreation and mineral development. The evaluation and disclosure to the public must include the analysis and a comparison of the magnitude of impacts to naturally occurring impacts for all resource areas used to assess impacts based on site-specific data. Lack of comparison of impacts to naturally occurring levels combined with the lack of site-specific data could allow inaccurate statements and opinions due to the lack of an adequate sense of magnitude by being arbitrary and capricious.		(including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS.
DR-MTDK-BL-13-0307-2	NEPA	The legislature passed and the governor signed HB 169. This will become law on October 1, 2013. HB 169 codifies in state law, Title 76, the use of a Growth Policy as the legal document a local county may use to coordinate with federal agencies on land planning action that affect their county. Many of the Montana counties affected by the BLM DRMPs have growth policies in place including most of the counties affected by the three BLM RMPs. In the list of participants in this proposal there are many cooperating and collaborating agencies but not one coordinating agency. Coordination is required by federal agencies if local governments wish to engage and have a resource plan in place. HB 169 makes the Growth Policy the legal document the county can use to coordinate. The BLM must contact all counties affected by these DRMPs and ask if they wish to coordinate. Failure to make this effort on the part of the BLM would be in violation of several federal laws and acts.	N	Thank you for your comment. Please see Section 1.5.1 of this document. It contains a list of the county plans reviewed as part of a consistency review. The Billings and Pompeys Pillar National Monument RMP/EIS has 15 cooperating agencies involved in the B&PPNM RMP/EIS. Invitations were sent to 43 federal, tribal, state, and county agencies inviting them to participate as a cooperating agency.
DR-MTDK-BL-13-0307-3	NEPA, wildlife	The Governor of Montana has set up a task force to study the Sage Grouse issue and formulate a plan to enhance their habitat and range. This task force seems worthless and a waste of time if the BLM develops and implements several RMP plans without first considering the outcome of the task force. People on this task force are more familiar with the landscape, the resources, the surface and mineral owners, the issues related to habitat and animal populations, local economies and economic drivers. BLM has woefully failed to address any cause for the decline in Sage Grouse numbers except man.	N	Thank you for your comment.
DR-MTDK-BL-13-0307-4	NEPA	The 63rd Legislature passed SJ15 which is a study bill. This study will analyze the current management practices on federally managed public land in Montana and the possibility of changes to these management practices. The study will look at the relationship between federal land management agencies and the state of Montana. I believe it is premature for the BLM to complete the three BLM RMPs before the Montana Environment Quality Council (EQC) has a chance to complete their work in regards to SJ15. I request the BLM delay their decision a minimum of six (6) months or until such time as the EQC provides recommendations to the BLM on the proposed plan and subsequent implementation of this plan. The first meeting of the EQC is scheduled for June 19-20, 2013.	N	Thank you for your comment.
DR-	Lands w/	Bear Creek does exhibit wilderness characteristics by the BLM standards. Given	n	Thank you for expressing your concerns. While statements of opinion (including

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
MTDK-BL-13-0313-1	wilderness characteristics	<p>that there is an active Bentonite mine in the southwest portion of the unit, we propose to modify the boundaries to focus on the central and southeast portions of Bear Creek. The proposed lines are marked by a dashed line on the map. The line beginning at point 26 follows an established fenceline which would change the size to approximately 5,400 acres and the line stemming from the state land is a possible minimum suggestion for avoiding any disturbances by the Bentonite mine which would change the size of the unit to approximately 6100 acres.</p> <p>There are a number of user created ways in the unit, but most appear to be for ranching purposes. I spent 4 hours in the unit yesterday, June 27, 2013 and encountered no other humans in the unit and the only contact I had on these routes were ranchers going out to work on a fence or fill a stock tank, both of which are not pervasive or omnipresent nor do they substantially detract from the wilderness characteristics. This exhibits the nature of the routes, which show no evidence of blading, as well as the opportunity for solitude based on the low levels of human contact and primitive recreation. There are in fact low levels of vegetative screening in the western portion of the unit with several enjoyable lookout points, but the central and southeast portions of the unit provide a rolling topography which would allow for visitors to find solitude. Because Petroglyph Canyon exists within the unit, there is adequate opportunities for primitive recreation with supplemental cultural value. Based on this information, it is my recommendation that Bear Creek be managed as a Lands with Wilderness Characteristics</p>		<p>agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS.</p> <p>The BLM Field Office staff has reviewed the field work and documentation which was done previously for this unit, both by BLM and the documentation submitted by your organization in your review and comments. In light of this new data and the review, the team has determined that there are further impacts (an old vegetation treatment – with plowing and non-native seeding, active bentonite mining claims being developed along the southern border) and these reduce the wilderness values in some areas in the unit, particularly along the southern border and in the western region, but using your proposed point-point boundary (which is the further west of the two alternative boundaries) the area which does have wilderness qualities is approximately 5,658 acres, which exceeds the required minimum size of 5,000 acres for lands with wilderness characteristics inventory consideration. This core area is in a substantive natural condition (although there are some existing but little-used vehicle tracks), has an outstanding level of opportunity for solitude and primitive recreation (at least in parts of the unit) and has supplemental features present (cultural). This area within the initial inventory unit will be addressed in the RMP as an for lands with wilderness characteristics unit.</p>
DR-MTDK-BL-13-0320-2	Wildlife	<p>Two recent studies have used radio-telemetry to assess impacts of energy infrastructure on sage-grouse. LeBeau (2012) investigated the impacts of wind facilities and an associated transmission line in Wyoming, and Nonne et al. (2013) released a final report of a 10-year study of a transmission line in Nevada. The Nonne study is currently the only long-term study conducted that specifically evaluates potential impacts of a power line on sage-grouse. The LeBeau study indicated that habitat quality is a significant influencer of sage-grouse occupancy, regardless of the presence of a transmission line. Sage-grouse selected for nesting habitat closer to transmission lines at Simpson Ridge, where the lines have existed for over 10 years and are within quality habitat. Also, female survival in the study area was greatest at closer proximity to the transmission lines. In February 2013, the final progress report of a 10-year research study of sage-grouse near the Falcon- Gondor transmission line in central Nevada was released. This report noted correlations between annual plant production, related to annual climatic fluctuations, and sage-grouse survival, reproductive success, and population growth. Wildfire impacts on habitat also influenced the population. The report found "no negative effects on demographic rates (i.e., male survival and movement, female survival, pre fledging chick survival, and nest survival) that could be explained by an</p>	n	<p>BLM intends to rely on the latest research and best available science by utilizing existing research and incorporating other future research through the "Adaptive Management" approach described in Section 2.3.4,</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		individual's proximity to the transmission line". APLIC requests that the BLM consider these studies, which use current telemetry techniques and specifically investigate sage-grouse responses to power lines, when addressing power lines in its RMP updates.		
DR-MTDK-BL-13-0320-3	Wildlife	APLIC submits that stipulations for sage-grouse included in the BLM RMP revision should not include any mitigation requirement unless it is based on valid science, not anecdotal or casual observation, and is specific to sage-grouse (not surrogate species such as prairie chickens). APLIC encourages the BLM to apply the APLIC/agency sage-grouse BMPs, much like the BLM has for APPs, to serve as the current best practices for sage-grouse issues related to electric utility facilities.	n	Thank you for your comment. A BMP Appendix is being revised for the Final RMP/ EIS. Otherwise, the subject of this comment is beyond the scope of the Billings and Pompeys Pillar National Monument RMP/EIS and does not require further agency response.
DR-MTDK-BL-13-0320-4	Wildlife	Installing new power lines underground or converting existing lines from overhead to underground are often raised as possible permit stipulations or mitigation options. However, underground power lines result in significant cost increases, reduced reliability, greater ground disturbance during construction and repairs, longer outage periods for customers, and may not always be feasible from an engineering and operations perspective. Underground power lines can result in impacts to other federally listed species, pose a threat of negative impacts on cultural resources, and may have a negative impact to waterways. Underground power lines require a continuous excavation, including blasting in rocky terrain, through all habitat types. In sagebrush habitat, this would result in ground disturbance for the entire line route and associated access roads. This is in contrast to overhead lines, which result in a disturbance only at the structure locations, and the power line's associated access. Underground lines would also require excavation for repairs or maintenance, which would result in ground disturbance occurring temporally over the life of the line, not just during initial construction. Ground disturbance during construction, repairs, and maintenance can result in large, permanent displacement of excavated soil and subsequent issues with re-establishing native vegetation and preventing the overgrowth of invasive species. A University of California study (Bumby et al. 2009) found that underground power lines have more environmental impacts than overhead power lines for all categories and most scenarios in southern California. For more detailed discussion of environmental and engineering constraints associated with underground power lines, see Reducing Avian Collisions with Power Lines: The State of the Art in 2012 (APLIC 2012), pages 62-63.	n	Note that in Appendix AA (section F) that burial of power lines is the final option. See the statements, "Emphasize the following if perch prevention modifications do not work to protect sage-grouse and sage-brush habitat: 1.) reroute the line using distance, topography, or vegetative cover; or 2.) bury the line." This type of issue raised in your comment will be considered by the Billings Field Office during implementation of the Approved RMP when project-specific plans are prepared or evaluated through NEPA analysis. In addition, "Reducing Avian Collisions with Power Lines: The State of the Art in 2012" will be added as a Reference on page 6-35; Section 2-6.1, page 2-69; Section 2-6.2, page 2-112; B.4, page 6; Section B.11, BMPs, page B-25, and Appendix AA (section F), Mitigation Measures and Conservation Actions for Greater Sage-Grouse Habitat". Reference to APLIC Guidelines, 2006, will also be added to AB-6 and remove the statement, "Avian Power Line Action Committee, 1994.
DR-MTDK-BL-13-0320-5	Wildlife	Perch discouragers were originally designed to reduce raptor electrocutions by moving birds from an unsafe (electrocution risk) perching location to a safer alternative, either on the same structure or a nearby structure on the same line. Recent data has documented poor effectiveness in perch discouragers and greater effectiveness of covers for preventing electrocutions (see A Suggested	n	Thank you for the comment. References to "Fit transmission towers with anti-perch devices" (Lammers and Collopy 2007). Page AB-13, "Installation of raptor anti-perch devices in greater sage-grouse habitat", B-34, and several locations in Chapter 2, Alternatives, will be revised.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		<p>Practices for Avian Protection on Power Lines: The State of the Art in 2006 [APLIC 2006], pages 17-18). Despite their declining use by electric utilities, perch discouragers have been required by resource agencies and installed to dissuade raptors and corvids from perching or nesting on power poles in areas with sage-grouse or other special status species. Perch discourager research has shown limited effectiveness in preventing perching. Discouragers actually increase the potential for nesting on structures because they provide a firm foundation for nest material. Furthermore, use of discouragers to avoid perching on a structure increases electrocution risk by forcing raptors to perch in unsafe areas. In areas where raven predation on sage-grouse nests is a concern, perch discouragers may aid in the accumulation of nest material (APLIC 2006), and could potentially increase raven predation pressure due to nest construction on discouragers in sensitive areas. The negative impacts of perch discouragers must be weighed against the limited benefits, if any, they may provide, particularly if they are contributing to mortalities of protected birds and facilitating increases in predator nesting opportunities. Hunting techniques and strategies of avian predators of sage-grouse should also be considered, because they differ for different prey species. For example, golden eagle diet is largely mammalian (80-90%, Kochert et al. 2002). Golden eagles prey on sage-grouse opportunistically, and typically hunt sage-grouse by stooping from a high soar (Watson 1997, Kochert et al. 2002). Consequently, power poles may not play an important role in eagle predation of sage-grouse. Golden eagles are vulnerable to electrocution mortality (APLIC 2006) and perch discouragers have been correlated with increased eagle electrocution risk (PacifiCorp, in prep.). Common ravens are known predators of sage-grouse nests, yet ravens are able to overcome perch discouragers, will perch on wires, and may experience higher nesting rates on poles with perch discouragers.</p>		
DR-MTDK-BL-13-0320-6	Wildlife	<p>APLIC recommends the BLM adopt the same conservation measures that the Montana Greater Sage-grouse Advisory Council is developing in order to maintain as much consistency with requirements for electric and gas distribution and transmission line as possible. The Montana conservation measures are expected to be developed for adequate protection of the species and to avert a final listing decision from USFWS. Applying the same conservation measures will avoid much confusion and will be much more efficient for industry to manage and implement.</p>	n	<p>Thank you for the comment. APLIC guidelines are recommended for management on 2-69, 112. Adaptive management is described in Section 2.3.4.</p>
DR-MTDK-BL-13-0320-7	Wildlife	<p>Many electric utility companies have Avian Protection Plans (APPs), which are voluntary company-specific documents that guide their activities related to bird issues, particularly electrocution and collision impacts. In fact, APLIC hosted a course in 2012 in Montana geared at educating utilities about the development and implementation of APPs. An APP would typically include avian-safe design standards and areas where they would be applied based on bird use and</p>	n	<p>Thank you for your comment. Your recommendations will be taken under advisement.</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		habitat. These standards would include collision-reduction methods, such as line marking. Because each utility's APP will differ based on local engineering, biological, and environmental variations, APLIC recommends that the BLM reference the use of a utility's APP in regards to collision and electrocution minimization, rather than including blanket stipulations in the RMP.Â		
DR-MTDK-BL-13-0320-8	Wildlife	In the alternatives of the Billings Draft RMP, the use of "bird flight diverters" is noted "to prevent bird strikes and perching by birds of prey". These statements do not correctly reflect the intended use of bird flight diverters. Bird flight diverters are not used to prevent perching -" rather, they are installed on conductors to make lines more visible to birds in flight. In addition, "bird flight diverters" are a specific product type (one of numerous line markers), and the RMP should not specifically identify product types or manufacturers.	n	Thank you for the comment. The reference to "bird flight diverters" will be removed and replaced with the language such as "perch, collision, and electrocution prevention measures" -
DR-MTDK-BL-13-0329-1	Travel mngt	I would ask that the Demijohn Flat route not be open to motorized use, This 1 ½ mile route from Crooked Creek Road threatens a culturally sensitive area which is designated as both a National Register District, and an Area of Critical Environmental Concern (ACEC). Motorized use of this route fractures the Burnt Timber Canyon LWC* from the Burnt Timber Canyon WSA** and thus weakens both. The route is also a good non-motorized route with a trailhead accessible to people without 4WD vehicles.	n	In regards to the Demijohn Flat route, the RMP has a range of possible decisions. In this case, due to the conditions you mentioned the Alternative D has been modified to reflect the current conditions. The route will be designated as "closed" for motorized use with the exception of administrative access. Refer to map 146
DR-MTDK-BL-13-0329-2	Travel mngt	I would ask that Bear Canyon be non-motorized. BLM is proposing motorized traffic for Graham Trail up the southwest slope of Big Pryor Mountain. That makes three redundant parallel motor vehicle routes within less than three miles. (The other two are Bear Canyon and Stockman Trail.) One of the three routes should be designated for non-motorized use. Of the three routes Bear Canyon, through an Audubon Important Bird Area, would be the best non-motorized route. (There would still be abundant motorized access to Big Pryor Mountain with four more motor routes up the west slope, and two more nearby on the south slope.)	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS In regards to the Bear Canyon route, the RMP has a range of possible decisions. In this case, due to the conditions you mentioned the Alternative D has been modified to reflect the current conditions. The route will be designated as "closed" Refer to map 146
DR-MTDK-BL-13-0333-1	lands with wilderness characteristics	Please use your power to protect Yellowstone River Islands, Clark's Fork River Islands, Weatherman Draw and Bad Canyon like other lands identified as having wilderness qualities.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS Please see the end of Table 2.6.1 for Lands with Wilderness Characteristics management prescriptions and then refer to other sections in the table for the specific areas and their management prescriptions – many have the same regardless of designation
DR-MTDK-BL-	Travel mngt	2. I ask that the Big Sky trail and Bear Canyon Creek Trail be designated only for nonmotorized use.. Walkers on these increasingly popular trails should not need	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
13-0338-1		to hike to the end of 4WD/ATV routes to get to quiet trails. (Many people do not have 4WDs or prefer to walk.) 3. I ask that the Demijohn Flat route not be open to motorized use. 4. I ask that Bear Canyon be designated for only non-motorized use beyond the mouth of the canyon.		<p>under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS</p> <p>In regards to the Bear Canyon route, the RMP has a range of possible decisions. In this case, due to the conditions you mentioned the Alternative D has been modified to reflect the current conditions. The route will be designated as "closed" Refer to map 146</p>
DR-MTDK-BL-13-0343-1	Travel mngt, ACEC, fire mngt	<p>I am writing in regards to the ACEC area. My Husband and I are PRIVATE land owners in the Belfry Area on the Grove Creek RD. We are concerned with the recent proposal of the changes of the land use that can affect our property. My understanding is that this alternative D would involve shutting off the connection from Grove Creek over to Meeteetse Trail to get to the Spires. Since we are private land owners we are very concerned with the problems this can cause. We feel it should not be designated an ACEC AREA, because there is too much private land mixed in and management of the whole ACEC would adversely affect us an others as private property owners. We feel you need to take into consideration the fire management you are proposing for this area. Letting it naturally burn and not allowing mechanized on ground fighting of the fire. With the wind that this area gets it would be dangerous to our families and our homes, and property.</p>	N	<p>Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the B&PPNM RMP/EIS.</p> <p>See travel management map 150 for route designations. The BLM can only make route designations on BLM managed public lands. Routes across private land are not shown on the maps.</p> <p>Please see Appendix E for the resource evaluation on this ACEC. Also please refer to FLPMA Sections 103, 201, and 202 for the direction which it provides regarding the high priority BLM is to give in the designation and management of ACECs. Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS.</p> <p>In response to your comment regarding access, please refer to the Travel Section, Appendix O and related Maps. Alternative D has provided for motorized access through a number of designated routes. There are also a number of county-maintained roads in the area, over which BLM has no authority.</p> <p>In response to your comment, the text in Alternative D for the Grove Creek ACEC of the Proposed RMP and Final EIS has been revised to state: Wildfire management (natural ignitions) for resource benefit. Full range of fire management activities would be used in ACEC in response to human-ignited fires. Use of heavy equipment and retardant would be avoided unless approved</p>

*Billings and Pompeys Pillar National Monument
Proposed Resource Management Plan and Final Environmental Impact Statement*

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
				by authorized officer.
DR-MTDK-BL-13-0344-1	Travel mngt	Specifically, I would like to see both the Bear Canyon Trail as well as the Big Sky Trail, be designated for non-motorized use. In addition, I urge you not to open up the Demijohn Flat route to motorized use. To do so, would seriously impair the beauty, solitude and quiet of this area.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS In regards to the Bear Canyon route, the RMP has a range of possible decisions. In this case, due to the conditions you mentioned the Alternative D has been modified to reflect the current conditions. The route will be designated as "closed" Refer to map 146
DR-MTDK-BL-13-0348-1	Livestock Grazing	As quoted in the Draft RMP: Preferred Alternative: "Action 3 -" The allotments in Table 1 (see the Livestock Grazing Appendix), in which the Standards for Rangeland Health were not met (including Sage-grouse Habitat), livestock grazing was a causal factor in the failure to meet these standards, and there was no progress towards meeting Standards for Rangeland Health in the allotments within 5 years of the initial determination would be eliminated and closed to livestock grazing." Please show solicitors opinion, regulation, or statute that allows you this authority.	n	These actions are not proposed or listed in any livestock grazing alternative within the Billings DRMP
DR-MTDK-BL-13-0348-2	Livestock Grazing	The economic impacts on a community will be far reaching into the future livelihoods for agriculture if a continuation of decreased allotments were to continually take place on BLM lands. You are messing with our historic way of life. Your EIS does not even touch on the possible negative economic consequences that future BLM management will be responsible for under this alternative. I am assuming that you should have addressed this in the "environmental consequences" of you Draft Resource Management Plan.	n	The RMP/EIS assesses the economic contributions of BLM's grazing program on the Billings and Pompeys Pillar National Monument planning area and Chapter 4 analyzes potential impacts of alternative management actions which may affect future livestock grazing. This analysis has been updated in the Proposed RMP/Final EIS with better use data to more accurately quantify potential impacts to the local economy.
DR-MTDK-BL-13-0348-3	NEPA	The Montana Constitution says: "Right of participation. The public has the right to expect governmental agencies to afford such reasonable opportunity for citizen participation in the operation of the agencies prior to the final decision as may be provided by law." State constitutions must follow federal law! So, you must follow our constitution. Your comment period is way too short by anyones standards to be defined as "reasonable opportunity" and should be extended at least another 90 days or more.	N	Thank your for your comment. NEPA requires a 60 day comment period for EISs. The BLM normally extends this 60 comment period for an additional 30 days for RMP/EISs.
DR-MTDK-BL-13-0351-1	lands with wilderness characteristics	The BLM failed to properly analyze the alternative identifying all available land as includable in the designation of lands with wilderness characteristics. The preferred alternative leaves out Weatherman Draw, Bad Canyon and Yellowstone River Islands and Clark's Fork River Islands. These landscapes should be managed for their wilderness qualities.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS Please see the end of Table 2.6.1 for Lands with Wilderness Characteristics

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
				management prescriptions and then refer to other sections in the table for the specific areas and their management prescriptions – many have the same regardless of designation
DR-MTDK-BL-13-0351-3	Travel mngt	Special landscapes should be managed with at least the following management proscriptions: Close the areas to oil and gas leasing or allow leasing with no surface occupancy Identify areas where utility rights of way are excluded Designate areas which are closed to development of wind farms Close wildlands from new road construction and off-road vehicle traffic Close wildlands from mineral exploration and entry	n	Thank you for your concerns and comments. BLM follows Manual 6301 in conducting its wilderness inventories and Manual 6302 when considering lands with wilderness characteristics during planning. These Manuals implement Secretarial Order 3310 and incorporates principles from BLM guidance (Organic Act directives) and legal rules developed as part of BLM's original wilderness inventories. Please compare the lands with wilderness characteristics Unit maps (maps 42 to 45) with BLM Manual 6302 and maps for Oil and Gas leasing, ROWs, etc (50 to 78 and 152 to 156) most areas which have been found to possess wilderness characteristics have a measure of restrictions or are not allowed. Please see the end of Table 2.6.1 for Lands with Wilderness Characteristics, management prescriptions, and then refer to other sections in the table for the specific areas/units not found to possess wilderness characteristics and their management prescriptions – many have the same regardless of designation
DR-MTDK-BL-13-0351-4	Travel mngt	Off highway vehicle use should be restricted and ORV use should be limited to existing roads where the use is compatible with other landscape amenities. As part of its travel management, the draft RMP should: Close the Demijohn Flat route to motorized use because of ORV effects on cultural sites and the adjacent Burnt Timber Canyon WSA Close to motorized use the two-track leading into Bear Canyon past the mouth of the canyon. There is already sufficient access into this part of the Pryors. Include an analysis in the RMP of designating routes as "non-motorized"	y	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS In regards to the Bear Canyon route, the RMP has a range of possible decisions. In this case, due to the conditions you mentioned the Alternative D has been modified to reflect the current conditions. The route will be designated as "closed" In regards to the Demijohn Flat route due to the conditions you mentioned the Alternative D has been modified to reflect the current conditions. The route will be designated as "closed" for motorized use with the exception of administrative access. Refer to map 146 In regards to the designation of non-motorized trails in the RMP, the new BLM Manual 1626 Travel and Trail Management prescriptions have been incorporated into the document and there is a section on non-motorized trails
DR-MTDK-BL-13-0351-5	wildlife	Management of the sage grouse priority protection areas should include restrictions on oil and gas leasing. Leasing should only be permitted with no surface occupancy and no construction of new permanent roads.	n	Thank you for your comment. Please see Appendix C - Oil and Gas Lease stip.
DR-MTDK-BL-	NEPA	You currently have three "suppositions" (Jerri Tillet, Nikki and Douglass Spotted Eagle) in Federal Court (Ninth Circuit Court of Appeals: #13-35139) arguing	N	Thank you for your comment.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
13-0352-1		malfeasance on your part.		
DR-MTDK-BL-13-0352-2	WSR	CROOKED CREEK: I have been actively requesting the BLM to designate the whole of the Creek -WILD (down to my fence line); in order to protect the creek.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses of text revisions under NEPA regulations, they have been considered in the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS. Crooked Creek is a high priority for resource conservation on all of BLM ownership. Various special designations and the presence of the pure Yellowstone Cutthroat trout population ensures the stream and its corridor are conserved.
DR-MTDK-BL-13-0352-3	Cultural, WILD HORSES	Douglass Spotted Eagle: Full blooded Cheyenne (and speaks fluent Cheyenne), (former) bundlekeeper (i.e.: Shaman/ Medicine Man) - which is akin to the Pope (in our culture); warrior (decorated for his service in Vietnam), etc. He has specifically told you that the PMWHR wild horses are a Cultural Heritage (for them as well as "us" - BLM recognized the wild horses as such, as recently as the early 1990's). Please review IBLA #: 2012-163 (as well as #13-35139). And yet the BLM/ IBLA! 001 has stated (in IBLA'S Judgment): "Appellants advance the argument that the horses on the PMWHR are a Native American cultural resource and that BLM erred in not considering them as such. ... However, appellants do not point to any statutory provision that would justify categorizing the horses as cultural resources."	N	Thank you for your comment.
DR-MTDK-BL-13-0352-4	WILD HORSES, PMWHR	bring up the AML to the appropriate viable number which is 180+ and allow the wild horses genetic viability over the long-term. [As long as horse numbers are below 200, grazing impacts to the range (PMWHR) are acceptable." --IBLA Judgment 2001. - AND - "That reducing the population below 140-150 over the long term, could have negative effects on its genetic viability." --- BLM (BiFO) a decade or more ago. - AND - An ADULT horse is 4-5 years of age or older (NOT A YEARLING!)]	N	Thank you for your comment however detailed objectives are addressed within implementation level documents such as Herd Management Area Plans
DR-MTDK-BL-13-0352-5	WILD HORSES, PMWHR	BLM is tenacious in adhering to the "safe" negative attract~ field matrix. (Below the vibratory rate of 200. Note: Domestic horses (as a whole) are something like 50 "points higher" than the DOI on the Map of Consciousness Scale. They are located in the positive attractor field/ matrix.	N	Thank you for your comment
DR-MTDK-BL-13-0352-6	WILD HORSES, PMWHR	The following resources or resource uses have been determined to have little or no impacts to the wild horses or the Pryor Mountain Wild Horse Range from BLM authorized uses and management: Climate Change." Climate Change affects the whole world. How did the PMWHR manage to escape?	N	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS.
DR-MTDK-BL-13-0352-7	WILD HORSES, PMWHR	The designation as a wild horse range mandates wild horses as the principal multiple use but not necessarily the exclusive use." So why doesn't the BLM PROTECT the wild horses as a valuable and GENETICALLY VIABLE species!!!	N	Thank you for your comment

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
DR-MTDK-BL-13-0352-8	WILD HORSES, PMWHR	"Impacts to Wild Horses and the Pryor Mountain Wild Horse Range would likely result from actions proposed under the following resources or resource uses: Livestock Grazing." Then you go on to explain that it is ONLY TRAILING ("that individually last less than a day but occur numerous times in the spring and fall. ").	N	Thank you for your comment
DR-MTDK-BL-13-0353-1	WILD HORSES, PMWHR	I ask you please carefully take into account the bloodlines, genetics and colors of the horses that are caught. Continue to preserve. I fully support a 15 mph speed limit mountaintop, prohibiting of people privately feeding the horses.	N	Thank you for your comment
DR-MTDK-BL-13-0353-2	Travel mngt, recreation	Between April 15-June 15, use signs to explain penalties for off road use. Volunteers would be happy to move timber and such to block unapproved roads.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS. BLM has an existing sign plan in place and uses different methods of blocking roads as part of its routine operations.
DR-MTDK-BL-13-0355-1	WILD HORSES, PMWHR	Your roundups of wild horses are unnecessary, cost tax payers More money in the long run, as opposed to leaving them be.	N	Thank you for your comment however this document is not tied to any gather as gathers are implementation level documents.
DR-MTDK-BL-13-0355-2	WILD HORSES, PMWHR	the videos I've seen of these roundups is the most cruel and outright sadistic thing I've ever watched. The foals and other horses trample each other in their attempt to escape because they are Terrified. And it doesn't stop there. Afterwards they are electrically shocked, beaten, then kept in holding pens only to await another terrifying event of being beaten again then butchered.	N	Thank you for your comment however this document is not tied to any gather as gathers are implementation level documents.
DR-MTDK-BL-13-0356-2	Wildlife	Also it is very important to do what we all can to keep the Sage Grouse off of the endangered species list because this would create huge if not impossible obstacles moving forward.	n	Thank you for the comment.
DR-MTDK-BL-13-0358-1	WILD HORSES, PMWHR	There is ample proof that these animals are harmed during your round-up. Is that really necessary. Your choppers chase horses off cliffs. Why? What is the point? Can you please explain it to me? I ask that we find an alternate plan to control this "horse population"	N	Thank you for your comment however this document is not tied to any gather as gathers are implementation level documents.
DR-MTDK-BL-13-0359-1	Social/econ	MLC produces annual sales of 650,000 tons of chemical limestone, with annual sales of \$10 million to various customers. WLP annual sales are approximately \$14 million. The combined limestone and lime operations directly impact the region's economic base with \$2.4 million in payroll and benefits for 33 employees.	n	Thank you for your comment. MLC's operations do benefit Carbon County's economy. However the table you reference has to do the amount of BLM federal minerals contributing to Carbon county's economy.
DR-MTDK-BL-13-0359-2	NEPA	We believe that with proper development and management of the Dakota Coal and MLC resources and claims, the RMP/EIS goals and objectives for habitat management can be met while maintaining a valuable regional economic resource that ultimately contributes to cleaner air and water for Montana and the surrounding region.	N	Thank you for your comment.
DR-	edits	1. Executive Summary. Section 1.6.1.12.1. and for all subsequent occurrences	n	Thank you for your comment.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
MTDK-BL-13-0359-3		<p>of these statements and conclusions in the RMP/EIS. We respectfully request that revisions to two paragraphs in this section be incorporated into the final RMP/EIS: Suggested revisions (in italics) for completeness and clarification:</p> <p>"With the exception of bentonite and chemical grade limestone, the development potential for other locatable minerals in the planning area is low. Large areas of commercially viable chemical grade limestone deposits in the planning area are located just northeast of Warren in southern Carbon County, occurring in the exposed upper Madison Umestone strata of the southwest flank of Big Pryor Mountain. Current and future bentonite and chemical grade limestone surface mining operations would not be affected under any of the alternatives because the mining claims are valid, existing rights and the areas recommended for withdrawal do not coincide with areas having development potential. "The BLM anticipates only limited development for locatable minerals (except for moderate development for bentonite and chemical grade limestone), fluid minerals, coal, and mineral materials during the life of the plan and, therefore, effects to the development of these resources from the alternatives are expected to be minimal to moderate. "Rationale: Based on the 50-plus year history of high-calcium limestone production from the Warren (Bighorn) Quarry now operated by Montana Limestone Company (MLC) in Carbon County, we believe this section and the conclusion statement should be amended to point out the significant viable locatable chemical grade limestone deposits in the southwestern Warren Pryor Mountains area. MLC is a division of the Dakota Coal Company (Dakota Coal), which acquired and improved the quarry operation in 2002 to provide chemical grade limestone products required by its customers. The quarry is recognized as one of the region's leading names in the production of chemical grade limestone which is provided at a level of over 95% calcium carbonate.</p>		
DR-MTDK-BL-13-0359-4	Coal	<p>Dakota Coal believes that the RMP/EIS does not adequately address the fact that this valuable locatable mineral - chemical grade limestone - is currently being mined in significant quantities with substantial reserves, contributes millions of dollars to the local economy, has a strong regional market, is supported by existing transportation infrastructure, and can continue to be mined well into the future given the multiple valid claims existing to the north and east-southeast boundaries of the current mining operations.</p>	n	Thank you for your comment.
DR-MTDK-BL-13-0359-5	Wildlife	<p>Section 2.5.2 Alternative B Dakota Coal believes that Alternative B is overly stringent and over-reaching in its approach to regional resource management. The closing of vast areas of the planning area to access, development, and use for private, public and commercial purposes does represent a reasonable balance of conservation objectives and resource yield management objectives for a majority of affected parties. Although the threat of an endangered species listing necessitates increased management of resources and</p>	N	Thank you for the comment. Your comment will be considered when alternatives are selected in the Final RMP/EIS decision. Note that Alternative B is a conservative alternative and is not the Preferred Alternative.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		restoration/mitigation efforts, this all or nothing approach would precipitate undue economic stress and quality of life impacts throughout the planning area. Yet, more measured approaches based on incremental steps, data gathering, monitoring and re-assessment would likely offer substantial, meaningful improvements to general and critical habitat over time without the immediate long-term deleterious economic and human impacts.		
DR-MTDK-BL-13-0359-6	Travel mngt	Trails and Travel Management Areas (Table 2-6.2, Maps 143-146) Dakota Coal finds that the Alternative C TMA unnecessarily closes critical access roads to the Big Pryor Mountain through its southwestern flank from Warren, effectively channeling all OHV to one main open east-west route (Helt Road) rather than three managed routes as allowed under Alternative D. The funneling of all vehicles onto Helt Road would greatly increase the traffic load on this route and would lead to increased conflicts between administrative, recreational, and industrial/commercial vehicles. Ultimately, the OHV load could result in greater off-designated route traffic and associated habitat degradation. In addition, Alternative C keeps Graham Road closed, which would unduly limit access to unpatented mineral claims in BLM and USFS lands open for locatable and mineral materials rights, as well as recreational uses. Alternative D offers greater flexibility in designated routes to adequately service this destination area. Please give priority to opening Graham Road, keeping Helt Road open, and creating adequate access to the west Pryor Mountain area through multiple designated routes. These decisions could help prevent OHV traffic conflicts, reduce overuse of limited designated routes, and help prevent off-route traffic that could deteriorate habitat.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS. In response to your comments, the BLM staff reviewed the decisions in the Pryor Mountains TMA Alternatives. The decision on Graham Trail is to open the road, ensuring access to the mining claims and to be consistent with adjacent FS decisions. Helt Road is open for all travel.
DR-MTDK-BL-13-0359-7	edits	Affected Environment, Section 3.17.4.5 "Locatable Materials We respectfully request that the following revisions be made to this section. Suggested revisions (in italics) for completeness and clarification: "There are currently two approved 3809 mine plans for bentonite. Development potential for additional bentonite, gypsum, uranium, and limestone exist in the decision area. Locatable minerals related mining activity consists of two active bentonite mines and one active chemical grade limestone quarry, located in Carbon County. Two mining companies have both patented and unpatented claims for bentonite located on the west and southwest flanks of the Pryor Mountains in southern Carbon County. One mining company has patented and unpatented claims for chemical grade limestone on the southwest flanks of the Pryor Mountains near Warren in Carbon County. "Please add to end of the section the following specific company information: The Montana Limestone Company (MLC), a subsidiary of Dakota Coal Company (Dakota Coal), operates the Warren (Bighorn) Quarry about four miles northeast of Warren, Montana located in Carbon County, Montana. The Warren Quarry operation produces about 650,000 tons of chemical grade limestone each year, with average sales of about \$10 million. MLC also owns a	n	Thank you for your comment.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		limestone fine grind plant and rail load-out facilities. Bighorn Limestone Company (BHLC) has an operating permit issued in 1972 by the State of Montana's Department of Environmental Quality (DEQ). BHLC controls over 1,500 acres of patented claims in the Warren Quarry area. MLC owns 50% of BHLC and controls the mining rights on the BHLC patented claims as regulated by the DEQ operating permit. Dakota Coal controls 390 acres of unpatented claims on BLM and USFS land. [NOTE: Table 3-50 lists the following claims, which do not appear to include Dakota Coal.]Lode Claims Carbon Placer Claims 82Saleable Minerals 151 Permits 12		
DR-MTDK-BL-13-0359-8	Social/econ	Affected Environment Suggested revisions (in italics) for completeness and clarification: Section 3.32.2.1 Demographic and Economic Characteristics and Trends On Table 3-71, please include chemical limestone production under the "Major Population Center(s) and BLM Land/Mineral Uses" Column for Carbon County.	n	Thank you for your comment. MLC's operations do benefit Carobn County's economy. However the table you reference has to do the amount of BLM federal minerals contributing to Carbon county's economy.
DR-MTDK-BL-13-0359-9	Coal	Section 3.32.2.2.2 Mineral Development and Production "Federal mineral activities include oil and gas leasing and production, mineral materials (sand and gravel and decorative stone), and some unpatented bentonite claims. There may also be a federal coal lease sale in 2011 . Mining of private minerals includes these same minerals as well as coal, sand and gravel, chemical limestone, and platinum group minerals."	N	A federal coal lease sale was conducted in the planning area in 2012.
DR-MTDK-BL-13-0360-1	WILD HORSES, PMWHR	I strongly urge you to save the Pryor Mount Wild Horse Range in particular at this time. I urge you to look again at the practices and procedures currently in use and adjust your thinking to encompass the best possible outcome for the animals and the environment as a whole for all areas under your supervision.	N	Thank you for your comment
DR-MTDK-BL-13-0362-1	lands with wilderness characteristics	We believe that Pryor Mountain Unit, Tract 4 (455 acres) should also be designated as an LWC. It is currently a strange "island" entirely surrounded by two adjacent Wilderness Study Areas (WSAs). The only reason it is not already part of one or the other WSA, and the only reason it is not designated as an LWC in the RMP, is because two redundant motorized routes go on opposite sides of it. The fact that the area between the two routes is only 455 acres is strong evidence of the unnecessary	n	Thank you for your concerns and comments. BLM follows Manual 6301 in conducting its wilderness inventories and Manual 6302 when considering lands with wilderness characteristics during planning. These Manuals implement Secretarial Order 3310 and incorporates principles from BLM guidance (Organic Act directives) and legal rules developed as part of BLM's original wilderness inventories. Tract 4 of the Pryor Mountain Unit does not currently meet the size criteria. Please see Appendix K for details. The lands are not contiguous with either WSA and are isolated by the roads.
DR-MTDK-BL-13-0362-10	Travel mngt	Route PM1006 and part of PM1001. (Mostly in sections 27 & 28 T9S R28E)PM 1006 is a 2 mile route from PM 1001 and back. The two routes are redundant. One route should be closed. We recommend closing PM 1006 and designating it as a non-motorized trail. The 445 acres inside the loop should be designated and managed as an LWC.1. Since the two routes are redundant closing one will not inhibit motor vehicle traffic up and down Sykes Ridge.2. This would reduce the many resource concerns identified on the Route Inventory Sheet.3. The 445-acre island between the routes, excluded from WSA status could become an LWC.4. The Route Inventory Sheet identifies hiking as a "primary" use of route	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS. Regarding the Sykes Ridge routes (PM 1001 and PM 1006) the BLM staff has determined that both route segments will remain as open for motorized use in the RMP.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		<p>PM 1006. Access to this hiking route is not difficult for people without a 4WD. It is about a 1-mile cross country hike from paved Highway 37 in BCNRA to this route. Constructing a connecting trail might be considered in the future.5. The Route Inventory Sheet for PM 1006 claims the route is not "redundant" and that its uses cannot be met by another route. But the use of driving up Sykes Ridge can be met by PM 1001. One identified primary use of hiking can be better met if PM 1006 is designated as a non-motorized route</p>		<p>Regarding the potential construction of a non-motorized trail from Bad Pass Highway (state route 37) much of the lands are not managed by the BLM and the decision is beyond the scope of this plan.</p>
<p>DR-MTDK-BL-13-0362-11</p>	<p>Travel mnngt</p>	<p>Lisbon - Dandy Mine Loop This is an opportunity to designate a non-motorized loop route. (We can't determine all the BLM route inventory numbers from the BLM map. The loop includes routes PM 1023 and PM 1024. The loop is mostly in sections 4 & 9 T9S R27E. (See map.) The route (PM 1023) in section 9 from Crooked Creek Rd up to the Dandy Mine and Red Pryor Mountain Rd is designated open for motor vehicles in Alt D. This route should be designated for non-motorized use only. The rest of the loop including the switchback route, mostly in section 4, from Crooked Creek Rd up to the Lisbon Mine is closed in Alt D. This entire loop should be designated for non-motorized use only. Some Reasons:1. There are an abundance of motorized routes for access to the Pryors, but a scarcity of non-motorized routes.2. There are four other motorized routes up Red Pryor Mountain. Besides Red Pryor Mountain Rd itself, there is the switchback road from Crooked Creek Rd on Custer NF about 1 ½ mile to the north of this loop, and two routes up from Horse Haven Rd to the west. These contribute to the many loop routes available for motorists.3. The trailhead for this hiking loop is accessible without a 4WD vehicle. Yet the hike provides outstanding views of Demijohn Flat, Crooked Creek Canyon and the East Pryor Mountain block</p>	<p>n</p>	<p>Regarding the potential for a non-motorized trail using segments of PM 1023 and PM 1024, the BLM has reviewed the preliminary decisions in the RMP and has left all segments of PM 1024 as closed, with the exception of a segment from Red Pryor Road (PM 1025) to the top of the ridgeline (which could potentially serve as a staging area.). The BLM review determined that PM 1023 would remain as "open" in the RMP. BLM will consider further the establishment of a designated non-motorized trail using components of PM 1024 and other routes in its follow-up Implementation Plan. Also note that non-motorized use is allowable on all open motorized, administrative only motorized routes, and closed vehicle routes</p>
<p>DR-MTDK-BL-13-0362-2</p>	<p>ACEC</p>	<p>The Pryors Coalition endorses the Montana Native Plant Society's (MNPS) recommendation that the Pryor Foothills ACEC be expanded to the west to include sections 30 and 31. We greatly respect MNPS expertise and concern that this expansion is needed to help protect important and rare plant communities</p>	<p>N</p>	<p>Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the B&PPNM RMP/EIS. Please refer to Appendix E. Areas Of Critical Environmental Concern in the Draft RMP/EIS for a discussion of ACEC Nominations for East Pryor ACEC (BLM nomination), Pryor Foothills Research Natural Area/ACEC (public nomination), and Sykes Ridge Rare Plant ACEC (nomination by Peter Lesica).</p> <p>Please see the 1998 ACEC Assessment and Proposed amendment to the Billings, Powder River and South Dakota RMPs here: http://www.blm.gov/style/medialib/blm/mt/blm_programs/planning/billings_rmp/amendments.Par.94086.File.dat/acecEA.pdf</p> <p>pages 74-76 are the nominations evaluations for the Billings RMP and page</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
				103 shows the map of the nominated vs. recommended ACEC.
DR-MTDK-BL-13-0362-3	ACEC, WSA	We do not approve of BLM's recommendation to remove area in the three WSAs from the East Pryor ACEC. WSA designation does not "provide adequate protection" (E-14, 33) for these areas. WSAs and ACECs are established for very different reasons and managed with different objectives. We see no reason to "eliminate the overlapping designations" (E-14). These compatible "overlapping designations" serve an important purpose of identifying and protecting multiple resource values. The Nomination Evaluation for the East Pryor ACEC (E-12 to 14) clearly identifies an amazingly broad range of reasons for this ACEC that are not part of WSA designation and management. Congress could at any time release the WSAs on East Pryor. Then the WSA surrogate for ACEC protection would vanish. We do not think the language that this area "would be managed as an ACEC" (2 169) is adequate. It should BE an ACEC.	N	<p>Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the B&PPNM RMP/EIS</p> <p>ACECs are proposed where special management attention is required to protect the important and relevant values in relationship to management in the BLM preferred alternative in the RMP. Should existing management be present (like a WSA) that protects the relevant and important values then ACEC designation is not necessary. Language is included in the RMP that should congress (ever) make a decision on wilderness in the Pryors, and this area not be designated wilderness, then it would be managed as an ACEC.</p> <p>As WSAs contain the most restrictive management, there is no need for an ACEC to overlap the WSA. The relevant and important values of the East Pryor ACEC are addressed through the management of the WSAs. Thank you for your comments.</p> <p>In regards to the overlapping designations of ACEC/Wild Horse Range/WSAs, the actual management prescriptions (No Oil and Gas development, etc.) are intended to be in place regardless of the land's designation.</p> <p>Please see table 2.63; Page 2-168 for WSA management prescriptions and page 2-147 for management prescriptions in the East Pryor ACEC, as well as page 2-171 for management prescriptions in the PMWHR.</p>
DR-MTDK-BL-13-0362-4	Travel mgmt	Nothing in this RMP addresses the need for designated non-motorized routes in the Pryors	y	In regards to your comment, BLM Manual 1626 (Travel and Transportation) specifies that BLM establish a comprehensive program for both motorized and non-motorized travel. This will be done in this RMP. See Appendix O.
DR-MTDK-BL-13-0362-5	Travel mgmt	A. The north end ½ mile of Bear Canyon "road" (In north ½ of section 3, PM1070) This section in the bottom of the canyon was washed out by a flood in spring 2011. It is currently signed closed to motorized use and barricaded. This is the only designated non-motorized route in any alternative (Alt B, map 144). In Alt D this section is designated open to motorized use (map 146). Several reasons why this route should be designated for non-motorized use only. 1. This route is in a sensitive and rare (in the Pryors) riparian area. Bear Canyon is one of the few canyons on the south side of the Pryors that has intermittent to perennial water available for wildlife. It is also part of a National Audubon Society-designated Important Bird Area. Motorized use would significantly disturb birds and other wildlife using and dependent on the area. 2. This area is	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		infested with invasive weeds. Efforts to manage those weeds are beginning. Motorized use will seriously handicap this effort. Also motor vehicles making a quick 1 mile round trip tour into this canyon before going on up the Bear Canyon Ridge Rd (PM1069) would collect weed seeds to distribute throughout the rest of Big Pryor Mountain.3. This route is part of an increasingly popular hiking route for people who wish to escape motorized commotion. It has been used several times already in 2013 by MWA hiking groups. The presence of new cairns marking the descent into Bear Canyon indicate additional use by other hikers.4. This is a dead end route for motorized use. The old (and illegal) track on north into Custer NF is closed to motorized use		
DR-MTDK-BL-13-0362-6	Travel mngt	we suggest the non-motorized route be Bear Canyon (PM1068) beginning at the canyon mouth ½ mile from Helt Rd for a number of reasons.1. It is an ecologically sensitive area and a National Audubon Society IBA, (See above)2. It is part of an increasingly popular hiking trail.3. Bear Canyon is the roughest of the three routes for motorized access.4. Although the route does connect with a motorized route on Custer NF, that CNF route is easily motor accessible from Stockman Trail.5. Equestrians, including the Beartooth Back Country Horsemen, are very concerned about safety issues related to mixing horses with motorcycles and ATVs. This would provide separate staging areas and trails for motorized use and horses.6. The inventory sheet for this route (PM1068) identifies many "special resource" concerns with regard to this route including birds, plants, soils, and archeological sites. The inventory sheet claims "Mitigation will be achieved by employing adaptive management monitoring of the status and/or integrity of the potentially impacted sensitive resources or resource issues identified above as they relate to various factors (e.g. climate cycles, exotic species introduction, visitor use levels [type, intensity, season of use])." This vacuous bureaucratese does not identify any specific action that can or will be taken to mitigate impacts of motorized use on the identified resources.7. The closure of PM1071 to public motorized use would do a lot to minimize impacts to Bear Canyon's special resources and make it a better place for hikers and equestrians. There would be public access to Bear Canyon rather than a motorized thoroughfare through Bear Canyon to the rest of Big Pryor Mountain. (Stockman Trail and perhaps Graham Trail would serve that purpose.)8. The Route Inventory Sheet for PM 1068 includes the question: "Can the ... uses of this route be adequately met by another route that minimizes impacts to the sensitive resources identified above ...?" BLM answers "No." We think the correct answer is obviously "Yes" because Stockman Trail goes to the same place. The only motorized use of this route that can't be met by Stockman Trail is motorized use of this route. (This would be true of any route.)	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS In regards to the Bear Canyon route, the RMP has a range of possible decisions. In this case, due to the conditions you mentioned the Alternative D has been modified to reflect the current conditions. The route will be designated as "closed" Refer to map 146
DR-MTDK-BL-	Travel mngt	This route should be closed to motorized use and designated as a non-motorized route because:1. It is the beginning of an increasingly popular hiking	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
13-0362-7		<p>route informally called the "Big Sky Trail." The trailhead is near a good gravel road (Helt Rd) and is accessible without 4WD. Although a moderately high clearance vehicle is desirable for the 1.8 mile distance on Horse Haven Rd, someone with only a highway vehicle could park near Helt Rd and still access the trail with a 1 ½ mile extra walk on Horse Haven Rd.2. People do not want to, and should not have to walk a mile on route PM1034 before escaping motorized commotion and impacts.3. There is no particular purpose for this to be a motorized route. It dead ends at the CNF boundary. None of the old tracks north of the fence on Custer NF are legal for either public or administrative motorized use. CNF has a "no motor vehicles" sign at the fence and the gate is locked.4. If motor legal, this route would be an "attractive nuisance" tempting people to illegally drive further on BLM or on north into CNF where extensive illegal driving is possible. Having this route open to motorized use would cause an enforcement problem. How often will the scarce BLM and CNF law enforcement people make the 2 mile round trip in to the fence to check for violations? The fence was cut fall 2012. The cut fence was neither discovered nor repaired by BLM or CNF. Appropriate closure to motorized use at Horse Haven Rd means any vehicle tracks from that point indicate illegal activity, and would thus be a great aid in simple, efficient enforcement of ORV use regulation.5. According to the BLM Inventory Sheet for this route it is a "connector" route and provides property access to the Forest Service. But the 2008 CNF TMP does not designate the tracks north of the fence (on CNF) for either a public or administrative motorized use. So PM1034 does not "connect" to any other motorized route, public or administrative.6. There are a number of "Special Resource" issues identified in the Inventory Sheet related to this route.7. The inventory Sheet answers "No" to the question, "Can ... uses of this route be adequately met by another route that minimizes impacts....?" This question presumes motorized use. Since it is a dead end motorized route the answer should be "There aren't many motorized uses of the route." However the non-motorized use of this route can be better met by closing it to motorized use</p>		<p>under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS</p>
DR-MTDK-BL-13-0362-8	Travel mngt	<p>Redundant Routes connecting Horse Haven, Bear Canyon, Stockman, and Graham Rds parallel to Helt Rd. (PM1076, PM1077, PM1082 ?)This approximately 4 mile route (three segments connected end to end) is proposed to be open for public motorized use in BLM's preferred alternative (D). It is not motor legal in Alt A and is currently signed "closed." It is also closed in Alt B. The entire route should remain closed to motorized use.1. This is a classic example of unneeded parallel routes. For most of its length it is less than ½ mile north of, and in sight of Helt Rd. It follows the base of Big Pryor Mountain at the edge of the flat.2. The eastern 1 ½ (approx.) mile between Bear Canyon and Horse Haven Rd (PM1076), provides a loop hiking route connecting the Bear Canyon and the Rocky Juniper Trails. (This 6 mile loop includes about 1 ½ mile of</p>	n	<p>Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS</p> <p>The routes along the base of the mountains (PM 1082, PM 1077, and PM 1076) which you have expressed concerns with have been reviewed by the BLM staff and the determination is that they will remain as closed. The RMP has been altered to reflect this decision. PM 1076 will be specifically designated as a non-motorized trail component?</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		motor legal route in Bear Canyon and a short section of Horse Haven Rd., but with this newly proposed motorized route the 6 mile hiking loop would include 3.3 miles of motorized route.)3. There is no need for the slight shortcuts these route segments provide for motor vehicles between Horse Haven, Bear Canyon, Stockman, and Graham. Helt Rd provides the needed access.4. The claim in BLM's Route Inventory Sheets that these routes are not redundant because they have public (motorized) uses that can't adequately be met by other routes is simply false. However the non-motorized public use of especially PM1076 cannot be met by another route		
DR-MTDK-BL-13-0362-9	Travel mgnt	Demijohn Flat Route PM 1019 (SE from Crooked Creek Rd just south of BLM/CNF boundary.)This route is designated open in Alt D, but should be closed to public motorized use and designated for public nonmotorized use. (It could still be an administrative route as in Alt B.)1. This route encourages public motorized access to a culturally sensitive area designated as a National Register District and an ACEC. The preferred alternative proposes expanding the ACEC to include all of the Demijohn Flat National Register District. (E-14) That is a compelling reason to make the route nonmotorized.2. To the NE of this route is the Burnt Timber Canyon WSA. To the SW of this route is a proposed LWC. This route forms the boundary of both. There is no good reason for this motorized corridor. Closing this route to motorized use would allow a 1 ½ mile common boundary between the WSA and LWC greatly strengthening both.3. This dead end route provides an "attractive nuisance" tempting people to drive beyond the designated end. Monitoring and enforcement will require regular 3 mile round trip excursions from Crooked Creek Rd by BLM LEOs. This is unlikely to happen often due to staff limitations. Efficient, effective monitoring and enforcement would be much easier if PM1019 was designated non-motorized from the junction with Crooked Creek Rd.4. This route could provide an easy hiking opportunity from Crooked Creek Rd, with a trailhead accessible without 4WD vehicles. Most people can walk. We have seen people in the Pryors park their UTV and go for a hike; it is likely that many riders, as with automobile drivers, would take advantage of the opportunity to complement their ride with a chance to stretch their legs. It is no more logical to assume that ORV users are incapable of walking than it is to assume that people in cars cannot do so. Many people like to walk and visit the Pryors specifically to hike -" especially away from motor vehicles; the cultural and archeological values of the Demijohn Flats area are clearly enhanced by the opportunity to experience and contemplate them free from the distraction of vehicle noise and dust. Longer hikes south into the Burnt Timber Canyon LWC (Penney Peak area) are also possible beginning on this route	n	<p>Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS</p> <p>The BLM staff has also reviewed the preliminary decision for PM 1019 (Demijohn Flat Road) and has changed the route status in the RMP from motorized to non-motorized (administrative access only) and along with PM 1022, PM 1038 and PM 1021 will also be designated as a non-motorized trail for general public use.</p>
DR-MTDK-BL-	Edits	I note that BLM maps such as the key map at: http://www.blm.gov/mt/st/en/fo/billings_field_office/rmp/drmp/travel_management	n	Thank you for your comment. Text has been edited in response to your comment.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
13-0363-1		/pryors.htmlshow some CNF roads that are not motor legal and do not show some CNF roads that are motor legal. Furthermore the map gives incorrect and nonexistent names for some routes. (e.g. FS 73 on two different roads and incorrect on both, Cty 282B on two different roads) (The reverse is true of CNF maps and BLM roads.)		
DR-MTDK-BL-13-0363-2	Travel mngt	Sykes Ridge Rd is now as challenging to drive with my4Runner as it was with the Subaru. And it continues to get worse. What has changed? ATVs -“ lots of ATVs. ATVs (and UTVs) do not have a differential. Unless they are going absolutely straight (almost never on such roads), one wheel on each axel must be slipping on the ground because the two wheels are tracking on circles of different radius. Thus ATVs are constantly wearing on the road in a way that standard 4WD vehicles with differentials do not. Cumulatively they have the same impact as tracked vehicles which are forbidden. It would probably be impossible to see the effect of one pass or even ten passes. But with many hundreds of passes over a period of years there is a major erosional impact. This effect is multiplied by the fact that typically ATVs carry only one rider, while 4WDs typically carry 2, 3, or more. This increases the impact per visitor by a factor of 2 or 3 beyond the fact that each ATV wears the road surface more than a 4WD	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS.
DR-MTDK-BL-13-0371-1	Travel mngt	Close Demijohn Flat route to motorized travel to protect the Burnt Timber Canyon ACEC. 3. Deny motorized access past the mouth of Bear Canyon because 2 other routes leading to the same general area are less than 3 miles away. 4. Designate Bear Canyon Trail and Big Sky Trail for quiet, non-motorized users.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS In regards to the Bear Canyon route, the RMP has a range of possible decisions. In this case, due to the conditions you mentioned the Alternative D has been modified to reflect the current conditions. The route will be designated as “closed” to vehicle use and as a non-motorized trail. Refer to map 146 Also note that BLM Manual 1626 (Travel and Transportation) specifies that BLM establish a comprehensive program for both motorized and non-motorized travel. This will be done in this RMP Please note that the Pryor Mtn TMA is to protect wilderness values, cultural assets, visual characteristics, sensitive plants, fragile and erosive soils, wild horses and wild horse habitat.
DR-MTDK-BL-13-0381-1	NEPA	BLM must recognize, therefore, that not all uses need to be authorized everywhere in the analysis area in order to provide for multiple uses. On the contrary, with Montana's iconic prairie lands at stake, BLM needs to provide	N	Thank you for your comment. (non substantive)

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		more balance in the RMP. More land needs to be set aside for sage-grouse and wildlife habitat and more lands need to be off-limits to OHV use and mineral development in order to provide for opportunities for quiet recreation and backcountry hunting opportunities.		
DR-MTDK-BL-13-0381-10	lands with wilderness characteristics, NEPA	We also recommend that all lands with wilderness characteristics be included in a Master Leasing Plan (MLP) so that more care can be given to how these areas are managed for uses and values other than oil and gas (oil and gas should not dominate over other important resource values, including wilderness character and wildlife habitat). Including these areas in a MLP will provide an in-depth NEPA analysis on detailed closures, protective stipulations, and site-specific impacts that would come with any leasing in this sensitive area. While the proposed RMP revision underway is expected to provide broad guidance for leasing availability and general stipulations for wildlife habitat, it will not provide the crucial "look before you leap" in depth analysis of the specific resource values in an area. It is important that lease stipulations ensure necessary protection of public lands already leased and that non-waivable no surface occupancy stipulations be attached to leases that could threaten important wildlife habitat or use areas, water resources, recreation areas, historic sites etc., particularly if site-specific impacts are unknown or poorly known.	n	Thank you for your comment. Please see Chapter 1, section 1.4.1.3.1 – Issues considered but not further analyzed.
DR-MTDK-BL-13-0381-11	lands with wilderness characteristics	Regarding whether the Bear Creek area provides outstanding opportunities for primitive recreation, the inventory form says "yes." There "are outstanding opportunities for primitive recreation due to the presence of prehistoric carving on the cliffs of Petroglyph Canyon in the eastern portion of the unit. Although not well known or advertised, this region does have primitive recreation currently occurring on it and users appear to come from local, regional, and possibly national regions. The BLM has not, but may in the future, be required to actively manage this activity if use levels continue to increase. There are no permitted commercial outfitters currently using that area but there may be unauthorized guide services operating." The final summary notes that "a portion of the unit does offer outstanding opportunity for primitive recreation, but not the entire unit. There is not an outstanding level of solitude present." Again, however, the direction provided in BLM Manual 6310 is to not disqualify an area based on a finding that outstanding opportunities exist in only a portion of the area.	n	The BLM staff has reviewed the field work and documentation which was done previously for this unit, both by them and the documentation submitted by you. In light of this new data and the review, the team has determined that there are areas which possess outstanding levels of primitive recreation. The area was initially disqualified from further consideration, however, based on comments and supporting documentation, a review by BLM staff has determined that a portion of the unit (approximately 5,658 acres in size) does possess wilderness characteristics. Please see Appendix K and the lands with wilderness characteristics sections in chapters 1, 2, 3, and 4 for further discussions.
DR-MTDK-BL-13-0381-12	lands with wilderness characteristics	size and naturalness were found to exist in the Dry Creek Unit, in addition to a very low incidence of human visitation, this unit should be acknowledged as possessing wilderness characteristics.	n	The BLM staff has reviewed the field work and documentation which was done previously for this unit, both by them and the documentation submitted by you. In light of this new data and the review, the team has determined that there are areas which possess outstanding levels of primitive recreation. The area was initially disqualified from further consideration, however, based on comments and supporting documentation, a review by BLM staff has determined that a portion of the unit (approximately 5,658 acres in size) does possess wilderness characteristics. Please see Appendix K and the lands with wilderness

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
				characteristics sections in chapters 1, 2, 3, and 4 for further
DR-MTDK-BL-13-0381-13	lands with wilderness characteristics	BLM should not drop the Bad Canyon Unit (2,036 acres) or the Weatherman Draw Unit (11,603 acres) from managing for wilderness characteristics in the preferred alternative. The Bad Canyon Unit, in addition to meeting the minimum size and possessing wilderness characteristics should be managed for wilderness values because it includes significant ecological and recreational values. The Unit is dissected by Bad Canyon Creek which is part of a Riparian Priority Recovery Area (an ecological value). The Bad Canyon Unit also provides outstanding opportunities for solitude	n	Thank you for your comments. The management actions for the areas you have identified have many appropriate measures to protect the resources without the formal designation. Please see the maps 11, 23, 57, 71, and map 156. Also note that there is no motorized access to the unit. Please see the end of Table 2.6.1 for Lands with Wilderness Characteristics management prescriptions and then refer to other sections in the table for the specific areas and their management prescriptions – many have the same regardless of designation
DR-MTDK-BL-13-0381-14	ACEC	To protect and give priority to existing and new ACECs, BLM should do everything within its authority to revise conditions of approval for existing leases, as necessary. We also recommend that the Steamboat Butte area be designated an ACEC. The area is not currently listed as an ACEC and is not being recommended for designation in the draft RMP. This is a mistake. The area hold significant paleontological and cultural resources and is listed under several hiking sites so it does receive some non-motorized recreational use.	N	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the B&PPNM RMP/EIS See appendix E for an evaluation of Steamboat Butte.
DR-MTDK-BL-13-0381-15	lands with wilderness characteristics	In the DEIS, BLM includes very little information on how the proposed action may impact the four WSAs in the analysis area. There is simply not enough information in the DEIS to properly assess how and whether the proposed action -“ which includes designating areas for oil and gas development, OHV use on ways (as well as increased levels of OHV use on such ways), logging, rights-of-way and other uses -“ near, adjacent, and/or within WSAs will comply with FLPMA's non-impairment mandate for the WSAs in the analysis area.	n	BLM management actions within WSAs are governed by the BLM Manual 6330- Management of Wilderness Study Area. All projects require specific NEPA analysis of an EA level, except those involving emergencies actions. In regards to your specific concerns, the Travel Management decisions in the RMP do not have any motorized routes designated as “open” within BIFO WSAs. Please see table 2.63, Page 2-168 Except as described in section 1.6.D.4.4 (access) of BLM Manual 6330 (page 1-20) no new Rights-Of-Way will be approved for uses which do not satisfy the Non-impairment standard. This is also found in Table 2-6.3 on page 2-168 of the RMP In regards to your concern of oil and gas leasing within WSAs, the BLM Manual 6330, page 1-22., does not allow for any new oil and gas leasing. This is also found in Table 2-6.3 on page 2-168 of the RMP In regards to logging, commercial forest product removal is generally not allowed (see pages 1-35 of Manual 6330), however vegetation may be removed only as an exception from the non-impairment standard for such reasons as public safety, emergencies, and insect and disease control. Please see page 1-33 of Manual 6330 for vegetation management prescriptions. This is also found in Table 2-6.3 on page 2-168 of the RMP Management of the WSAs is governed by BLM Manual 6300. By policy, no WSAs can be designated for oil and gas development (see RMP maps 160 and

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
				161, and Manual 6330, page 1-22 for comparison with maps 54 to maps 57), OHV use must be restricted to designated routes or closed (RMP Maps 143 to 146 and BLM Manual 6300, pages 1-27 to 1-29 for comparison) etc. In chapter 2, tables 2.5, 2.61 and 2.63 there are discussions of actions which affect WSAs. All actions in WSAs are in accordance with existing Rules, regulations, and policies.
DR-MTDK-BL-13-0381-16	WSR, Travel mgmt	more information is required in the DEIS in order to submit meaningful public comments. Specifically, more information is required on: (1) the existing system of routes (roads and trails) in the analysis area including the location (as depicted on a map) and total mileage of routes; (2) BLM's inventory for eligible wild and scenic rivers; and (3) BLM's Section 106 of the National Historic Preservation Act (NHPA) inventory for cultural and historic properties.	n	thank you for your comment. More information on WSR can be found in appendix kl. Results of cultural inventories [proprietary information and cannot be included in public documents.
DR-MTDK-BL-13-0381-17	NEPA	it is important that the NEPA process and draft RMP carefully consider and incorporate the best available science on climate change and impacts to native wildlife species, especially sage grouse. In addition, BLM's inventory for eligible wild and scenic rivers must (but currently does not) satisfy NEPA's "best science" standard.	N	Thank your for your comment. Please see Appendix R for the WSR evaluation and analysis.
DR-MTDK-BL-13-0381-18	NEPA	This proposed action may have significant, direct impacts on the area's resources, including but not limited to ACECs, WSAs, lands with wilderness characteristics, cultural and historic properties, surface water resources (rivers, streams, creeks, lakes, ponds, wetlands), groundwater resources, soils, native vegetative communities, fish and aquatic species, native wildlife, big game species (pronghorn, elk, deer (mule and white-tailed), big horn sheep), game birds (including greater sage grouse), and special status species including, but not limited to listed and candidate species for protection under the federal Endangered Species Act ("ESA") and species of concern (both federal and state). BLM, therefore, must take a hard look at the direct impacts of the revised RMP on these important resources.	N	Thank you for your comment. The requisite level of information necessary to make a reasoned choice among the alternatives in an EIS is based on the scope and nature of the proposed decisions. As the EIS analyzes land use planning-level decisions, which by their nature are broad in scope, the requisite level of data and information is more generalized in order to apply to a wide-ranging landscape perspective. Although the BLM realizes that more data, and more site specific data, could always be gathered, the baseline data utilized in the EIS provide the necessary basis to make informed land use plan-level decisions. The BLM considered the availability of data from all sources, adequacy of existing data, data gaps, and the type of data necessary to support informed management decisions at the land-use plan level. The data needed to support broad-scale analysis of the BLM Billings planning area are substantially different than the data needed to support site-specific analysis of projects. The RMP/EIS data and information is presented in map and table form and is sufficient to support the broad scale analyses required for land use planning. Additionally, the BLM used the most recent and best information available that was relevant to a land-use planning-level analysis including the Baseline Environmental Report ([BER]; Manier et al. 2013). The BER assisted the BLM in summarizing the effect of their planning efforts at a range-wide scale, particularly in the affected environment and cumulative impacts sections. The BER looked at each of the threats to greater sage-grouse identified in the Fish

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
				<p>and Wildlife Service’s “warranted but precluded” finding for the species. For these threats, the report summarized the current scientific understanding, as of the BER’s publication date (June 2013), of various impacts to greater sage-grouse populations and habitats. The report also quantitatively measured the location, magnitude, and extent of each threat. These data were used in the planning process to describe threats at other levels, such as the sub-regional boundary and WAFWA Management Zone scale, to facilitate comparison between sub-regions. The BER provided data and information to show how management under different alternatives may meet specific plans, goals, and objectives.</p> <p>The BLM consulted with, collected, and incorporated data from other agencies and sources, including but not limited to the U.S. Fish and Wildlife Service, and the Montana Fish, Wildlife and Parks. Additional information provided by state and local governments regarding socioeconomics also support the analysis in Chapter 4.</p> <p>As a result of these actions, the BLM gathered the necessary data essential to make a reasoned choice among the alternatives analyzed in detail in the Draft RMP/EIS, and provided an adequate analysis that led to disclosure of the potential environmental consequences of the alternatives (see Chapter 4, Environmental Consequences and Cumulative Effects). As a result, the BLM has taken a “hard look,” as required by the NEPA (see 40 CFR 1502.16), at the environmental consequences of the alternatives in the Draft RMP/EIS to enable the decision maker to make an informed decision.</p> <p>As noted in more detail in responses to issue statements identified elsewhere in the report, the BLM has complied with the myriad applicable laws, policies, and guidance in developing the RMP/EIS. Section 2.2, Developing the Range of Alternatives, of the RMP/EIS, states that all alternatives would comply with state and federal laws, regulations, policies, and standards, and implement actions originating from laws, regulations, and policies. Additionally, in Section 1.4.2, Planning Criteria, of the Draft RMP/EIS, the BLM has a criterion stating that all alternatives would comply with existing laws, regulations, and policies. The BLM has reviewed all actions in the Proposed RMP/Final EIS and found them to be consistent and within the bounds of all required laws, regulations, and policies. Further details regarding BLM compliance with state, county, and local plans and policies can be found in Section 1.5, Consistency with Other State, County, or Local Plans, of this report.</p>
DR-MTDK-BL-	NEPA	The drastic and alarming decline in the natural habitat and numbers of greater sage-grouse (along with other game species such as pronghorn, sharp-tailed	N	Thank you for your comment.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
13-0381-19		grouse, mule deer and non-game species like plover, Sprague's pipit, badger, jack rabbit, prairie dogs, and ferrets), in particular, requires special attention. BLM must take a hard look at how the proposed action directly (and, as discussed below, indirectly and cumulatively) impacts these important natural resources. Oil and gas development and ever increasing motorized access and use of public lands has resulted in the overall loss and degradation that is putting sage grouse and other species in peril. The impacts, therefore, must be carefully analyzed by BLM.		Please see Chapter 4 for impact analysis.
DR-MTDK-BL-13-0381-2	Wildlife	In greater sage-grouse priority protection areas, we recommend the following protective measures: close all areas to oil and gas drilling and exploration (or at the very least include NSO stipulations on all areas); allow all existing leases to expire (no renewal); take steps to minimize all adverse impacts to the resource; exclude areas from ROWs and consider opportunities to remove, bury, or modify powerlines; reclaim and restore any previous development in the areas; evaluate existing range improvements and modify, as necessary, to conserve, enhance, and restore habitat; withdraw area from locatable mineral entry; mineral material sales would require a plan to maintain habitat; and no new road construction (only maintenance of existing roads)	n	Thank you for the comment. Your protective measure suggestions will be considered when alternatives are selected in the Final RMP/ EIS.
DR-MTDK-BL-13-0381-20	NEPA	Here, the DEIS fails to properly address indirect impacts of offering widespread oil and gas development, OHV use on "existing" roads and trails and on designated routes in 11 TMAs, and authorizing livestock grazing on 387,057 acres on the various resources of the analysis area, including but not limited to ACECs, WSAs, lands with wilderness characteristics, cultural and historic properties, water resources (both surface and groundwater), fish and aquatic species, and native wildlife species (including big game, sage grouse, and special status species).	N	Thank you for your comment. Chapter 4 of the RMP/EIS provides a detailed description of the environmental and socio-economic consequences of implementing the alternatives presented in Chapter 2.
DR-MTDK-BL-13-0381-21	NEPA	In this case, BLM neglected to properly consider and analyze the cumulative effects of the proposed action. For example, in addition to the proposed action, there are a number of state, private, and other federal actions as well as natural occurrences or events taking place (or proposed to take place) in the analysis area including, but not limited to mining, oil and gas development, livestock grazing, irrigation, utility corridors, coal mining, private land development, logging and thinning (and associated developments), prescribed burning, recreation, energy development, travel planning, OHV use, climate change, and water developments. By themselves, these activities may have "individually minor" effects. A small area of wildlife habitat may be adversely affected by oil and gas activities or fragmented by existing and/or new designated routes. Lands with wilderness characteristics may be harmed by the sounds of an oil and gas rig or pre-existing mining operation, scarred by a new system route, or dissected by pasture and allotment fences. Individually, each of these incidents - "though serious -" may not rise to the level of posing a significant risk to the	N	Thank you for your comment.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		area's wilderness character or wildlife habitat. Collectively, however, the impacts of all of these and other activities - " whether conducted by private individuals, state agencies, or other federal agencies -" may be significant and must be analyzed.		
DR-MTDK-BL-13-0381-22	NEPA	No alternatives explore various ways to provide protections and mitigation for wildlife during the leasing or permitting process, i.e., incentives to protect large blocks of undeveloped land for wildlife habitat and wilderness values, clustering development, using timing restrictions and limitations (either as a lease stipulation or at the time of permitted), and incorporating detailed reclamation plans. Nor does the DEIS explore alternatives that to seek to revise conditions of approval for applications for permits to drill (APDs) based on updated scientific information. The same is true with respect to livestock grazing (all alternatives make 434,154 acres available for grazing and permit grazing on 386,000 acres), special designations for sage grouse, and travel planning.	N	Thank you for your comment. Please see Chapter 2 for a discussion on alternative development.
DR-MTDK-BL-13-0381-23	NEPA	the BLM failed to: (1) explore an alternative that accommodates the short, mid, and long-terms needs of greater sage-grouse and other periled species; and (2) explore a real "no action" alternative as required by NEPA. BLM's purported "no action" alternative actually authorizes a host of activities in the analysis area, including oil and gas, OHV use, and livestock grazing.	N	Thank you for your comment. 1) Please see Alternative B and appendices AA and AB to see how the BLM has incorporated guidance from the Sage-Grouse National Technical Team into this document. 2) For the purposes of land use planning actions (ex. RMP/EIS): The No Action Alternative is to continue to implement the management direction in the land use plan (i.e., the land use plan as written). Any other management approach should be treated as an action alternative. (from: BLM Manual H-1790-1 page 52)
DR-MTDK-BL-13-0381-24	cultural	the DEIS explains that the environmental analysis of impacts to cultural and historic properties in the planning area is primarily based on a Class I inventory (approximately 4.5% of the planning area, however, has been subjected to a Class III inventory).Based on information provided in the DEIS it appears that BLM: (1) does not consider the RMP to be an undertaking triggering the need to conduct Class II and Class III inventories now; (2) only commits to doing additional inventories if new surface disturbance occurs; and (3) has not undertaken a Class II or Class III inventory before authorizing various, site-specific activities within the analysis area. BLM's approach is inconsistent with the NHPA, the implementing regulations, and BLM's own guidance.	n	Thank you for your comment. On-the-ground (Class II and Class III) cultural inventories are done at the implementation level. Please see text in Chapter 1 (1.4.3) for a definition of land use plan decisions and implementation level decisions. The NHPA requires federal agencies to consider effects of federal undertakings on historic properties prior to making a decision or taking an action. Federal agencies meet this requirement by completing the Section 106 consultation process set forth in the regulations, including consulting with certain specified parties, such as the state historic preservation officer and Native American tribes, if relevant. Under Section 106, the process concludes with an agency finding of "no historic properties affected," "no adverse effect," or "adverse effects." 36 CFR 800.6. NEPA, expanded the environmental review process to require federal agencies

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
				<p>to consider effects of proposed federal actions on the environment more generally. Federal agencies meet the NEPA requirement by preparing an environmental review document, which consists of a categorical exclusion (CE), an environmental assessment (EA) or an environmental impact statement (EIS), depending on the level of potential impacts.</p> <p>Neither statute mandates a particular outcome, but rather under both statutes, the impacts must be considered and the required processes must be followed.</p>
DR-MTDK-BL-13-0381-25	NEPA	<p>not enough information is provided in the DEIS to properly assess NHPA compliance. Second, the proposed action (or at least certain aspects of it) qualify as an undertaking triggering the need -"now -" to undertake a reasonable and good faith effort to identify cultural and historic properties. For example, the proposed action includes designating routes for motorized use in 11 TMAs. This is clearly an undertaking that will result in increased surface disturbance. Third, BLM should keep in mind that authorizing new surface disturbing activities is not a pre-requisite to qualify as an undertaking. According to BLM's own guidance, where there is a reasonable expectation that a proposed designation will shift, concentrate or expand travel into areas where historic properties are likely to be adversely affected a Class III inventory is required prior to designation. BLM's decision to designate 11 TMAs, therefore, triggers the need for a Class III inventory.</p>	N	<p>Thank you for your comment. On-the-ground (Class II and Class III) cultural inventories are done at the implementation level. Please see text in Chapter 1 (1.4.3) for a definition of land use plan decisions and implementation level decisions.</p> <p>The NHPA requires federal agencies to consider effects of federal undertakings on historic properties prior to making a decision or taking an action. Federal agencies meet this requirement by completing the Section 106 consultation process set forth in the regulations, including consulting with certain specified parties, such as the state historic preservation officer and Native American tribes, if relevant. Under Section 106, the process concludes with an agency finding of "no historic properties affected," "no adverse effect," or "adverse effects." 36 CFR 800.6.</p> <p>NEPA, expanded the environmental review process to require federal agencies to consider effects of proposed federal actions on the environment more generally. Federal agencies meet the NEPA requirement by preparing an environmental review document, which consists of a categorical exclusion (CE), an environmental assessment (EA) or an environmental impact statement (EIS), depending on the level of potential impacts.</p> <p>Neither statute mandates a particular outcome, but rather under both statutes, the impacts must be considered and the required processes must be followed.</p> <p>Please see Appendix ___ for the response from SHPO regarding cultural resources and travel management. Cultural resources were addressed as part of each route evaluation. See individual route reports.</p>
DR-MTDK-BL-13-0381-26	Travel mngt	<p>First, BLM never analyzes the direct, indirect, and cumulative impacts of designating system of routes for motorized use in the 11 TMAs and limiting motorize use to "existing" roads and trails outside the 11 TMAs on the various resources in the analysis area, including but not limited to lands with wilderness characteristics, ACECs, WSAs, native wildlife (including but not limited to, big game habitat and sage grouse habitat), soils, cultural and historic properties, and water resources. Important security areas for big game species, for instance, will continue to be carved up under BLM's hands off approach.</p>	n	<p>The Billings Field Office has initiated a new effort in FY 2014 to inventory all transportation routes outside of the TMAs. All of these routes will be designated as "existing" and these will serve as the baseline for the transportation system, both motorized and non-motorized.</p> <p>In lands which have been inventoried for their Wilderness characteristics, all the areas are managed as "limited" and all the areas were within TMAs which will have designated travel systems for non- motorized and motorized travel. Also note that all routes will be termed "primitive roads" if motorized use is allowed</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		<p>Second, no effort is made to inventory, document, and map the "existing" system of routes outside the 11 TMAs. As such, it is impossible for BLM to analyze the impacts of such routes (and for the public to comment on the impacts of such routes) in the absence of a comprehensive inventory documenting and mapping all existing routes in the analysis area. The baseline condition will continue to change and likely get worse before a comprehensive travel plan for the entire planning area is developed (OHV use is on the rise). Third, as per Tri-State, no new user-created routes were to be created in the analysis area. Motorized use was to be restricted to existing routes that existed in 2003 (when the ROD was signed), subject to a few exceptions. BLM, however, has taken no steps to document the existing system of routes that existed in 2003. Nor is BLM attempting to do so now. What is preventing members of the public from creating new "existing" routes in the analysis area prior to adoption of the RMP and any future travel plan? And, how will BLM even know such routes are "new" given that lack of a comprehensive inventory? BLM concedes that the number of "existing" routes may change prior to completing a travel plan for the region. This is a violation of NEPA, Tri-State, E.O. 11644, and 43 C.F.R. § 8342. Fourth, in creating the 11 TMAs, there is no evidence in the DEIS or draft RMP that BLM considered and applied the minimization criteria (outlined above). This is a violation of E.O. 11644 and BLM's implementing regulations. Fifth, BLM should designate a system of routes (roads and trail) for the entire planning area (not just 11 TMAs) and not leave it up to whatever may be perceived as an "existing" route. As mentioned above, these routes should be depicted on a map and undergo a NEPA and minimization criteria analysis. BLM should also determine where lands fall on the Recreational Opportunities Spectrum (ROS). Managing an area as semi-primitive or even semi-primitive motorized, might help when lay the ground work for future travel planning. Sixth, until a travel plan is developed for areas outside the 11 TMAs, BLM should limit motorized travel to designated routes in areas where a wilderness inventory has been conducted. Through the wilderness inventory process, BLM has already identified existing routes and no new vehicle routes should be created before the travel planning process begins, which probably will not be completed for many years.</p>		<p>and as "trails" if not.</p>
DR-MTDK-BL-13-0381-27	Travel mgnt	<p>If BLM is going to defer travel planning outside the 11TMAs until after a ROD approving the new RMP is signed, we recommend the Agency initiate the planning and NEPA process for a travel plan as soon as practicable to avoid the creation of additional "existing" routes and further harm and impacts to the region's resources.</p>	n	<p>Based in part on public concerns similar to your comments, but also from discussions among the agency staff, and for the same reasons you have brought up, The BiFO has initiated a new travel planning process to establish the route baseline for lands outside the TMAs in the BIFO. The work is planned to be done in FY 2014.</p>
DR-MTDK-BL-13-0381-	Travel mgnt	<p>BLM must also come up with an action plan and planning schedule to indicate areas that will have travel planning completed concurrently with the RMP process and which areas will be deferred. BLM Handbook 8342(IV) (B).</p>	n	<p>Thank you for your comments. BLM will develop a schedule for TMA planning as is required in the BLM 1626 Manual (Travel and Transportation).</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
28				
DR-MTDK-BL-13-0381-29	Travel mnngt	BLM must immediately close any areas where the agency finds that off-road vehicles are or will cause considerable adverse effects upon natural or cultural resources. 43 C.F.R. § 8341.2. BLM has policy guidance describing how RMPs and travel plans should address temporary closures including defining thresholds for when OHV related closures will take place. BLM should issue temporary closures for any area where OHVs are currently harming or may harm natural or cultural resources in the interim period before BLM can designate the appropriate travel network.	n	The BLM follows 43 CFR 8240, BLM Handbook 1626, Technical Reference 9113-1 Planning and Conducting Route Inventories, as well as several Executive Orders (especially 11664) and Acts of Congress, including the Wilderness Act and FLPMA in designing and managing its Travel and Transportation system management.
DR-MTDK-BL-13-0381-3	NEPA	In the DEIS, BLM mentions that many areas will not be given over-lapping designations. Greater sage-grouse priority protection areas, for instance, would not also be designated ACECs. And, BLM is recommending that an area within existing WSAs be removed from the East Pryor ACEC due to overlapping or pre-existing protections.	N	Thank you for your comment. ACECs are proposed where special management attention is required to protect the important and relevant values in relationship to the BLM preferred alternative in the RMP. Should other management be proposed for these areas through the RMP process that protects the relevant and important values and ACEC designation is not necessary. As WSAs contain the most restrictive management, there is no need for an ACEC to overlap the WSA. The relevant and important values of the East Pryor ACEC are addressed through the management of the WSAs.
DR-MTDK-BL-13-0381-30	WSR	Under the WSRA, Congress explicitly limited a suitability determination for eligible rivers to eight items. These items include: (1) a description of the area (with maps); (2) the eligibility characteristics (free-flowing and ORVs); (3) status of landownership; (4) reasonably foreseeable future uses that would be enhanced, foreclosed, or curtailed if included; (5) the Federal agency administering the area; (6) the extent to which costs are shared by the state; (7) the costs to the U.S.; and (8) the degree to which the state may participate in protection and administration of the river. See 16 U.S.C. § 1275 (a); § 1276 (c). It is unclear if BLM appropriately applied these eight items. More information is needed. Notably, in other contexts, BLM has illegally transformed the WSRA's suitability factors into a subjective and political determination that offers cover for all decisions to reject rivers as unsuitable. In so doing, BLM is illegally standing in Congress' shoes, rejecting rivers as unsuitable based on purely political grounds.	Y	Thank you for your comment. The BIFO did do a Suitability Study as part of this planning effort. It appears that the document was inadvertently left out of the document. It has been inserted into Appendix R, after the Eligibility Study Report.
DR-MTDK-BL-13-0381-31	WSR	Before making a final decision on whether or not a river is "suitable" for inclusion in the NWSRS in the Billings District, BLM must analyze that decision in a NEPA document. See 47 Fed. Reg. at 39456. The document must include an assessment of the impacts of the decision (direct, indirect, and cumulative), an alternatives analysis, and be submitted for public review and comment. Id. Each "river study report will be a concise presentation of the information required in sections 4 (a) and 5 (c) of the Act as augmented by the Council on	Y	Thank you for your comment. The BIFO did do a Suitability Study as part of this planning effort. It appears that the document was inadvertently left out of the document. It has been inserted into Appendix R, after the Eligibility Study Report.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		Environmental Quality regulations implementing the procedural provisions of the [NEPA]." 47 Fed. Reg. 39456. The Interagency Wild and Scenic River Council's technical papers and agency policy documents (Forest Service Handbook and BLM Manual) have followed suit by recognizing NEPA's applicability to the study report process. At present, this detailed information is lacking in the DEIS. BLM has not assessed the impacts of and alternatives to its suitable determination.		
DR-MTDK-BL-13-0381-32	NEPA	In addition to BLM's suitability determination, more information on why certain rivers or segments thereof were deemed ineligible is also required. Indeed, missing from the DEIS is the actual inventory documenting the standards and methods used and how the Agency reached its determinations for other rivers or segments thereof in the planning area. The public does not know why specific rivers and streams (or segments thereof) were deemed not to possess outstanding remarkable values. In order to submit meaningful public comment on the DEIS, the BLM must provide the actual inventory of eligible rivers and explain its methodology for identifying eligible and non-eligible rivers. For example, BLM suggests that to be deemed an outstandingly remarkable value it must be "exemplary," "significant," or be "nationally or regionally" important. BLM cites no authority to support such a high standard and we are not aware of any in the Wild and Scenic Rivers Act (WSRA) or the 1982 Interagency Guidelines.	N	Thank you for your comment. Please see Appendix R for the WSR evaluations, as well as the eligibility and suitability reports. The BIFO did do a Suitability Study as part of this planning effort. It appears that the document was inadvertently left out of the document. It has been inserted into Appendix R, after the Eligibility Study Report.
DR-MTDK-BL-13-0381-33	NEPA	BLM, therefore, needs to go back -"under the appropriate standard for eligibility - "and reevaluate all rivers within the analysis area. Particular attention should be placed on rivers that have both ecological, fish and wildlife, and historic/cultural values -"in particular those areas inhabited and/or used by Native Americans and the Lewis & Clark expedition.	N	Thank you for your comment. Please see Appendix R for the WSR evaluations, as well as the eligibility and suitability reports. The BIFO did do a Suitability Study as part of this planning effort. It appears that the document was inadvertently left out of the document. It has been inserted into Appendix R, after the Eligibility Study Report.
DR-MTDK-BL-13-0381-4	lands with wilderness characteristics	BLM finalized an original inventory of lands with wilderness characteristics in the 1980s (the Montana Wilderness Inventory) and has since updated that inventory with new information. Pursuant to BLM's inventory for the DEIS, six tracts of land in the Pryors Unit, two tracts of land in the Burnt Timber Unit, one tract in the Weatherman Draw Unit, one tract in the Meeteetse Unit, and one tract in the Bad Canyon Unit possess wilderness characteristics. The total acreage of land (all eleven tracts) amounts to 27,292 acres.	n	Thank you for your comments and review of the lands with wilderness characteristics inventory process as well as the RMP in whole. Please see the end of Table 2.6.1 for Lands with Wilderness Characteristics, management prescriptions, and then refer to other sections in the table for the specific areas not found to possess wilderness characteristics and their management prescriptions – many have the same regardless of designation
DR-MTDK-BL-13-0381-5	lands with wilderness characteristics	details on BLM's inventory being included in the DEIS (Appendix K). BLM's guidance explains the "Affected Environment" section of the NEPA document used to support the planning decision must "describe the inventory process, summarize any information received from the public, and incorporate inventory information by reference. The NEPA document should also include a brief description of each land with wilderness characteristics, including a map delineating the boundaries of each such area and the acreage." BLM Manual 6320. The "Environmental Consequences" section of the NEPA document should "describe the direct, indirect, and cumulative effects of (1) various alternatives on lands with wilderness characteristics and (2) managing to protect	n	Thank you for your comments. Suggested information to be included in the RMP has been included in the document. See Chapter 3 and Appendix K.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		lands with wilderness characteristics on other affected resources." Id.		
DR-MTDK-BL-13-0381-6	lands with wilderness characteristics	existence of two-tracks on the landscape -" unlike roads -" should not disqualify an area as land with wilderness characteristics or even count as a strike against managing such lands for wilderness characteristics. Nor should other human intrusions i.e. , fencing, stock ponds, that are minor and substantially unnoticeable be used to disqualify areas from being managed for wilderness character. The same is true with respect to mineral leases, ROWs, or other undeveloped interests. As stated in BLM Manual 6310, undeveloped ROWs and similar undeveloped possessory interests (e.g. mineral leases) are not treated as impacts to wilderness characteristics because these rights may never be developed.	n	This topic is discussed in Chapter 3 under Land with Wilderness Characteristics. The inventory update was completed following guidance contained in IM-2011-154 and BLM Manuals 6310 and 6320.
DR-MTDK-BL-13-0381-7	lands with wilderness characteristics	BLM Manual 6310 sets forth guidance on how the BLM determines whether an inventory unit possesses outstanding opportunities for solitude and/or primitive and unconfined recreation, either of which is required to exist in order for an area to possess wilderness characteristics (among the other requirements). Two key provisions of the manual seek to minimize the tendency in which inventory units are discounted because outstanding opportunities may not exist on every acre, and also instances where units are compared relative to other areas nearby. BLM is instructed not to disqualify an area based on a finding that outstanding opportunities exist in only a portion of the area and is not to compare the lands in question with other parcels." Furthermore, BLM is to only consider the impacts of sights and sounds from outside the inventory area on the opportunity for solitude if these impacts are pervasive and omnipresent. "Notably, BLM's Manual 6310 explains that "outstanding opportunities for solitude can be found in areas lacking vegetation or topographic screening. A small area could also provide opportunities for solitude if, due to topography or vegetation visitors can screen themselves from one another."	N	Thank you for your concerns and comments. Based on these comments, the BLM staff has reviewed its findings in all the lands with wilderness characteristics units and has determined that a portion of the Bear Canyon Unit does meet the definition of possessing lands with wilderness characteristics qualities. Accordingly, the RMP document has been revised to reflect this change. Please see the lands with wilderness characteristics text in chapter 2, 3, and 4 for the discussion of this unit. BLM follows Manual 6301 in conducting its wilderness inventories and Manual 6302 when considering lands with wilderness characteristics during planning. These Manuals implement Secretarial Order 3310 and incorporate principles from BLM guidance (Organic Act directives) and legal rules developed as part of BLM's original wilderness inventories.
DR-MTDK-BL-13-0381-8	lands with wilderness characteristics	BLM should also impose reasonable measures on existing and future leases (based on new findings and the need to manage the wilderness and wildlife values) and commit not to lease these areas once the existing leases expire.	n	Thank you for expressing your concerns and your comments have been included in the RMP administrative record. Please see the end of Table 2.6.1 for Lands with Wilderness Characteristics, management prescriptions, and then refer to other sections in the table for the specific areas not found to possess wilderness characteristics and their management prescriptions – many have the same regardless of designation
DR-MTDK-BL-13-0381-9	lands with wilderness characteristics	Additional protective measures in lands with wilderness character (as well as sage grouse areas, ACECs, WSAs, and other sensitive areas) include providing lease-holders with incentives to protect large blocks of undeveloped land for wildlife habitat and wilderness values, clustering development, using timing restrictions and limitations (either as a lease stipulation or at the time of permitted), and incorporating a detailed reclamation plan. Also, if lands identified as having wilderness characteristics are developed for oil and gas, the plan should expressly state that they will be restored and managed for wilderness	n	Thank you for your comment. Many of your suggestions are existing oil and gas stipulations (CSUs, TL, etc.) This topic is discussed in a range of alternatives in Chapter 2 under Wilderness Characteristics. The text has been clarified in the Proposed RMP/Final EIS in response to this comment. Please see the end of Table 2.6.1 for Lands with Wilderness Characteristics, management prescriptions, and then refer to other sections in the table for the specific areas/units not found to possess wilderness characteristics and their

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		values upon completion of the oil and gas drilling.		management prescriptions – many have the same regardless of designation
DR-MTDK-BL-13-0383-1	WILD HORSES, PMWHR	Please work with the Forest Service to include the open meadows and Tony Island Spring in the mountaintop range. Please work with the National Park Service to reintroduce the Sorenson Extension into the horse range	N	Thank you for your comment
DR-MTDK-BL-13-0384-1	Travel mgnt	GC 1001 (marked #1 on the attached map) is a 1/2 mile section of road that connects the east section of the Grove Creek County road, to a continuous section of Grove Creek County road slightly west, all a single piece of roadway travelling east/west off State Highway 72. This section is inaccurately shown in the detail, as having a length of 1.4 miles. The only thing different from the roadway east of this section, and the roadway west of this section, is that this 1/2 mile portion is on BLM. This road is the main traveled roadway from Highway 72 running westerly to a number of privately owned residences, and to the Grove Creek Ranch Headquarters. BLM should insure that this type of ROW access continues to be provided under any alternative. Next is a section of road approximately 5/8 mile long that is either described as the extreme west piece of the Grove Creek Road, or the extreme east end of GC 1047 Gold Creek. I have marked it as #2 on the attached map. Connecting to it on the east side is another 5/8 mile piece I have shown as #3 on the attached map. These two legs of a wye are the main connectors from State Highway 72, to the Meeteetse Trail, and provide access to a number of private residences, (including mine), as well as to dozens of private property owners of 20 and 40 acre pieces of property accessed off Meeteetse Trail. Road #2 is a more graveled piece of road that receives the biggest percentage of east/west travel since it is not as susceptible to ruts and water puddles when wet. Road #3 tends to be more dirt sections and quickly develops waterholes and tire trail ruts when wet and is therefore more avoided, depending on the time of year. Without these connectors from Grove Creek Road to the Meeteetse Trail, traffic to the numerous residences in the area would have to connect to State Highway 72 via the Robertson Draw and Chance Roads. This would add approximately 5.2 miles to east west traffic in the event of an emergency. Seven to ten minutes of additional response time can be critical in the event of a fire or medical emergency.	n	Thank you for your concerns and comments. In regards to the vehicle routes which you have identified, BLM staff have reviewed the route designations and determined that all (marked #1, #2, and #3 on your submittal map) are designated as "open" in the RMP and are not closed.
DR-MTDK-BL-13-0384-2	ACEC	Topic: Grove Creek ACEC Comments This is a large area totaling approximately 20 to 22 sections (12,800 to 14,080 total acres depending on Alternative), that is checker boarded with private land, State land, and BLM land. There are numerous privately owned homes in this area, with dozens more individual property owners of property that has been surveyed, plated, and sub divided into 20 acre and 40 acre parcels since the early 1970's. These factors do not lend this area to an ACEC designation. There is too much wild land urban interface. If there are in fact legitimate areas on the BLM owned portions that meet both the Relevance and Importance tests, then only those areas on the westernmost section of the Gold Creek Complex and the Ruby Creek Complex, in 160 acre	N	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the B&PPNM RMP/EIS The proposed Grove Creek ACEC varies in size by alternative from 8,251 acres (Alts B and D) to 9,445 acres (Alt C). The BLM can only designate BLM managed public land as an ACEC and the relevant and important values of the ACEC go beyond the physical archaeological sites on the ground, it is a

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		segments only, should be considered for ACEC designation, and not the entire 22 section area.		possible traditional cultural property to the Crow tribe. Please see Appendix E for the resource evaluation on this ACEC. Also please refer to FLPMA Sections 103, 201, and 202 for the direction which it provides regarding the high priority BLM is to give in the designation and management of ACECs.
DR-MTDK-BL-13-0384-3	Fire Ecology and Management	The fire management and suppression policy as shown in the proposed Grove Creek ACEC is in conflict with the intent of sage grouse habitat protection. Immediate suppression should be the policy in all fires involving sage grouse habitat, to not only protect the sage grouse habitat itself, but private property and human life that reside in the area as well, regardless of the origin of the fire. None the less, under any proposed alternative BLM should specify and clarify the criteria considered before a decision is made to manage fire in this area.	N	Thank you for expressing your concerns. Please see table 2-6.3 Grove Creek Please see Appendix E for the resource evaluation on this ACEC. Also please refer to FLPMA Sections 103, 201, and 202 for the direction which it provides regarding the high priority BLM is to give in the designation and management of ACECs. In response to your comment, the text in Alternative D for the Grove Creek ACEC of the Proposed RMP and Final EIS has been revised to state: Wildfire management (natural ignitions) for resource benefit. Full range of fire management activities would be used in ACEC in response to human-ignited fires. Use of heavy equipment and retardant would be avoided unless approved by authorized officer.
DR-MTDK-BL-13-0386-1	Livestock Grazing, veg-rangelands	the DRMP addresses conservation concerns to a degree, the document falls short of providing the depth of analysis and consideration of grazing alternatives warranted by a land use plan for all BLM-managed lands in south-central Montana. In spite of the evidence of widespread loss of plant productivity and ground cover, accelerated erosion and BLM's own documentation of rapid declines in species such as sage-grouse, BLM routinely chooses not to address livestock impacts in any scientific or sustainable fashion. In regards to livestock grazing, Western Watersheds Project urges the BLM to add the following to the Final EIS and RMP:(1) specific measurable terms and conditions for livestock grazing in riparian areas, uplands, and wildlife and fisheries habitat, including:(i) a minimum of 7" stubble height remaining on hydric soils riparian greenlines after livestock grazing(ii) a 10% maximum annual bank or wetland alteration from all sources for streams and wetland hydric and mesic soil areas of upland seeps, springs, wet meadows and aspen clones(iii) a maximum annual woody browse utilization by all browsing ungulates of 15% on cottonwood, aspen, woody shrub, and willows (iv) a maximum annual grazing utilization of perennial grass species on upland landscapes by all grazer of 35%(v) a minimum 9" residual perennial native grass cover for ground-nesting birds like sage-grouse and sharp-tailed grouse(2) additional needed alternatives(3) inclusion of directions for the permanent retirement of voluntarily waived grazing permits in	n	Thank you for your comment. The specific measurable term and conditions you outline in comment bullet 1 are not within the scope of an RMP level analysis, and blanket terms and condition which would be applied through an RMP are not always warranted. This is supported by the data presented on page 2-13 and in Appendix S, in which 83.5% of the allotments (approximately 309,700 acres) are meeting all standards for rangeland health, an additional 9.1% allotments (approximately 41,000 acres) are making significant progress toward meeting standards, and eleven allotments (3,835 acres) are not meeting standard for rangeland health. The use of management tools such as the guidelines outlined in appendix I, as well as and if appropriate measurable use limits are analyzed, and implemented through site specific NEPA analysis during permit/lease issuance. Comment Bullet 2: An adequate range of alternatives was analyzed. (See section 2.2.) Each alternative provides a different emphasis for managing public lands and resources within the planning area, and each alternative represents a complete and reasonable RMP that (1) meets the purpose and need described in Chapter 1; (2) responds to environmental, operational, and economic concerns raised by the public, agencies, businesses, and other special interest

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		all alternatives and the selected alternative of the Final EIS		<p>groups during the scoping process; and (3) addresses potential environmental issues identified during review of the proposed management actions.</p> <p>Comment Bullet 3: The permanent retirement of all voluntarily waived grazing permits is not warranted. As previously stated 83.5% of the allotments (approximately 309,700 acres) are meeting all standards for rangeland health and an additional 9.1% allotments (approximately 41,000 acres) are making significant progress toward meeting standards. The rangelands of the Great Plains have a long evolutionary history of grazing and grazing is accepted by grassland ecologists as a keystone process of the grassland ecosystem (Fuhlendorf and Engle 2001, Milchunas et al. 1988, Knapp et al. 1999). On a site specific basis, by policy, the BLM would examine and document whether continued livestock use of all or a part of the forage allocation proposed for relinquishment meets rangeland health standards, and if that continued use would be compatible with achieving land use plan management goals and objectives.</p>
DR-MTDK-BL-13-0386-10	Livestock Grazing	Any analysis of grazing is incomplete without a discussion of the effect the practice has had on predators. The most vehement opposition to wolves, bears, and other predators comes from the livestock industry, and is one of the main reasons some of the species are now listed. Predators perform important top-down ecological functions, yet they are consistently eradicated and heavily managed in order to protect livestock on public land, costing taxpayers millions of dollars. The DEIS fails to include an analysis of the impacts from livestock grazing on predators in the planning area, and such a discussion must be included in the FEIS	n	<p>Impacts to predators as the result of livestock grazing are not within the scope of the RMP. Montana Department of Fish, Wildlife, and Parks manage the wildlife species, including harvest laws and regulations. This includes: Game species, such as black bear, wolf, and mountain lion, furbearers such as bobcat, and non-game species such as fox and coyote. Additionally, the US Fish and Wildlife Service manage threatened and endangered species such as the lynx and grizzly bear. In areas where these species occur, Standard 5 (Habitat) found in appendix I states "The environment contains all of the necessary components to support viable populations of a sensitive/threatened and endangered species in a given area relative to site potential." Therefore if livestock grazing is impacting habitat or specific populations in a given area, site specific terms and conditions would be analyzed through the NEPA process, and applied as deemed necessary.</p> <p>Additionally, BLM has a Memorandum of Understanding (MOU) with USDA Wildlife Services for predator control on public land. MOU mandates the preparation of NEPA analysis, and an annual predator control plan and report.</p>
DR-MTDK-BL-13-0386-11	Wildlife	The Final EIS should discuss in detail the vast array of livestock diseases that can significantly harm if not kill native wildlife. Bighorn sheep in particular are extremely susceptible to livestock diseases carried by domestic sheep and goats, which are often asymptomatic to these same diseases." Pasteurella pneumonia and lung worm in particular are spread by domestic sheep. Yet, the RMP proposed to continue domestic sheep grazing in known bighorn sheep ranges without disclosing the expected impacts	n	<p>Thank you for the comment. The disease transmission risk has been recognized in several locations in the DRMP.</p> <p>Refer to Sections 2-6.1, page 2-72 and 73, and 2-6.2, page 2-120, where Alternative D states, "Domestic sheep/goat permits – No new grazing permits authorizing sheep or goat allotments would be allowed in bighorn sheep range (Map 17).</p> <p>Sheep and goat allotments in areas with risk of contact with bighorn sheep and domestic sheep and/or goats in the planning area would be reviewed and</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
				<p>managed, or reclassified if necessary, to achieve effective separation (both temporal and/ or spatial) between domestic sheep and/ or goats and bighorn sheep.</p> <p>Domestic sheep and goats used for weed control would only be authorized where mechanisms are in place to achieve effective separation from wild sheep.</p> <p>(Table 2-6.1, page 2-63)</p> <p>Management actions that preclude grazing in certain areas of the planning area are in place because livestock grazing has been deemed inconsistent with other activities, uses, or needs (i.e. wild sheep range, concentrated recreation areas, etc.). (Table 2-6.2, page 2-116)</p>
DR-MTDK-BL-13-0386-12	Livestock Grazing, veg-rangelands	<p>Given these findings, the BLM should analyze the impacts of long-term active management and its impacts on sagebrush communities and obligates compared to the impacts of removing livestock and allowing these communities to recover naturally. Additionally, since the continued "management" of sagebrush has led to many of the situations scientists now agree are threatening these ecosystems, the removal of livestock from sagebrush communities should be a seriously considered alternative in the RMP</p>	n	<p>Please refer to section 2.4, "Alternatives Considered but Not Analyzed in Detail". This topic was discussed in detail in Section 2.4.1 "Eliminate Livestock from BLM Public Lands", on page 2-12 through 2-15.</p> <p>Livestock grazing has occurred on public lands within the field office since settlement, representing "long-term." In the face of "long term" grazing, 343 allotments of the 370 total allotments are meeting standards for rangeland health, or are making significant progress towards meeting standards, representing 350,811 acres (table 3-16 Pg. 3-50) or nearly 81% of the acres within the field office.</p> <p>Standards for Rangeland Health (appendix I) outline the ecological processes which must be intact and functioning, including production, diversity, and residual cover. The standards are to be used in conjunction with Ecological Site Descriptions (Pg. 3-48) which recommend management actions (including livestock grazing) for specific communities on a site specific basis.</p>
DR-MTDK-BL-13-0386-13	Wildlife	<p>The 2012 Montana Fish, Wildlife, and Parks ("MTFWP") counts for the eastern Montana Sagegrouse Management Zone are only 64.9% of the long term average.⁶⁸ Across Montana, sagegrouse numbers have declined by more than half since 1980.⁶⁹ Furthermore, hunter harvest estimates have declined even further, dropping from 40,000 birds in 1984 to less than 5,000 in 2011.⁷⁰ This represents an 87.5% decline in hunter harvest across the State. Please review and share this important sage-grouse data in the final EIS. If you have more site specific information relevant to sage-grouse trends and habitat conditions within the Hi-Line RMA, please reveal it in the final EIS as well</p>	n	<p>Thank you for your comment. This comment refers to the Hiline DRMP/EIS</p>
DR-MTDK-BL-13-0386-14	Livestock grazing, social/econ	<p>The economic and social value of public lands livestock grazing receives disproportionate weight in the DEIS. The importance of public lands grazing to the economy of the region is grossly overestimated. The calculation of the social and economic values of the draft plan should demonstrate a clear understanding and consideration of the conflicts between continued grazing and other uses of</p>	N	<p>Costs associated with administering the range program are included in the Field office's annual salary and non-salary expenditures analyzed in Chapter 4. These expenditures are financed with congressionally appropriated funds.</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		the public lands. The BLM must provide a more thorough analysis of the social and economic values of different livestock grazing levels. This analysis must consider the administrative costs of a grazing policy, economic benefits from recreation where grazing is reduced or eliminated, and the cost of negative environmental consequences of livestock grazing in the area		
DR-MTDK-BL-13-0386-15	Livestock grazing, social/econ	The administrative costs of public lands grazing are often underestimated, and not even considered in the DEIS. Considering only direct costs, BLM range management costs in 2011 totaled \$77.3 million, while income from grazing fees was only \$4.5 million, leaving a net deficit to the U.S. Treasury was \$72.8 million. ⁷⁹ This loss on federal grazing programs fails to consider indirect costs, such as administration of the range program. Estimates of those indirect costs rise well over \$100 million. ⁸⁰ The economic calculation in the DEIS ignores potential administrative cost savings from reduced grazing. Decreased grazing would save the BLM costs associated with environmental analysis, litigation, grazing permit administration, predator control, weed spraying, and costly efforts to preserve species harmed by grazing	n	Costs associated with administering the range program are included in the Field office's annual salary and non-salary expenditures analyzed in Chapter 4. These expenditures are financed with congressionally appropriated funds.
DR-MTDK-BL-13-0386-16	Social/econ	Agricultural statistics often overestimate the value of public lands ranching to local economies. The number of permittees and full-time ranchers is often extremely inflated. In fact, "the elimination of all public lands livestock grazing would result in a loss of 18,300 jobs in agriculture and related industries across the entire West, or approximately 0.1 percent of the West's total employment." ⁸¹ For further information on the significance of federal public lands grazing to employment and economies in the West generally, see Thomas Power's article, Taking Stock of Public Lands Grazing: An Economic Analysis. ⁸² 82 Thomas Power, Taking Stock of Public Lands Grazing: An Economic Analysis, available at http://www.publiclandsranching.org/htmlres/wr_taking_stock.htm .	n	The livestock grazing analysis uses the best available information from BLM grazing permits and a peer-reviewed method of estimating employment and income associated with livestock grazing, as described on pg. 4-595 of the DEIS.
DR-MTDK-BL-13-0386-17	Social/econ	Often, public lands recreation provides far more economic benefit to local communities than livestock grazing. Improved environmental conditions that would result from decreased grazing would likely create more jobs and economic development related to outdoor recreation such as hiking, camping, fishing, hunting, and the associated benefits to restaurants, hotels, convenience stores, and other in the area. A 2011 Department of Interior study stated that "[r]ecreation visits to Interior-managed lands in the contiguous United States, Hawaii, and Alaska in 2011 supported over 403,000 jobs and about \$48.7 billion in economic contributions to the communities and regions surrounding Interior-managed land." ⁸³ The DEIS ignores the economic significance of recreation, an economic benefit that would increase with improved land conditions from decreased grazing	n	The livestock grazing analysis uses the best available information from BLM grazing permits and a peer-reviewed method of estimating employment and income associated with livestock grazing, as described on pg. 4-595 of the DEIS.
DR-MTDK-BL-13-0386-	Livestock grazing	The DRMP fails to address the economic costs of environmental degradation. It fails to calculate the value lost from negative environmental impacts to water quality and quantity, aquatic species habitat, riparian and upland wildlife habitat	N	Thank you for your comment. Please see Chapter 3, Table 3-17 for a summary of allotments/acreage meeting Standards of Rangeland Health.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
18		quality and quantity, and native vegetation. Unsustainable grazing practices proposed in the DEIS could lead to species loss throughout the area. The DEIS also fails to address the potential for further exotic species and weed expansions, the costs associated with weeds and flammable invasive species, and the resulting potential for species loss. The viability of wildlife and rare plant populations and the cost to protect and preserve them in the face of chronic grazing degradation demands BLM's attention. If the BLM is to rise to its calling as land administrator for the public, the beauty and intrinsic value of the land, as described by Aldo Leopold, must also be addressed		
DR-MTDK-BL-13-0386-19	Livestock grazing	The DRMP fails to provide in-depth analysis of various alternatives, including a no grazing alternative, and two or more significantly reduced livestock use alternatives. The draft plan alternatives would permit grazing of an average of 42,931 AUMs on 386,000-387,000 acres. ⁸⁸ The impact of oil and gas development on these species is analyzed in more detail, but livestock grazing impacts are not sufficiently analyzed. Western Watersheds Project urges the BLM to add specific measurable objectives for livestock grazing specific to riparian areas, uplands, and impacts on sensitive species habitat in order to comply with FLPMA, beginning with the five terms and conditions mentioned above	n	A no grazing alternative was considered but not analyzed in detail (section 2.4.1 Pg. 2-12 and 2-15) for various reasons, including the data presented in the comment above. Additionally, reduced grazing was not considered due to the fact that across the board reductions are not warranted because only 11 allotments (3,835 acres) are not meeting standards. A "No Grazing" alternative is considered, and analyzed in detail during site specific NEPA analysis prior to permit/lease issuance. The proposed alternatives and existing rangeland health standards and guidelines for the Billings FO provide the necessary tools to mitigate and address resource conflicts and competing uses within the planning area. The draft plan and EIS provides sufficient detail to foster informed decision making at the broad, programmatic level of this plan. Rangeland Health Standards (Appendix I) specifically Standard 5 (habitat) ensures that livestock management will comply with FLPMA. Standard five states "The environment contains all the necessary components to support viable populations of a sensitive/threatened and endangered species in a given area relative to site potential." Additionally, the incorporation of measurable objectives for livestock grazing is outside of the scope of an RMP level analysis, and should be conducted at the site specific NEPA analysis stage based on site potential, available resources, and seasonal use patterns. It is at the site-specific level, when BLM is making a critical decision to act, that the agency is obligated fully to evaluate the impacts of a proposed action.
DR-MTDK-BL-13-0386-2	Livestock grazing	the reason for addressing livestock grazing in the RMP is to improve the range condition of the allotments within the project area and to maintain and improve wildlife habitat. This direction, based on laws and regulations, should be explicitly stated in the "Purpose and Need for the Plan" in the FEIS. Furthermore, the selection of any alternative in the DEIS that does not provide direction for meeting those goals violates the intent of the laws and regulations that govern public land management	n	Thank you for your comment
DR-MTDK-BL-13-0386-	Livestock grazing	The BLM should consider a no grazing alternative. The DRMP states that "[b]ecause the BLM has considerable discretion through its grazing regulations to determine and adjust stocking levels, seasons-of-use, and grazing	n	There is no documented need to entirely eliminate livestock grazing within the planning area. A no grazing alternative was considered but not analyzed in detail (in the DRMP: section 2.4.1 Pg. 2-12 and 2-15) based upon the

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
20		management activities, and to allocate forage to uses of the public lands in an RMP, the analysis of an alternative to entirely eliminate grazing is not needed."89 Considering the scientific evidence demonstrating that the elimination of grazing is the only way to protect and restore many areas, the BLM should provide analysis of that important option		proportion of public land and number of grazing allotments meeting standards, and making significant progress towards meeting standards. Additionally, reduced grazing was not considered due to the fact that across the board reductions are not warranted because only 11 allotments (3,835 acres) are not meeting standards. A "No Grazing" alternative is considered, and analyzed in detail during site specific NEPA analysis prior to permit/lease issuance. The proposed alternatives and existing rangeland health standards and guidelines for the Billings FO provide the necessary tools to mitigate and address resource conflicts and competing uses within the planning area. The draft plan and EIS provides sufficient detail to foster informed decision making at the broad, programmatic level of this plan. Please see Section 2.4.1 for rationale for Alternatives Considered but not Analyzed in Detail - Eliminate Livestock Grazing from BLM Public Lands.
DR-MTDK-BL-13-0386-21	Livestock grazing	In addition to the no grazing alternative, the BLM should analyze an alternative that reduces permitted grazing by 50%. The current alternatives offer only minimal variation in number of acres and permitted AUMs, and only a reduction of 50% or more would offer sufficient change to address the environmental impacts of livestock grazing. The EIS and RMP must also address the fact that livestock sizes, and thus forage consumption, have increased dramatically since the AUM was defined. Failure to address this critical issue will lead to legal vulnerability under NEPA, APA and the False Claims Act	n	<p>Thank you for the comment, As stated above across the board reductions are not warranted based on current land health standard statistics. Reductions are considered at the site specific level rather than at an RMP level to address site specific issues.</p> <p>For purposes of pragmatic and orderly range administration, the BLM's definition of an Animal Unit Month (AUM) for fee purposes at 43 CFR 4130.8-1 (c) encompasses a variety of classes of animals that vary in weight and can differ significantly from a 1,000-pound animal. The forage consumed by a steer or heifer weighing 600 pounds grazing for one month is counted as an AUM, as is the forage consumed by a 1000-pound cow with a calf. The BLM's definition of an AUM at 43 CFR 4100.0-5 does not identify the quantity of forage that constitutes an AUM nor does the regulation at 43 CFR 4130.8-1 providing for payment of grazing fees.</p> <p>The amount of permitted use is a mandatory term in grazing permits and leases. Permitted use will be modified when the authorized officer determines that such an adjustment is needed to manage, maintain, or improve rangeland productivity; to assist in restoring ecosystems to properly functioning condition; or to otherwise meet land health standards or land use plan objectives. (See management actions common to all alternatives on page 2-116.) The BLM manages grazing impacts at the allotment level using the data gathered through monitoring, field observations, ecological site inventories, and land health assessments. Even though data for livestock weights or the amount of forage consumed per animal are not specifically gathered or identified, monitoring resource condition at the allotment level and, where necessary,</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
				making changes in grazing management, would account for differences in livestock weights and forage consumption.
DR-MTDK-BL-13-0386-22	Livestock grazing	As part of the Final EIS's explanation of the existing management situation, the Final EIS and RMP should provide an Allotment Management Summary detailing the conditions of each allotment within the planning area. This summary should include not only the number of AUMs permitted on each allotment, but also the actual use or "average use." Without data about actual use, the environmental assessment of livestock grazing impacts may be significantly distorted, especially on those allotments where less than the permitted AUMs are actually grazing on the land. Additionally, this section of the document should include the suspended nonuse AUMs, other forage allocations, specific resource concerns, and management objectives. The attached two page excerpt from the July 1999 Owyhee RMP and FEIS offers a great example of an Allotment Management Summary	n	A summary of the allotment information is available in appendix S. Of the 370 allotments administered by the Billings Field Office 236 allotments (64%) are management category C or custodial management. On these allotments there is typically no suspended use and average or actual use is not collected on these allotments. There are 100 allotments (27%) categorized as M or maintain management. Occasionally these allotments have suspended AUMs, and only occasionally is the actual/average use tracked on these allotments. The remaining 34 allotment (9%) are category I or Improve allotments. On these allotments suspended AUMs are typically a result of past management actions, however documentation of this has been poor. Actual use is commonly tracked on these allotments. Due to the fact that only eleven allotments (3,835 acres) are failing rangeland health standards, and actual use data is collected on only a few allotments, the BLM did not include this data. While these data were not included in the DRMP, these data are reviewed and taken into consideration during the permitting process.
DR-MTDK-BL-13-0386-3	Livestock grazing	The correction of resource degradation caused by domestic livestock and the prevention of future degradation should be driving forces behind the RMP and should be reflected throughout the NEPA document and in any future agency decisions regarding domestic livestock grazing in the project area. Each alternative falls short of restoring degraded conditions and meeting the mandates described above. Specific livestock grazing levels that will be used to meet standards are lacking in all alternatives in the DEIS and must be included in the FEIS	n	The specific livestock levels used to meet standards are given in the alternatives-page 2-118. The degraded conditions suggested by the comment are not substantiated by data. Land health standards are being met, or significant progress is being made, on 97% of the acreage being administered for livestock grazing. (See table 3-16 on page 3-50.) Less than 2% of the acres are not meeting standards. As stated in the purpose of the RMP (pg. 1-4) "The purpose or goal of the land use plan is to provide a comprehensive framework for the BLM's managers in accordance with FLPMA, and the principles of multiple use and sustained yield." Based on the current statistics of land health within the field office (pg. 2-13) with only 11 allotments (3,835 acres) not meeting standards, specific levels of grazing throughout the field office are not needed. These standards are better applied through site specific NEPA analysis, and applied through grazing permit terms and conditions.
DR-MTDK-BL-13-0386-4	Livestock grazing	The DRMP fails to provide clear, quantitative terms and conditions to guarantee compliance with those guidelines. The DRMP explains that permit level range management will be consistent with the Standards for Rangeland Health and Guidelines for Livestock Grazing Management for Montana, North Dakota, and South Dakota,4 essentially leaving all decisions regarding the number of permitted on the landscape for the individual permitting process. While such guidelines articulate important goals, those goals will not be achieved without requiring that land managers meet quantitatively measurable terms and conditions. For example, Guideline #1 provides that "[g]razing will be managed in a manner that will maintain the proper balance between soils, water, and vegetation over time."5 In order to address effectively environmental impacts of	n	By regulation, grazing use on public lands must meet, or make progress toward meeting, rangeland health standards. Permitted use, terms and conditions, and range improvements may all be modified when site specific conditions warrant such changes. Current rangeland health standard statistics (pg. 2-13) show that authorized grazing use within the Billings FO is achieving consistency with the Standards for Rangeland Health and Guidelines for Livestock Grazing Management for Montana, North Dakota, and South Dakota. Only 11 allotments (3,835 acres) are failing to meet standards for rangeland health, while 309 allotments are meeting all standards and an additional 34 allotment are making significant progress toward meeting land health standards under the current 1984 Land Use Plan. The record (see table 3-16) shows that the BLM has

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		grazing, the DRMP must provide clear, quantitative terms and conditions to guarantee compliance with those guidelines		addressed the environmental impacts of grazing on the landscape. Where grazing impacts of grazing are causing degradation of public land, or conflicting with other multiple use objectives or goals, quantitatively measurable terms and conditions, as well as other terms and conditions are placed on the grazing authorization.
DR-MTDK-BL-13-0386-5	Livestock grazing	The Billings Field Office ("BiFO") has failed to take the required "hard look" at the impacts of domestic livestock grazing. The DEIS fails to scientifically and accurately determine those lands which are capable and suitable for livestock grazing. The BLM has further failed to accurately and quantitatively determine how much forage (i.e. forage capacity) is currently available. On top of this, the DRMP fails to properly allocate that forage to watershed and stream protection, wildlife habitat and food, then to livestock if available	n	The RMP identified lands (see pages 2-117 to 2-118 of the DRMP) available or not available for livestock grazing considering factors such as other uses for the land; terrain characteristics; soil, vegetation, and watershed characteristics; the presence of undesirable vegetation, including significant invasive weed infestations; and the presence of other resources that may require special management or protection including special status species, special recreation management areas (SRMAs), or ACECs. The forage capacity available for livestock grazing under the various alternatives is shown on page 2-118. The allocation of forage is proper because 97% of the acres being grazed are either meeting rangeland health standards or making significant progress toward meeting land health standards. (See appendix S.) Land health standard assessments consider the health of watersheds including riparian areas and uplands, as well as habitat for wildlife and plant populations. The RMP took a "hard look" at the impacts of livestock grazing. The record shows that BLM adequately considered livestock grazing impacts in multiple sections of the RMP (See chapter 4.), including grazing impacts on greater sage-grouse habitat, riparian vegetation, and fish and wildlife, among others.
DR-MTDK-BL-13-0386-6	Livestock grazing	the DRMP fails to seriously consider the impacts of livestock grazing on the planning area, and instead promotes the idea of grazing as a method to improve land management. Citing the Grassland National Park Management Plan, the DRMP states, "[t]here is also agreement among many scientists and natural resource managers that some level of grazing disturbance is necessary to assure the ecological integrity of the mixed-grass prairie ecosystem." (Grassland National Park Management Plan 2001). ¹³ The Canadian Grassland National Park document refers to historic bison grazing, when grazing animals moved across the landscape. These scientific conclusions do not apply to cattle, especially fenced cattle. Instead of relying on inapplicable historical characterizations of bison, the Final RMP and EIS should consider current peer reviewed science describing the environmental impacts of livestock grazing	n	Grazing is a well-accepted land management tool. On page 2-13 where the Grassland National Park Management Plan was cited, the context was to show that grazing disturbance is necessary to assure ecological integrity of the mixed grass prairie. This context does not elaborate as to the kind or class of livestock, but rather the act of grazing is needed. Further research (cited on pg. 2-13) supports the claim that many of the Billings RMP planning area rangelands evolved with grazing and grazing is a keystone process for these systems.
DR-MTDK-BL-13-0386-7	Livestock grazing	The HiLine DRMP, also released for comment this month, recognizes the potential for livestock to impact naturalness, stating: Livestock grazing has the potential to impact naturalness, the undeveloped character, and to create conflict with recreation users. Manipulation of vegetation, alteration of soils, and the presence of fecal matter would create unnatural conditions and would impact opportunities for solitude, particularly in areas where livestock congregate.	n	Sections 4.2.14.5.3, 4.2.14.6.3, and 4.2.14.7.3 specifically discuss the impacts of livestock grazing and range improvements have on the naturalness of lands with wilderness characteristics. Appendix K discusses the lands with wilderness characteristics evaluation process for specific tracts. Livestock grazing and range improvements and their

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		Range facilities, such as fences, water troughs, and tanks have the potential to degrade wilderness characteristics by creating new developments, disturbing visual resources, and influencing wildlife migration, reproduction, and mortality (e.g., sage-grouse/fence collisions). ²⁰ Livestock grazing in the BiFO planning area presents the same potential impacts [to naturalness as described in the HiLine DRMP], but the DRMP fails to acknowledge or address those impacts		effects on current conditions were evaluated as part of this process. Sections 4.3.5.4.13, 4.3.5.5.13, 4.3.5.6.13 and 4.3.5.7.14 specifically discuss impacts livestock grazing and range improvements have on recreational users.
DR-MTDK-BL-13-0386-8	Livestock grazing	The Billings DRMP acknowledges very few negative impacts of livestock grazing. In contrast, the HiLine DRMP acknowledges some of the many know negative environmental impacts of livestock grazing in riparian areas: Overgrazing can eliminate riparian vegetative cover, resulting in increased soil erosion and sedimentation. Increases in nonpoint source pollution, and loss of channel stability, can deteriorate water quality and diminish the ability of ecosystems to maintain healthy aquatic communities across localized and watershed scales. . Strewn conditions and degraded water resources characterized by livestock overgrazing often include unstable and eroded banks, sedimentation, buried or embedded rock substrates, loss of riparian vegetative cover and associated organic matter inputs, increased width-to-depth ratio, reduced current in shallow water, nutrient enrichment, increased algae growth, reduced dissolved oxygen, higher temperatures, and reduced wildlife habitat structure.	n	In response to your comment, the text in section 4.2.6.3 (riparian and wetlands) of the Proposed RMP and Final EIS has been expanded to include the discussion of the negative impacts associated with livestock grazing in riparian areas.
DR-MTDK-BL-13-0386-9	Wildlife	Grazing also exerts great impact on animal populations, usually due to indirect effects on habitat structure and prey availability. ³⁶ Deleterious effects of grazing have been observed in all vertebrate classes. Response of native wildlife to grazing varies by habitat. Bock et al. ³⁷ reviewed the effect of grazing on Neotropical migratory land birds in three ecosystem types, and found an increasingly negative effect on abundances of bird species in grassland, riparian woodland, and Intermountain shrubsteppe (almost equal numbers of species with positive and negative responses to grazing in grassland; six times as many with negative as positive responses in shrubsteppe), but impacts to these species are lacking in the DEIS	n	Under Alternatives B & D Management Categories would be changed to "I" within sage steppe habitats in PHMA for sage grouse. These "I" category allotments would have a higher priority management level. Other sagebrush obligate species would also benefit from higher priority management of the sage steppe habitat. Also, all grazing permit renewals would have site specific NEPA analysis addressing migratory birds and other wildlife. If livestock grazing is identified as a causal factor, and if standards for healthy rangelands are not met, changes in grazing management have to be implemented within 1 year.
DR-MTDK-BL-13-0390-1	Wildlife	ABC is in the process of finalizing Conservation Plan for the Long-billed Curlew that includes Best Management Practices drawn from studies throughout the species' range, many of them compiled by Cannings (1999), Dechant et al (1999), Fellows and Jones (2009). We urge you to consider incorporating the following BMPs into Appendix B, Wildlife Habitat and Special Status Species, pages B-24 through B- 26. We realize further that "BMPs would be implemented at the discretion of the Billings Field Office on a project-specific basis, depending on the specific characteristics of the project area and the types of disturbance being proposed", which is wording common to all Alternatives, page 2-8. Section IV -" Best Management Practices (from: Conservation Strategies for the Long-billed Curlew: Focal Areas, Desired Habitat Conditions and Best Management	n	Thank you for the comment. Long-billed curlews are considered Special Status Species through BLM I.M. MT-2009-039. BMPs would be considered in the project-specific NEPA analyses. A reference to the "Conservation Strategies for the Long-billed Curlew", American Bird Conservancy, Sept. 2013, will be included in the BMP Appendix, Section B.4 , "Wildlife" and references.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		<p>Practices (FINAL WORKING DRAFT). American Bird Conservancy, The Plains, VA, and Kalispell, MT.) The following set of recommended management actions and guidelines should be implemented wherever practicable within the breeding range of the Long-billed Curlew in North America. They are adapted primarily from Dechant et al (1999) and Cannings (1999). In every case, these guidelines will be most effective if implemented on landscapes already known to be inhabited by breeding curlews; ideally implementation should be accompanied by local surveys to verify important nesting or brood rearing areas. The timing of breeding, appropriate stocking rates, seed mixes and opportunities will vary regionally, as well as by site. We present these as overall guidance to land managers across the range of the species, but urge local partner cooperation and consultation during their implementation. This will help ensure that local expertise and other site management objectives are taken into account. Manage Grazing Appropriately ? Remove tall, dense residual vegetation before the pre-laying period (graze in fall/winter). ? Adjust timing and intensity of grazing to leave grass cover 10-30 cm tall by 15 April. ? Retain 5% of grasses and forbs in taller condition (30-40 cm) for broods. ? Avoid grazing during the incubation and nestling period (15 April - 15 July), to avoid potential for trampling. ? Do not drag hayfields to break up cowpies. We recommend using existing or future information regarding the known distribution of Long-billed Curlews to implement these grazing BMPs on those acres where grazing is allowed, under the selected alternative. Halt Habitat Conversion ? Prevent conversion of grassland or shrubsteppe, particularly within ¼ mile of wetlands. ? Maintain or manage for grassland block sizes of >120 acres. ? Manage the forest fringe to minimize/reverse forest encroachment using slashing or other suitable method. We recommend using existing or future information regarding the known distribution of Long-billed Curlews to implement these BMPs under any selected alternative, particularly on any ac available for oil and gas leasing, or Renewables ROW designations. Known Long-billed Curlew breeding areas should be excluded from sites considered for wind energy developments. Emphasize Native Grasses and Forbs ? Burn areas only where and when fire intensity will reduce shrub coverage and increase habitat openness without reducing the diversity of native grass and forbs. ? Avoid seeding with non-natives (e.g. crested wheatgrass). ? Use locally-appropriate native bunchgrass/forb seed mixes for restoration and revegetation efforts. ? Where necessary, manage taller non-native grass cover with grazing, mowing or fire to maintain low profile vegetation prior to the nesting season. We recommend using existing or future information regarding the known distribution of Long-billed Curlews to implement these BMPs under any selected alternative. Avoid Disturbance During Sensitive Periods ? Protect breeding habitat of curlews from detrimental human activities, such as vehicular use, researcher disturbance, and</p>		

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		shooting. ? Do not construct roads in occupied curlew habitat unless there is no other practicable option. Limit road use during the breeding season (March 15-July 15). We recommend using existing or future information regarding the known distribution of Long-billed Curlews to implement these BMPs under any selected alternative, particularly on acres available for oil and gas leasing, or with Renewables ROW designations. Designation of areas open or closed to OHV use should consider Long-billed Curlew breeding habitat and timing. Adjust Certain Agricultural Practices ? Reduce pesticide use on grasslands, especially near water, to maintain both terrestrial and aquatic invertebrates as a food sources. ? Avoid widespread pesticide applications aimed at controlling grasshoppers. ? Reduce herbicide use to maintain nesting, loafing, and brood-rearing cover. ? Whenever possible and practicable, favor flood-irrigation of hay meadows over sprinkler systems. References Cited: Brown, S., C. Hickey, B. Harrington, and R. Gill, eds. 2001. The U.S. Shorebird Conservation Plan, 2nd ed. Manomet Center for Conservation Sciences, Manomet, MA. Cannings, R.J. 1999. Status of the Long-billed Curlew in British Columbia. Wildlife Working Report No. WR-96, British Columbia Ministry of Environment, Lands and Parks, Victoria. 14p. Dechant, J. A., M. L. Sondreal, D. H. Johnson, L. D. Igl, C. M. Goldade, P. A. Rabie, and B. R. Euliss. 1999 (revised 2002). Effects of management practices on grassland birds: Long-billed Curlew. Northern Prairie Wildlife Research Center, Jamestown, ND. 19 pages. Fellows, S.D., and S. L. Jones. 2009. Status assessment and conservation action plan for the Long-billed Curlew (<i>Numenius americanus</i>). U.S. Dept. of Interior, Fish and Wildlife Service, Biol. Tech. Publ, FWS/BTP-R6012-2009, Washington, D.C. 98p.		
DR-MTDK-BL-13-0392-1	Wildlife	2-69Wildlife Habitat Unoccupied raptor nests would be protected from removal or destruction for 7 years. MJRWS may affect a raptor nest. How will BLM know whether a raptor nest has been unoccupied for 7 years? It seems that any nest will need to be observed for 7 years once discovered before a tree could be cut or a power pole replaced. What does the science say about the longevity of a nest that is not maintained and what is the scientific basis for the 7-year timeframe?	n	Inventories and signs of nest activity would be conducted. Seven years was selected based on the period a known preferred prey species fluctuates from population highs to lows (C. White BYU 1998 personal communication in Romin and Muck 2002). -from MSO consistency guidance
DR-MTDK-BL-13-0392-2	Wildlife	2-72Big Game Winter Range Alternatives B and D - Over the snow vehicles would be prohibited in big game crucial winter range. MJRWS may require maintenance in the winter when access would include over snow vehicles. There is no justification for eliminating all over the snow use.	n	BLM-authorized Administrative access would be maintained. Refer to Appendix O, page O-2, 5th bullet down.
DR-MTDK-BL-13-0395-1	Air	2) In the Executive Summary, ES 1.6.1.12.1 Mineral Resources: It is stated in the last paragraph that, "The BLM anticipates only limited development for locatable minerals, fluid minerals, coal and mineral materials during the life of the plan and, therefore, effects to the development of these resources from the alternatives are expected to be minimal." Minimal impact is a fairly bold prediction when watching the oil development work done in the area during the	n	Thank you for your comment. GHG emission emissions from BLM-authorized activities are included in Chapter 4, Climate Change, alternative-specific emission inventories and Appendix Y.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		past two years and the future work scheduled that will be using applications of new technology. Although certainly we are not as large an area, that could have been said about the Bakken a few years ago. We are not sure that is an accurate assumption.		
DR-MTDK-BL-13-0395-2	NEPA	3) Page 1-21, Section 1.5.1 County Plans, the Executive Summary does not include the Musselshell County Growth Policy adopted in 2003 and revised in 2011. It also does not acknowledge the six county Comprehensive Economic Development Strategy (CEDS), which includes three of the counties in the RMP planning area. This plan was written in 2007, revised in 2012, signed by all six central Montana counties and over a dozen incorporated towns. It was officially accepted by US Economic Development Administration and signed off on by the Governor of Montana. Both plans speak to area development preferences and projects.	N	Thank you for your comment. Please see Chapter 4 for the environmental consequences and Section 1.5 and Chapter 5 for discussions of inconsistencies between the Proposed RMP and county or local plans.
DR-MTDK-BL-13-0395-3	Water	4) Where did the information about 100 year floodplains come from? Map 8 in Volume IV shows a general map of the northern portion of the Billings District indicating flood mapped areas. Map 8 does not match our FEMA floodplain maps for the area. In fact much of the area may not have been officially mapped for floodplain. The 100 year floodplain is also referred to in table 2-5 of Volume I. Map No. 8 even indicates a range of frequency of flood events? Because of the small scale of the map, it is relatively hard to read and interpret. How are the terms Frequent, Occasional and Rare defined? What are those determinations based on? Do those interpretations have any bearing on the boundary levels of Sage Grouse Habitat?	n	Map 8 in Volume 4 was created by a BLM hydrologist using soil types and geomorphic character through GIS applications/analysis. It does not represent 100 year floodplains per FEMA. It is more comprehensive.
DR-MTDK-BL-13-0395-4	Edits	5) Table 2-6.1 and multiple other places in the RMP there is reference to "desirable nonnative plant and animal species. We believe there should be a definition of this reference, perhaps listing what those possible species would be. This should not be subject to interpretation in potential, future legal proceedings.	n	Thank you for your comment. A definition for desirable nonnative has been included in the glossary.
DR-MTDK-BL-13-0395-5	Coal	Table 2-8, Summary of Comparison Impacts: Alternative D on page 196 speaks of the impacts of a few jobs and limited federal revenue due to the mining of 2.8 million tons of coal annually will likely continue. It seems that all revenues and jobs associated with area coal mining, because it likely occurs in addition to and partially because of the federal presence, should be included in this impacts analysis of this section, i.e. Signal Peak. It is significantly more that 2.8 million tons of coal annually and a "few jobs".	N	Thank you for your comment. The 2.8 million ton value is the estimated average federal coal that will be mined by Signal Peak Energy at the Bull Mountains Mine No. 1.
DR-MTDK-BL-13-0396-1	Air	1. In the Executive Summary, Air Quality Related Values should be briefly discussed along with air quality. 2. In Chapter 1 under the Consultation section, it should be mentioned that there was a technical workgroup formed to address air quality issues as discussed in the Memorandum of Understanding between USDA, USDI and USEPA regarding the Air Quality Analyses and Mitigation for Federal Oil and Gas Decisions through the NEPA Process (June 23, 2011) 3. Chapter 3 Affected Environment, Particulate Matter, (3.2.1.8) -- Add: Fine	Y	1. See the "Executive Summary" section reference to "air resources," which include AQRVs. 2. See Section 1.6.2. 3. See Section 3.2.1.8. 4. As agreed by the AQTW, VISCREEN modeling was not performed for the planning area. 5. As agreed by the AQTW, AQRV analysis for the planning area is

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		<p>particulate also contributes to reduced visibility in nationally important areas such as national parks "and wilderness areas." 4. VISCREEN is addressed in the Appendix, but is not described in Chapter 4. The "Far-field AQRV Impacts" section be renamed to "AQRV Impacts" and should include the commitment to perform near-field analysis. 5. In the discussion of all the Chapter 4 alternatives, it states that future PGM modeling will be used. The statements should reference both limited AQRV analysis that will occur now and the PGM modeling analysis that will occur in the future to evaluate potential air impacts. 6. The FWS does not necessarily support the statement "Potential total nitrogen and sulfur deposition would likely remain below the levels of concern (3.0 kg/ha/yr and 5.0 kg/ha/yr, respectively)". FWS needs to evaluate these level of concern numbers and potentially provide supportable deposition values. FLAG 2010 suggests that incremental emission increases from development should be evaluated using the DATs. 7. AQRV impacts are not assessed as a function of "new" versus "existing" air quality emission levels. Although referenced as a subjective analysis, FLAG guidance does not support such a determination. 8. Summary/averaging current visibility conditions at Class I areas is relevant to cumulative (regional haze rule) evaluation. Incremental analysis being conducted between draft and final EIS development will not consider this averaging. 9. The statements that the "Air Resource Management Plan and Adaptive Management Strategy" was "was prepared in collaboration" under the oil and gas MOU may not accurately reflect our understanding of what was discussed in the air quality technical workgroup. FWS was not fully aware of the intent to utilize an Adaptive Management Strategy and its associated methods in the future. The FWS Branch of Air Quality would like to request a meeting or conference call with BLM on a staff and management level to discuss this strategy and its associated agreements. 10. In the Glossary add the term "Air Quality Related Value", "Class I Areas," "Class II Areas" and "Sensitive Class II Areas." 11. In the Bibliography add the BLM, EPA, FS, FWS, and NPS Oil and Gas Air Quality MOU dated June 23, 2011.</p>		<p>deferred until PGM can be performed with appropriate data. 6. Until the FWS can provide data with specific levels of concern (LOC), the default LOC values in FLAG will be used. Future photochemical grid modeling will evaluate incremental and cumulative deposition impacts. 7. Cumulative impacts including new and existing emissions will be modeled using photochemical grid modeling to assess air quality and AQRV impacts, as described in Appendix B, Section 5.1. 8. As agreed by the AQTW, AQRV analysis for the planning area is deferred until PGM can be performed with appropriate data. No AQRV modeling was performed between the draft and final EIS. 9. The language in Section 1.1 of Appendix T has been revised. 10. These terms are included the Glossary. 11. The References section includes the June 23, 2011 MOU.</p>
DR-MTDK-BL-13-0398-1	Locatable Minerals	<p>Executive Summary. Section 1.6.1.12.1. and for all subsequent occurrences of these statements and conclusions in the RMP/EIS. We respectfully request that revisions to two paragraphs in this section be incorporated into the final RMP/EIS: Suggested revisions (in italics) for completeness and clarification: "With the exception of bentonite and chemical grade limestone, the development potential for other locatable minerals in the planning area is low. Large areas of commercially viable chemical grade limestone deposits in the planning area are located just northeast of Warren in southern Carbon County, occurring in the exposed upper Madison Limestone strata of the southwest flank of Big Pryor Mountain. Current and future bentonite and chemical grade limestone surface mining operations would not be affected under any of the alternatives because</p>	n	<p>Thank you for your comment. Text in Chapter 1 has been edited to address your concerns.</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		the mining claims are valid, existing rights and the areas recommended for withdrawal do not coincide with areas having development potential." "The BLM anticipates only limited development for locatable minerals (except for moderate development for bentonite and chemical grade limestone), fluid minerals, coal, and mineral materials during the life of the plan and, therefore, effects to the development of these resources from the alternatives are expected to be minimal to moderate." Rationale: Based on the 50-plus year history of high-calcium limestone production from the Warren (Bighorn) Quarry now operated by Montana Limestone Company (MLC) in Carbon County, we believe this section and the conclusion statement should be amended to point out the significant viable locatable chemical grade limestone deposits in the southwestern Warren- Pryor Mountains area.		
DR-MTDK-BL-13-0398-2	Locatable Minerals	4. RMP/EIS Chapter 3 - Affected Environment, Section 3.17.4.5 "Locatable Materials" We respectfully request that the following revisions be made to this section. Suggested revisions (in italics) for completeness and clarification: "There are currently two approved 3809 mine plans for bentonite. Development potential for additional bentonite, gypsum, uranium, and limestone exist in the decision area. Locatable minerals related mining activity consists of two active bentonite mines and one active chemical grade limestone quarry, located in Carbon County. Two mining companies have both patented and unpatented claims for bentonite located on the west and southwest flanks of the Pryor Mountains in southern Carbon County. One mining company has patented and unpatented claims for chemical grade limestone on the southwest flanks of the Pryor Mountains near Warren in Carbon County."	n	Thank you for your comment. Text in Chapter 3 has been edited to address your concerns.
DR-MTDK-BL-13-0398-3	Social/econ	Section 3.32.2.1 Demographic and Economic Characteristics and Trends On Table 3-71, please include chemical limestone production under the "Major Population Center(s) and BLM Land/Mineral Uses" Column for Carbon County.	n	Thank you for your comment. MLC's operations do benefit Carbon County's economy. However the table you reference has to do the amount of BLM federal minerals contributing to Carbon county's economy.
DR-MTDK-BL-13-0398-4	Locatable Minerals	Section 3.32.2.2 Mineral Development and Production "Federal mineral activities include oil and gas leasing and production, mineral materials (sand and gravel and decorative stone), and some unpatented bentonite claims. There may also be a federal coal lease sale in 2011. Mining of private minerals includes these same minerals as well as coal, sand and gravel, chemical limestone, and platinum group minerals."	n	Thank you for your comment. The text in chapter 3 has been updated.
DR-MTDK-BL-13-0403-1	NEPA	No Surface Occupancy (NSO). There is no public process spelled out that would allow the public to comment when exceptions are made to NSO stipulations. This needs to be corrected. If exceptions are made (waivers, exemptions and modifications) to NSO, the BLM needs to notify interested parties and allow for public comment, including an analysis under the National Environmental Policy Act. At a minimum, this public comment process and NEPA compliance should apply to the NSO provisions in sensitive areas for wildlife, including the Greater Sage-Grouse Protection Priority Area (PPA), Areas of Critical Environmental	n	Thank you for your comment. The public has the opportunity to provide comments on NEPA documents as part of the regular NEPA process. . The subject of this comment is beyond the scope of the Billings/Pompeys Pillar National Monument RMP/EIS and does not require further agency response.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		Concern (ACECs) and critical habitat for other BLM Sensitive Species.		
DR-MTDK-BL-13-0403-10	Riparian, Vegetation Invasive Species and Noxious Weeds	We ask that the BLM adopt Alternative B for its use of herbicides near wetlands and riparian areas. A 25 foot buffer (found in the other Alternatives), is not adequate; a 50 foot buffer is more appropriate.	n	Thank you for your comment. A 25 foot buffer has been determined safe for water quality conservation. Application conditions must be followed to ensure chemicals have adequate time to dry and attenuate, for example, a treatment may be delayed if the weather is rainy which could allow for chemical to be washed into the waterbody before drying/attenuation. Alternative B, found on page 2-64 analyzes land base (ATV, Truck mount spray equipment) application methods that would not be allowed within ¼ mile (1320 feet) of fish-bearing water bodies during periods when fish are in life stages most sensitive to the herbicide(s) used. Alternative D (the preferred alternative) adheres to BLM policy and all BLM approved pesticide label specifications and restrictions, also part of bureau policy for the application of any herbicide. Additionally, Pesticide Use Proposals (PUPs) are prepared on a site specific basis at the project implementation level which is beyond the scope of this document.
DR-MTDK-BL-13-0403-11	ACEC, NEPA	We also believe that ACEC status is appropriate for the proposed Carbon County PPA for the following reasons:??BLM Manual 1613, item .5 (Relationship of ACEC's to Other Designations), states that the "ACEC designation is the principal BLM designation for public lands "where special management is required to protect important natural, cultural, and scenic resources and to identify natural hazards."" BLM special management areas are supposed to be designated as ACECs. There is no official recognition of PPAs-"only ACECs.??BLM Manual 1613, item 53 C (Other BLM Designations and Management Areas/Special Management Areas Avoided), specifically states that the use of the terms "special area" or "special management area" are to be avoided. These terms are relative and have little useful meaning. This is required to avoid ambiguities and to provide an appropriate context to BLM designation of areas requiring special management attention, consistent with designation authority under the FLPMA and the planning regulations (43 CFR 1610.7)." Note that although PPAs do not specifically use the term "special area" or "special management area," the concept behind PPAs is exactly what Manual 1613 was trying to avoid: ambiguities.??BLM Manual 1613, item 64 (Conformance Determinations and NEPA Compliance), specifically states that -[a]ll actions to be conducted or authorized by a BLM official must be in conformance with the provisions of the RMP as defined in 43 CFR 1601.0-5(b). Whenever an ACEC may be affected by the implementation of an authorized or permitted activity, the decision instrument authorizing the specific action must include a description of the special management measures to be applied. An environmental analysis for a proposed action which might affect an ACEC must identify impacts, if any, on the ACEC and must incorporate by reference the pertinent portions of the EIS prepared for the RMP." Because of this provision, we believe ACEC status for	N	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the B&PPNM RMP/EIS. ACECs are proposed where special management attention is required to protect the important and relevant values in relationship to existing or proposed management in the BLM preferred alternative in the RMP. Should proposed management be present that protects the relevant and important values then ACEC designation is not necessary. All PHMAs were considered and analyzed as an ACEC under Alternative B. See Appendix E for relevance and importance evaluation. Beyond the scope of this document. Much of this will occur at the implementation level.

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		the proposed Carbon County PPA will provide far greater protection for this area than a PPA designation, because specific permitted activities would be subject to an environmental analysis under NEPA, which should include public comment. This provision will prevent an excessive number of waivers, exemptions and modifications to NSO stipulations.		
DR-MTDK-BL-13-0403-12	Wildlife	At a minimum, the BLM needs to use the Montana Fish, Wildlife & Parks (FWP) 2010 sage-grouse 'core areas' as a basis for sage-grouse NSO management designations. These areas need to be NSO to the maximum extent practical.	n	Thank you for your comment. BLM did use FWP Core Area mapping for PHMA mapping. Refer to Map 168. Also, be aware that BLM can only consider public lands in the designated areas. In addition, BLM also designated Restoration Areas and GHMAs beyond the Core Areas. Your NSO protective measure suggestion will be considered when alternatives are selected in the Final RMP/EIS.
DR-MTDK-BL-13-0403-13	Wildlife	In addition to the FWP core areas, we recommend specifically including the portions of Audubon's IBAs that are outside the core areas designated by FWP (see Figure 2 above). Because FWP and Audubon used the same data to establish critical areas, we suggest erring on the side of caution with a declining species and use both boundaries	n	Thank you for the comment. BLM can only manage habitat on public lands. Core area acreage outside of the PHMA designations were excluded either because of land ownership or previous habitat disturbance.
DR-MTDK-BL-13-0403-14	Wildlife	As we learn more about sage-grouse, we are finding out that Montana birds migrate seasonally. Any identified winter range should be protected with timing restrictions AND buffers (preferably a 4 mile buffer).	n	Table 2-6.1, , Alternative B, includes the following: "Surface use for oil and gas exploration (including geophysical operations) would be prohibited from December 1 to March 1 within greater sage-grouse winter range or within 4 miles of a sage-grouse lek (TL). The following special operating constraints apply in greater sage-grouse winter range: surface occupancy and surface disturbance density and / or mitigation plan (CSU) within greater sage-grouse winter range. Your comment will be considered in the Final RMP Decision.
DR-MTDK-BL-13-0403-15	NEPA	We support the addition of a provision (common to all the Alternatives, including the Preferred Alternative) from the HiLine DRMP/DEIS that stated, "[w]here leases or rights-of-way have some level of development (e.g., road, fence, well, etc.) that are no longer in use, the site would be reclaimed by removing the features and restoring the habitat. Upon project completion or right-of-way expiration, roads built and maintained for commercial use across BLM land would be reclaimed, unless based on site-specific analysis, the route provides specific benefits to the public and the continued public use does not contribute to resource conflicts."	N	Thank you for your comment.
DR-MTDK-BL-13-0403-16	Livestock grazing	Because all BLM Alternatives maintain the current level of livestock grazing, this not an adequate range of alternatives. As an example, Table 4.6 (p. 4-9) shows no range of differences in "rangeland improvements" between the alternatives.	n	Please see section 2.4.1 of the DRMP for a detailed discussion as to why a no grazing alternative was considered but not analyzed in detail, as well as the rationale for the level of grazing analyzed in each alternative. Additionally, Table 4.6 of the DRMP is a table of surface disturbance assumptions based on historic disturbance levels in relation to proposed management changes by alternative. Since no alternative specifically reduces or increases the expected level of range improvements, no change is documented.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
DR-MTDK-BL-13-0403-17	Livestock grazing	The BLM should explicitly outline within the Final RMP/EIS the number of grazing allotments within PPAs, the number of those allotments that do not meet specified BLM rangeland standards, the number of allotments with degraded riparian or wetlands areas, and information on how these conditions will be improved.	n	These data are presented in appendix S, but not summarized. 105 Allotments are located or contain some public land within PHMA, four of these allotments are failing one or more standards, 85 of these allotments are meeting all standards, five allotments have not been assessed, and 11 allotments are making significant progress towards meeting standards. On the 15 allotments failing or making significant progress towards meeting standards the riparian standards was listed on two allotments. Changes are implemented on a site specific basis to address resource issues. Common practices to address riparian issues include a season of use change, reduced duration, or exclusion from livestock grazing.
DR-MTDK-BL-13-0403-18	Livestock grazing	We support the addition of a provision (common to all the Alternatives, including the Preferred Alternative) from the HiLine DRMP/DEIS that placed a high priority on monitoring all grazing allotments within PPAs. We also support the commitment to reassessing allotments within PPAs that are either canceled or relinquished to determine if they should be closed to grazing altogether. In order to ensure that this provision is meaningful (and not just words on paper), the BLM should annually report how many allotments are canceled or relinquished within PPAs, and how many are then retired. This report could be placed on the website for the Billings/Pompeys Pillar planning area.	n	Thank you for your comment. In the table of alternatives (Table 2.6.2 - DRMP) Alternatives B and D propose to designate all allotments within PHMA as a management category I or improve grazing allotment. These allotments receive the most vegetation monitoring and compliance inspections. Additionally, under management common to all alternatives (Pg. 2-116) it is stated that if grazing preference on an allotment wholly located within PHMA is voluntarily relinquished, the BLM may consider the retirement of the allotment. When the BLM is considering whether or not to retire the allotment, sage grouse habitat requirements in relation to current livestock use levels would be evaluated.
DR-MTDK-BL-13-0403-19	NEPA,	We support the addition of a provision (common to all the Alternatives, including the Preferred Alternative) from the HiLine DRMP/DEIS that limits wells to 1 well per square Page 10 -" Montana Audubon Comments on Billings/Pompeys Pillar BLM Resource Management Plan mile. In addition to this provision, we request that scientifically-based buffers be established, with other appropriate protective provisions	n	Thank you for your comment. The RFD for the B&PPNM plan revision is 4 wells per year occurring on BLM managed federal mineral estate per year. There are no high potential oil and gas development areas occurring in the federal mineral estate. Full-scale would be four wells per year.
DR-MTDK-BL-13-0403-20	NEPA	Any time the BLM authorizes changes to the NSO or Controlled Surface Use (CSU) stipulations in areas less than 4 miles from a lek, the public should have a chance to comment on the proposal and a site-specific NEPA analysis should be conducted. In addition, the BLM should issue an annual summary of all NSO and CSU stipulations authorized that are within less than 4 miles of a lek.	N	Thank you for your comment. That is currently what the BLM is doing through this land use plan revision.
DR-MTDK-BL-13-0403-21	Wildlife	In all sage-grouse areas where buffers are used, energy development should be prevented-"to the maximum extent possible-"within 4 miles of active leks. Colorado (Colorado Steering Committee 2008) and Wyoming (Governor's Executive Order 2008) have adopted a 4-mile buffer to protect sage-grouse breeding habitat. These buffers were based on regional radio-telemetry data that indicated 80% of nesting occurred within 4 miles of leks. Thus, 20% of the nesting population in these regions may be compromised.	n	Thank you for the comment. Your 4 mile protective measure suggestion will be considered when alternatives are selected in the Final RMP/ EIS.
DR-MTDK-BL-13-0403-	Wildlife	that produce substantial noise, such as compressor stations, should not be allowed near active sage-grouse leks. The BLM should develop a scientifically-defensible provision that has a buffer around industrial sources of noise. For	n	Refer to Appendix AA (section F) refers to BMPs for noise from Fluid Mineral development.

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22		example, all pump stations should be located at least 2 miles from the nearest active lek, but preferably more than 4 miles (Naugle et al. 2011). In addition to a buffer, noise should be prohibited between 1 hour before sunset to 1 hour after sunrise between March 1 and May 15 near leks, unless the activity is specific to inventorying, monitoring, or viewing greater sage-grouse.		
DR-MTDK-BL-13-0403-23	Wildlife	Roads, Pipelines, Communication Towers, and Power (and Transmission) Lines: Development and its associated infrastructure fragment sage-grouse habitat. Habitat fragmentation is believed to be a primary cause of sage-grouse decline and in some areas has already led to population extirpation. Because of this threat: The BLM should NOT authorize new roads, pipelines, communication towers, power or transmission lines, and other permanent structures on sage-grouse winter occurrence points, winter concentration areas, and-“preferably-”within 4 miles of active leks. At a MINIMUM, permanent structures should be located at least 2 miles from active leks (although, as stated above, a 4 mile distance is preferred). In addition, a scientifically defensible buffer should be established for winter occurrence points and winter concentration areas. Any time the BLM changes NSO stipulations or authorizes CSU for a project in areas less than 4 miles from active leks, the public should have a chance to comment on the proposal and a site-specific NEPA analysis should be conducted. We support the DRMP/DEIS provision that roads, pipelines, and other infrastructure should follow existing Rights-of-Way as much as possible. Clustering this infrastructure will fragment less habitat. The BLM should consider adopting stipulations that allow no more than a 3% surface disturbance cap per section in PPAs (Knick et al. 2013), with no more than 5% surface disturbance cap per section in general sage-grouse habitat. It should also be noted that these surface disturbance provision cap levels should be changed if new scientific information indicates that it is not adequate. In addition, compensation should be required with a 1:1 Habitat Compensation Ratio. Requiring compensatory mitigation will better ensure that CSU stipulations provide better protection for sage-grouse.	n	<p>Thank you for the comment. According to Alternatives in Chapter 2, Table 2-6.1 the options you presented are available for decision in the Final RMP. Your comments will be considered in the Final RMP.</p> <p>A process is described in Appendix D.2.6. “Substantial modification or waiver is subsequent to lease issuance is subject to public review for at least a 30-day period.”</p>
DR-MTDK-BL-13-0403-24	Renewable Energy	Excluding commercial wind from the PPA would be consistent with the U.S. Fish and Wildlife Service (USFWS) recommendation to “... avoiding placing wind turbines within 5 miles [8 km] of known leks (USFWS, 2004).” In fact, this standard should be added in the Preferred Alternative for any identified lek on BLM land within the planning area. In addition, buffers around wintering areas for wind turbines in those areas outside of PPHs should be established.	n	<p>The cited 2004 USFWS briefing paper was prepared in regard to studies conducted on the greater prairie chicken. Connelly et al. (2000) recommends a two mile buffer for sage-grouse. Rather than buffers, the preferred alternative designates sage grouse PHMAs and winter range as avoidance areas, regardless of the distance from an occupied lek. Designated avoidance areas are not managed as open, but would require substantial commitment on the part of the proponent and site-specific study before any renewable energy applications would be considered.</p> <p>Given potential future advances in renewable energy technologies, coupled with ongoing research related to impacts of renewable energy development on</p>

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				sage-grouse, total exclusion of renewable energy given the long-term nature of this plan is not warranted.
DR-MTDK-BL-13-0403-25	ACEC	The Pryor Foothills ACEC should be expanded, as proposed by the Montana Native Plant Society (MNPS), to include sections 30 and 31. This expansion is needed to help protect important and rare plant communities.	N	<p>Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the B&PPNM RMP/EIS. Please refer to Appendix E. Areas Of Critical Environmental Concern in the Draft RMP/EIS for a discussion of ACEC Nominations for East Pryor ACEC (BLM nomination), Pryor Foothills Research Natural Area/ACEC (public nomination), and Sykes Ridge Rare Plant ACEC (nomination by Peter Lesica).</p> <p>Please see the 1998 ACEC Assessment and Proposed amendment to the Billings, Powder River and South Dakota RMPs here: http://www.blm.gov/style/medialib/blm/mt/blm_programs/planning/billings_rmp/amendments.Par.94086.File.dat/acecEA.pdf</p> <p>pages 74-76 are the nominations evaluations for the Billings RMP and page 103 shows the map of the nominated vs. recommended ACEC.</p>
DR-MTDK-BL-13-0403-26	ACEC, WSA	The land within the East Pryor ACEC should not be removed from Wilderness Study Areas (WSA) designation. WSA designation alone does not provide adequate protection of this area. WSAs and ACECs are established for very different reasons and managed with different objectives. As described above in our comments, Priority Protection Areas/Priority Areas versus ACEC Status, there is no reason to eliminate the overlapping designations. These compatible "overlapping designations" serve an important purpose of identifying and protecting multiple resource values.	N	<p>Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revision. Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the B&PPNM RMP/EIS</p> <p>ACECs are proposed where special management attention is required to protect the important and relevant values in relationship to management in the BLM preferred alternative in the RMP. Should existing management be present (like a WSA) that protects the relevant and important values then ACEC designation is not necessary. Language is included in the RMP that should congress (ever) make a decision on wilderness in the Pryors, and this area not be designated wilderness, then it would be managed as an ACEC.</p> <p>As WSAs contain the most restrictive management, there is no need for an ACEC to overlap the WSA. The relevant and important values of the East Pryor ACEC are addressed through the management of the WSAs. Your comments have been recorded as per NEPA regulations and they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the B&PPNM</p>

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				RMP/EIS. Thank you for your comments. In regards to the overlapping designations of ACEC/Wild Horse Range/WSAs, the actual management prescriptions (No Oil and Gas development, etc.) are intended to be in place regardless of the land's designation. Please see table 2.63; Page 2-168 for WSA management prescriptions and page 2-147 for management prescriptions in the East Pryor ACEC, as well as page 2-171 for management prescriptions in the PMWHR.
DR-MTDK-BL-13-0403-27	Travel mgnt	The HiLine DRMP/DEIS restricted OHVs to two areas Page 12 -" Montana Audubon Comments on Billings/Pompeys Pillar BLM Resource Management Plan totaling 124 acres. We support a similar limit in the Billings/Pompeys Pillar Final RMP/EIS as long as the location for these areas 1) do not contain wetlands or riparian areas, 2) do not contain quality grasslands or sagebrush habitats, 3) adequately protected wetlands, riparian areas, grasslands, and sagebrush habitats from intrusion by OHVs (through buffers, fencing, etc.), and 3) are not in an area sensitive to wildlife.	n	Thank you for your concern and comments. The RMP decision has only one designated area for cross-country OHV use, the South Hills OHV Area (1,371 acres). Rationale for this decision is found in the RMP. For the remainder of the FO lands, travel is limited to either existing or designated routes. Consideration for route designation was given to resource protection by the Interdisciplinary Team. (see Appendix O and individual Route Inventory forms)
DR-MTDK-BL-13-0403-28	Renewable energy	development should be excluded from the Greater Sage-Grouse PPA, crucial sage-grouse wintering areas, ACECs, and large reservoir waterfowl complexes. Although the DRMP/EIS exclude wind development from specific acres, we are unclear if the BLM recommends an exclusion for the above-listed areas. This request for an exclusion is supported by the U.S. Fish and Wildlife Service (USFWS) recommendation of "... avoiding placing wind turbines within 5 miles [8 km] of known leks (USFWS, 2004)." In addition we would support adding an exclusion provision in the Preferred Alternative for the above-referenced areas for commercial solar development.	n	Pages 2-135 through 2-137of the Draft RMP clearly outline the specific areas and resources that lie within the renewable energy exclusion (78,088 acres) and avoidance (331,088 acres) areas in the preferred alternative. These allocations apply to both wind and solar development. Greater Sage-Grouse PHMAs, Sage-Grouse Winter Range, and riparian areas and wetlands (which would cover large reservoir waterfowl complexes) lie within avoidance areas, where development could not occur unless special stipulations and conservation measures would adequately conserve the habitat of concern. Given potential future advances in renewable energy technologies, coupled with ongoing research related to impacts of renewable energy development on sage-grouse, total exclusion of renewable energy over the long-term is not warranted. Please note that avoidance areas are not managed as open, but would require substantial commitment on the part of the proponent and site-specific study before applications would be considered.
DR-MTDK-BL-13-0403-29	Wildlife	Regarding black-tailed and whitetailed prairie dogs, there needs to be a scientifically-based buffer established that will ensure that prairie dogs expand their occupation of BLM land. These species have been declining in Montana. If surface disturbing activities are allowed within the scientifically-established buffer, then the public should have a chance to comment on the proposal and a site-specific NEPA analysis should be conducted.	n	Thank you for your comment. Prairie dog habitat is defined as, "the maximum extent of areas occupied by prairie dogs at any time during the last 10 years."- source MSO- consistency
DR-MTDK-BL-13-0403-3	Wildlife	Montana has a total of 40 Important Bird Areas, four of which are located partially or wholly within the Billings/Pompeys Pillar planning area boundary: the Musselshell Sate-Steppe IBA; Half breed National Wildlife Refuge and IBA; Bridger Sage-Steppe IBA; and Bear Canyon IBA. Management decisions and direction in the Final RMP/EIS should take into account the location of IBAs,	n	Thank you for the comment. Important Bird Areas (IBAs) are area designated by the National Audubon Society. IBAs are sites that provide essential habitat for one or more species of bird. IBAs include sites for breeding, wintering, and/or migrating birds. There

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		<p>applying appropriate protections to ensure the continued conservation value of these critical habitats. This is especially important given the range-wide population declines documented for birds that breed within grassland and sagebrush-steppe habitats, likely due to widespread habitat loss and alteration (Rich et al. 2004). Specific information and a map on the IBAs within the HiLine District planning area appear below:</p>		<p>are four IBAs within the Billings Field Office Planning Area, three have public lands managed by BLM.. Discussion of the IBAs is referenced on pages 3-86 and 3-99. One of the IBAs was nominated due to the presence of breeding populations of more than a dozen species on the Montana Priority Bird Species List. The foothill canyons in the area have the only known breeding location of blue-gray gnatcatchers in Montana (Audubon.org).</p> <p>Two of the IBAs nominated were identified to accentuate the management of these areas for the conservation of sage grouse and other sagebrush obligate species. Refer to: http://www.mtaudubon.org/birds/sageiba.html. Since Important Bird Areas are not a BLM designation, maps will not be included in the EIS. BLM protections that will protect the two sage grouse IBAs can be found in Chapter 2, Greater Sage-Grouse PHMA, RA, and General habitat, and Appendix C, and Appendix AA, AB. Executive Order 13186- Migratory Birds- is cited on page 2-68. The two IBAs are mostly within PHMAs</p> <p>Halfbreed NWR IBA – Managed by the USFWS and BLM has no management authority.</p>
DR-MTDK-BL-13-0403-30	Wildlife	<p>Increase Areas Protected for Sprague's Pipet. Other than minimal timing restrictions on development activities, we are concerned that there are no special protection or management provisions for Sprague's Pিপits, a BLM Sensitive Species and US Fish & Wildlife Service Candidate Species. There appears to be significant Sprague's Pipit habitat in the northern part of the Billings/Pompeys Pillar planning area (see map below). More Sprague's Pipit habitat should be given a higher level of protection. This could be accomplished by expanding the Greater Sage-Grouse PPA to the west to include protection for this grassland bird and adding specific provisions to protect these birds into the Final RMP/EIS. As a BLM Sensitive Species and a Candidate Species under an Endangered Species Act, with a higher priority than Greater Sage-Grouse, we urge the BLM to protect more of this grassland bird's habitat in Wheatland and Golden Valley Counties. Page 13 -" Montana Audubon Comments on Billings/Pompeys Pillar BLM Resource Management Plan</p>	n	<p>Thank you for the comment. Refer to Table 2-6.1, "Surface-disturbing and disruptive activities would be avoided from April 15 through July 15 in Sprague's pipit habitat. Surface use for oil and gas exploration, (including geophysical exploration) is prohibited from April 15 through July 15 in Sprague's pipit habitat. (TL)</p> <p>Sprague's pipit habitat is defined as "Optimal or Moderately Suitable" habitat classes in MTNHP Maxent Inductive Model of Sprague's pipit breeding habitat (Map 25)</p> <p>Note: There is a very small percentage of public land in Golden Valley and Wheatland counties. BLM can only manage habitat on public lands. Also, Sprague's pipit needs to be added to Tables 2-5 and 2-6.2.</p>
DR-MTDK-BL-13-0403-31	Wildlife	<p>Eagles_ Golden Eagles should have a longer timing stipulation, with a prohibition undistruptive activities from January 1 to August 15 (Draft Montana Golden Eagle Management Guidelines 2012). (e.g., p. 2-73)._ The Preferred Alternative for Bald Eagle and Golden Eagle Nests and Habitat stipulations found on page 2-76 needs to be change: at a minimum, it needs to place this stipulation on nests active within the preceding 7 breeding seasons (and not 5 years, as stated). Seven years is used throughout the plan except in this one location for all other raptors. In addition, the Draft Montana Golden Eagle Management Guidelines (2012) recommends that nests used in the preceding</p>	y	<p>Thank you for the comment. Revisions are being made in the Final RMP/EIS such as the following: Surface occupancy and use is prohibited within ¼ mile of raptor nest sites active within the preceding 7 years. (NSO)</p> <p>Surface use is prohibited within ½ mile of active raptor nest sites from March 1 through July 31. (TL) –source MSO- Consistency</p> <p>The golden eagle nests active in the preceding 10-years was decreased to seven years to be consistent with other raptors.</p>

*Billings and Pompeys Pillar National Monument
Proposed Resource Management Plan and Final Environmental Impact Statement*

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		10-years be the standard.		
DR-MTDK-BL-13-0403-32	Climate	However, the Billings/Pompeys Pillar DRMP/DEIS fails to provide any specific description of how climate change will be addressed. We could not find the BLM's Rapid Ecological Assessment (REA) program even discussed in the DRMP/DEIS. The Northwestern Plains REA, which encompasses this planning area, was initiated in Sept 2010 and was supposed to be completed in early 2013. We ask that the BLM provide greater clarity as to how this REA will be incorporated into the Final RMP/EIS	N	Status of the Northwestern Plains REA can be found at http://www.blm.gov/wo/st/en/prog/more/Landscape_Approach/reas/nwplains.html . The final RMP will be completed before the Northwestern Plains REA is complete.
DR-MTDK-BL-13-0403-33	Wildlife	the BLM should examine the following additional resources concerning climate change:??The National Wildlife Federation recently released a report, Shifting Skies: Migratory Birds in a Warming World (available at: http://www.nwf.org/News-and-Magazines/Media-Center/Reports/Archive/2013/06-18-13-Migratory-Birds-in-a-Warming-World.aspx).??Audubon's 2009 birds and climate report (available at: http://birdsandclimate.audubon.org/). This report documents how 177 of 305 North American migratory bird species have already shifted their winter destinations to the north by an average of 35 miles over the past 40 years. Page 16 -" Montana Audubon Comments on Billings/Pompeys Pillar BLM Resource Management Plan	n	Thank you for the comment. The updated information will be considered in the Final RMP/EIS.
DR-MTDK-BL-13-0403-34	NEPA	Please contact Gary Langham (Chief Scientist, 202- 600-7975, glangham@audubon.org) to discuss use of Audubon's climate predictions	n	Thank you for your comment.
DR-MTDK-BL-13-0403-4	Wildlife	Audubon's IBAs are slightly different in size than the sage-grouse core areas established in 2010 by FWP. Because both efforts relied on the same initial approach to determining core areas, we suggest erring on the side of caution and considering both boundaries when determining the boundary of the BLM's Billings/Pompeys Pillar Sage-Grouse Protection Priority Areas (PPA), avoiding development and disturbance within either the FWP identified core area or the Montana Audubon classified Important Bird Areas (see Figure 2 below). Combining these two boundaries would specifically add acreage to both of the BLM's proposed PPAs.	n	Thank you for the comment. BLM can only manage habitat on public lands. Core area acreage outside of the PHMA designations were excluded either because of land ownership or previous habitat disturbance.
DR-MTDK-BL-13-0403-5	Riparian/wetlands	For riparian and wetland areas, the DRMP/DEIS does not describe the environmental consequences on wetland and riparian vegetation from the alternatives. We would expect this under the Vegetation section, but it is absent. This should be corrected in the Final RMP/EIS.	n	Pages 4-157 through 4-182 describes impacts to riparian and wetland areas from the alternatives.
DR-MTDK-BL-13-0403-6	Riparian/wetlands	We are concerned that under the current RMP, 52% (75.5 miles) of riparian areas are classified as "Streams Functioning at Risk" or "Streams Nonfunctioning" (see Table 3-17). Although the DRMP/DEIS identifies the general reasons for stream degradation (invasive and non-native vegetation infestations, bank alteration from livestock grazing, channel instability, and lack	n	Thank you for your suggestion. Riparian management is a priority in the BiFO. When possible, management changes are being made to improve riparian areas that are Functioning at Risk or Non-Functioning, and to maintain riparian areas that are Properly Functioning.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		of riparian obligate recruitment and riparian vigor), it does not describe the causes of degradation in any detail. Because of the sensitivity of this habitat, we would request that BLM staff categorize the main causes for riparian degradation by percentage and/or miles, and describe how the agency plans to address the root causes of this degradation.		Causes and issues are identified during scoping of new projects, particularly livestock grazing permit renewals. A database is being developed that will satisfy your request, however it will not be finished before the RMP.
DR-MTDK-BL-13-0403-7	Riparian/wetlands	The miles found in Table 3-17 for riparian areas do not match the miles found in Table 2-1, which is confusing. Alternative B in Table 2-1 indicates that 189 miles of riparian area would be designated a "high priority recovery area," yet Table 3-17 indicates that there are only 75.5 miles of stream that are "Streams Functioning at Risk" or "Streams Nonfunctioning." We are unclear what the difference numbers mean.	n	<p>Thank you for catching this error. The numbers will be re-calculated and corrected in respective chapters/tables/analysis.</p> <p>Table 2-1 should indicate the number of miles by alternative, of "Priority Riparian Habitat" which in alternative B is 78, C is 13 and D is 51. It will be corrected.</p> <p>The difference between table 2-1 and table 3-17, is that specific types of riparian areas are identified by alternative in 2-1, while all known riparian areas are identified in 3-17. The number in 3-17 will be higher than any numbers in 2-1.</p> <p>The alternative tabke has been changed to address your comment.</p> <p>Alternative B: Priority Riparian Habitats would include riparian areas associated with Perennial streams, fish bearing streams, cottonwood galleries and riparian areas within sage grouse PHMAs.</p> <p>Alternative C: Priority Riparian Habitats would include riparian areas associated with YCT populations and suitable recovery habitat, Blue and Red Ribbon streams and Cottonwood Galleries.</p> <p>Alternative D: Priority Riparian Habitats would include riparian areas associated with perennial streams and cottonwood galleries.</p>
DR-MTDK-BL-13-0403-8	Riparian	All wetlands and riparian areas should be designed NSO areas-"with no exception for waivers, exemptions and modifications-"for all development activities, unless roads and bridge abutments are required at river or stream crossings. In addition, buffers need to be established that adequately protect fish and wildlife/aquatics (i.e., all wetland and riparian areas). Examples of adequate buffers can be found in numerous publications, including Ellis, 2008.	N	Thank you for your comment.
DR-MTDK-BL-13-0403-9	Water	Floodplains should be a NSO area-"with no ability to grant waivers, exemptions and modifications-"for all development activities. It appears that Alternative B contains this provision, but Alternative D does NOT. Instead, Alternative D only	y	Thank you for your comment. A new text has been added to chapter 2 to address your comment and a new stipulation has been included in Appendix C.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		<p>has this provision apply to "designated" 100-year floodplains. Because floodplain delineation (i.e., designation) has NOT occurred in most (if not all) of the planning area, this stipulation provides virtually no protection to these sensitive areas. We specifically ask that the BLM require that all floodplains be protected from development. In those areas where floodplain delineation has not taken place, the developer would have to delineate the floodplain on a case-by-case basis. This information should be required-"and these areas should then be added to the state's floodplain maps.</p>		
<p>DR-MTDK-BL-13-0404-1</p>	<p>Travel mngt</p>	<p>For all wilderness quality lands identified in the Draft RMP, please:- Close the areas to new road construction, powerline or pipeline rights-of-way, mining, oil and gas leasing, motorized recreation, and new facility construction unless related to protection of their wilderness character. Also, please:- Reconsider the motorized trail network in the Pryor Mountains and identify opportunities for at least one quiet, designated non-motorized route. For example, closing the Demijohn Flat route to motorized use would provide a quiet trail while also helping to protect sensitive cultural resources .- Close the two-track trail into Bear Canyon to motorized use beyond the canyon mouth because two parallel motorized routes provide motorized access into this part of the Pryors.</p>	<p>n</p>	<p>Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS</p> <p>In regards to the Bear Canyon route, the RMP has a range of possible decisions. In this case, due to the conditions you mentioned the Alternative D has been modified to reflect the current conditions. The route will be designated as "closed"</p> <p>Also note that BLM Manual 1626 (Travel and Transportation) specifies that BLM establish a comprehensive program for both motorized and non-motorized travel. This will be done in this RMP.</p> <p>Please see the end of Table 2.6.1 for Lands with Wilderness Characteristics, management prescriptions, and then refer to other sections in the table for the specific areas/units not found to possess wilderness characteristics and their management prescriptions – many have the same regardless of designation</p> <p>Thank you for your comments.</p> <p>In regards to your comment,</p> <p>While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS</p> <p>Specifically note that the following changes have been made to the document:</p> <ul style="list-style-type: none"> • There is a designated non-motorized trail component of the Travel and Transportation System. It can be found in Appendix O • This non-motorized trail system includes a trail in Bear Canyon, as requested by numerous commenters. • Sage Grouse PHMAs are designated as NSO. • Lands which have passed lands with wilderness characteristics inventory are

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
				not necessarily managed for lands with wilderness characteristics values, (Bad Canyon, Weatherman Draw, Bear Canyon) but none of the areas are open for OHV use unless for administrative purposes • Other management restrictions are also in place through different resource programs and are identified in the RMP.
DR-MTDK-BL-13-0404-2	Wildlife	- Close all Sage Grouse Priority Protection Areas to oil and gas leasing, or stipulate the areas for "No Surface Occupancy" with no exceptions, waivers or modifications.	n	Thank you for the comment. Your comment will be considered when alternatives are selected in the Final RMP/ EIS. The No Lease and NSO alternatives are included in the analysis and alternatives.
DR-MTDK-BL-13-0405-1	National Historic Trails	Executive Summary, ES 181.6.1.18.3 The environmental consequences of implementing the agency preferred Alternative D is not included in this summary paragraph on National Historic Trails (NHTs) and should be added. Chapter 4 Environmental Consequences, 4-6204.6.8.1 Same comment as above	n	Thank you very much for comment. The RMP text has been altered to reflect your comment and concerns
DR-MTDK-BL-13-0405-2	National Historic Trails	Chapter 4 Environmental Consequences, 4-5814.4.6 The map that illustrates the Lewis and Clark and Nez Perce NHTs is number 166, not 175	n	Thank you very much. The Alternative D discussion has been added to the RMP text.
DR-MTDK-BL-13-0405-3	National Historic Trails	Chapter 4 Environmental Consequences, 4-5854.4.6.3.5 This paragraph describes potential impacts to NHTs from recreation that are common to all alternatives. The discussion of NHT routes should include water trail designations as this is the recommended type of trail development for the Lewis and Clark NHT segment from Buffalo Mirage Access site near Park City to the mouth of the Yellowstone River (Lewis and Clark National Historic Trail Comprehensive Plan for Management and Use, January 1982). Given the potential confusion between the different route designations associated with NHTs (historic route, land or water trails, and auto routes), we suggest rewording the third sentence to read, "Additionally, many NHT visitors follow the trail via designated auto tour routes rather than hiking or water trails, although there are opportunities for hiking and other outdoor activities along the historic route." The last sentence of this paragraph appears incomplete or out of place	n	Thank you very much for comment. The RMP text has been altered to reflect your comment and concerns. Also in reference to the 5th comment in the table found in the letter submittal, table 2-6.3 does provide information on changes between Alternatives for resources and activities that may affect the PPNM.
DR-MTDK-BL-13-0405-4	ACEC	Map 157 & 158 The maps provided of Pompeys Pillar National Monument show the slight change in Management Areas A and B between the current condition (Alternative A) and the action alternatives, which are all the same. Given the significance of the site and specific management issues associated with the monument, we suggest consideration of adding additional maps to better demonstrate the differences between the current management and action alternatives outlined in Table 2-6.3. It would also be informative to include information on proposed management actions by alternative beyond the monument boundaries and in the vicinity that may impact the monument such as right-of-way exclusion zones and visual resource management classifications	N	Thank you for expressing your concerns. The changes in acreage are due to better technology (use of GIS) when calculating acreages. Beyond the 432 acres of BLM managed public land at of PPNM and ACEC, there is no adjacent public land within to manage the viewshed. The ACEC is an avoidance area for ROWs.
DR-MTDK-BL-13-0405-5	National Historic Trails	With the recent release of the Miles City, HiLine, and this draft RMP, the NPS noted inconsistencies in the approach to addressing the management and protection of NHTs across these BLM planning areas. While we understand that	n	Thank you for the comments. The BiFO staff has brought the subject to the attention of the NLCS lead for the Montana/Dakotas

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		there will be differences based on local and regional issues, the NPS would like to work with the BLM on finding opportunities for greater consistency in management of the Lewis and Clark National Historic Trail		
DR-MTDK-BL-13-0407-2	Wildlife	Much research just recently completed indicates Greater Sage-Grouse are very fragile to increasing habitat changes such as energy development, ground vibrations, noise, land disruption, and human encroachment. It is noted that BLM lands in South Central Montana are absolutely critical for migration, nesting, breeding, and connectivity of Greater Sage-Grouse habitat. Therefore it is recommended that all Greater Sage-Grouse Protections Areas be closed to oil and gas leasing and that a buffer zone of 4 miles be emphasized as critical for survival of Greater Sage-Grouse. It is also noted and emphasized that Greater Sage-Grouse are a bellwether for many other wildlife and plant species that are now feeling impact of human encroachment.	n	Table 2-6.1, page 2-77, Alternative B states, "Closed to future oil and gas leasing, exploration and/or development and prohibit other surface disturbing and disruptive activities (NL). Surface occupancy and use would be prohibited in all PHMA habitat areas. Leases would not be renewed upon expiration Table 2-6.1, pages 2-76, Alternative B, includes the following: "Surface use for oil and gas exploration (including geophysical operations) would be prohibited from December 1 to March 1 within greater sage-grouse winter range or within 4 miles of a sage-grouse lek (TL).
DR-MTDK-BL-13-0407-3	Travel mngt, wildlife	Bear Canyon is identified as an Audubon Important Bird Area. This is one of the first Important Bird Areas identified in Montana which is described as: Bear Canyon supports breeding populations of more than a dozen species on the Montana Priority Bird Species List. It also has the highest known number of nesting Blue-gray Gnatcatchers among the handful of foothill canyons in the area that constitute the entire range of the species in Montana. The riparian corridor is home to a rich diversity of Neotropical migrants, and the adjacent uplands are inhabited by Common Poor wills, Loggerhead Shrikes, Sage Thrashers, Green-tailed Towhees, Pinyon Jays, and the occasional broods of Greater Sage-Grouse. This area requires special protections to prevent mining or energy development and to limit road uses. There are multiple duplicate motorized routes in this area which often result in excessive loop ATV use. It is specifically recommended that two track leading to mouth of Bear Canyon be closed to allow survival of the Bear Canyon Important Bird Area.	n	Thank you for the comment. Important Bird Areas (IBAs) are area designated by the National Audubon Society. IBAs are sites that provide essential habitat for one or more species of bird. IBAs include sites for breeding, wintering, and/or migrating birds. There are four IBAs within the Billings Field Office Planning Area, three have public lands managed by BLM.. Discussion of the IBAs is referenced on pages 3-86 and 3-99. One of the IBAs was nominated due to the presence of breeding populations of more than a dozen species on the Montana Priority Bird Species List. The foothill canyons in the area have the only known breeding location of blue-gray gnatcatchers in Montana (Audubon.org). Two of the IBAs nominated were identified to accentuate the management of these areas for the conservation of sage grouse and other sagebrush obligate species. Refer to: http://www.mtaudubon.org/birds/sageiba.html . Since Important Bird Areas are not a BLM designation, maps will not be included in the EIS. BLM protections that will protect the two sage grouse IBAs can be found in Chapter 2, Greater Sage-Grouse PHMA, RA, and GHMA, and Appendix C, and Appendix AA, Executive Order 13186- Migratory Birds- is cited on page 2-68. The two IBAs are mostly within PHMAs. Halfbreed NWR IBA – Managed by the USFWS and BLM has no management authority. Thank you for your comments. This comment has been addressed in the Travel Management Comment Section and the Wildlife Comment Section. Specifically for travel, the routes have been designated as closed to motorized vehicles and the main route has been designated as a non-motorized trail
DR-	lands with	Lands with Wilderness Characteristics are very limited and once lost, can never	n	Thank you for your concerns and comments. BLM follows Manual 6301 in

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
MTDK-BL-13-0407-4	wilderness characteristics	be replaced. Lands with Wilderness Characteristics are extremely limited in the South Central RMP - only 3.1% of the entire South Central BLM Region are designated as having wilderness characteristics. Prairie, grasslands, and foothills are often overlooked in terms of wilderness simply because they do not have high altitude mountains. Yet these areas have vast and undisturbed naturalness, wildlife, and solitude. It is therefore emphasized that areas including but not limited to Penney Peak, Tracts 1 and 4 in Pryor Mountain Unit, Weatherman Draw, Bad Canyon, Yellowstone River Islands, and Clark's Fork River Islands be added to lands that are designated and treated as lands with wilderness characteristics. It is specifically recommended that Demijohn Flat in Pryor Mountains be closed to motorized use to allow connectivity with Burnt Timber Canyon Wilderness Study Area and other lands with wilderness characteristics. This also would protect a culturally sensitive area.		conducting its wilderness inventories and Manual 6302 when considering lands with wilderness characteristics during planning. These Manuals implement Secretarial Order 3310 and incorporates principles from BLM guidance (Organic Act directives) and legal rules developed as part of BLM's original wilderness inventories. A number of the units you mentioned (Bad Canyon, Weatherman Draw, some of the Yellowstone River islands, Tract 1 in the Pryor Mountains,) do possess wilderness characteristics. Tract 4 of the Pryor Mountain Unit does not currently meet the size criteria. Please see Appendix K for details. You are correct to note that should one of the two mentioned vehicle routes be closed and-or become unusable for motorized use, that Tract 4 would then be adjacent to a WSA. Please note that the Billings Field Office has chosen a management direction in the chosen Alternative which do not specifically manage for lands with wilderness characteristics resource values but which have management actions which provide for protection of those resources, as in the case of Weatherman Draw, Tract 1, the Yellowstone Islands and Bad Canyon. In regards to your comment regarding the Demijohn Flat route, the RMP has a range of possible decisions. In this case, due to the conditions you mentioned the Alternative D has been modified to reflect the current conditions. The route will be designated as "closed" to motorized vehicles and as a non-motorized trail Refer to map 146
DR-MTDK-BL-13-0410-1	Edits	There should also be a map of dams, ponds, lakes and if possible wetlands. A map of areas with slopes would be nice (topographic map). There should be a map of mountain lion habitat areas	n	Thank you for your comment. Text has been edited in response to your comment.
DR-MTDK-BL-13-0410-2	Edits	The vegetation map (map 9) combines too many classes of vegetation in each color, that don't always relate. For example we were trying to figure out where the areas with tree cover type were and thus figure out your potential mountain lion habitats. It seems generally that areas of trees would be the various shades of green. But the lightest green shade: 2,001-2,016 combines Woodlands with Sparsely Vegetated Systems, and the darkest green shade (2061-2072) combines Aspen-Mixed Conifer Forest and Woodland with various Woodland/Shrubland types and Shrubland types. It seems the green colored areas could have been broken into more consistent and meaningful subsets. Why are woodlands merged with sparsely covered areas? Why are Aspen/Conifer vegetation merged with Dwarf Sagebrush Shrubland and Steppe? Other trees are mixed with other prairie in the 2,153-2,179 set. I have not studied all subsets to see if this problem exists for other subsets, but we would like wetlands to be different from the other 3 vegetation classes it is merged with and some of the other water associated vegetation (in other subsets) could be merged into a sub set related to saturated soils. There does not seem much	n	Thank you for your comment. Text has been edited in response to your comment.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		logic to the clusters. When listing the classes of vegetation that relate to the subsets (see -Vegetation Definitions list), you should create a space or a line between each subset break, so it is easier to read and relate to the map legend		
DR-MTDK-BL-13-0410-3	Wildlife	If identifying potential transmission corridors for power lines, please discuss the debate among scientists over whether there is a risk (or no risk) from ELF radiation. Please discuss the relationship of your transmission line corridors to people's houses (discuss the distance from line corridor to houses), especially higher density developments and any potential mitigations to avoid transmission lines being placed directly over high density population areas or directly over houses of concerned folk who might object to that	N	Thank you for your comment. This is beyond the scope of this document
DR-MTDK-BL-13-0410-4	Wildlife	Please differentiate between "big game" animals that are "prey" species and those that are "predator" species and discuss them differently in the sections on affected environment and environmental consequences and mitigations. The issues with predators and prey are not always the same. You like the other BLMs seem to see the "big game" as the prey species during your effects section, when you discuss the effects of BLM management choices. . But you have comparatively more references to predators in the Big Game consequences section (Chapter 4) than Hi-line (once again you win the prize). However we ask in your Chapter 4 "Big Game" discussion, that you differentiate between "Big Game" that is prey/herbivore and "big game" that is predator of the herbivores when you discuss the effects of your actions	n	Thank you for the comment. Predator control is described in "Management Common to all Alternatives", Table 2.6.1, . BLM also has a Memorandum of Understanding (MOU) with APHIS –Wildlife Services (WS) that describes responsibilities of each of the agencies. WS is responsible for preparation of the NEPA documentation, annual Animal Damage Management Work Plan, and implementation. BLM cooperates with review and approval of their plans on public lands. As a reminder, BLM manages habitat, while Montana Fish, Wildlife, and Parks manages the wildlife.
DR-MTDK-BL-13-0410-5	Wildlife	Discuss the effects of large predators on ecosystem and particularly any species protected under the Endangered Species Act or otherwise believed to be at risk. Will large predators help by reducing medium and small predators, helping with riparian areas recover or will they make it worse by eating special species (or both)? Please discuss the effect of predators, (large, medium and small ones) on your species targeted for protection	n	Predator control was not included as a threat in the FWS's listing decision; however, the BLM and the Forest Service acknowledge that localized predation may be a factor in the conservation of greater sage-grouse in some areas. In these areas, the states possess primary authority and responsibility for managing the wildlife within the state and the BLM and the Forest Service are responsible for managing habitat. Montana Fish, Wildlife and Parks manage wildlife within Montana, while the BLM and Forest Service focus on managing habitat. Consistent with a Memorandum of Understanding between the BLM and the US Department of Agriculture, Animal and Plant Health Inspection Service-Wildlife Services, the BLM and Forest Service will continue to work with Montana Fish, Wildlife and Parks to meet state wildlife population objectives. Predator control is allowed on BLM- and Forest Service-administered lands and is regulated by the MT FWP and Animal Plant and Health Inspection Service (APHIS). APHIS conducts environmental analyses in accordance with the National Environmental Policy Act (NEPA). The BLM and Forest Service will continue to work with agencies to address current predation of greater sage-grouse, and BLM and Forest Service-administered lands in the planning area will remain open to predator control under state laws. Additionally, the BLM and the Forest Service will continue to work with the involved states to meet state wildlife population

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
				<p>objectives. While adding management actions specifically to manage predators is outside the scope of the amendment, the BLM and the Forest Service have authority to manage the habitat and have provided numerous management actions across the range of alternatives. Altering the sagebrush habitat of the greater sage-grouse can create an influx of predators into an area and lead to a population decline. Roads, fences, power lines, trails and other disturbances may make access easier for potential predators and increase risks to the species. The Draft EIS calls for measures that will substantially reduce disturbances in the bird's habitat, thus reducing predation risk. The Draft EIS also calls for careful monitoring of grazing allotments within sage-grouse nesting habitat to ensure suitable grass and forb cover is reserved so we can minimize the associated predation risks.</p> <p>Predator control is described in "Management Common to all Alternatives", Table 2.6.1, . BLM has a Memorandum of Understanding (MOU) with APHIS –Wildlife Services (WS) that describes responsibilities of each of the agencies. WS is responsible for preparation of the NEPA documentation, annual Animal Damage Management Work Plan, and implementation. BLM cooperates with review and approval of their plans on public lands. Predator control is referenced in Appendix AA (section F), "Mitigation Measures and Conservation Actions for Greater Sage-Grouse Habitat".</p>
DR-MTDK-BL-13-0410-6	Wildlife	Please discuss all your "predator control" programs and how you work with APHIS, private landowners and/ or the state with predator control. You have a few short mentions of this, saying you have a relationship, but don't explain in any depth. We want a full discussion of all your predator control efforts and which species they are directed against and how effective they are. For example many folks are critical of some coyote removal programs, claiming them as ineffective because the coyotes just respond to the deaths by having more babies	n	<p>Predator control is described in "Management Common to all Alternatives", Table 2.6.1, page 2-69. BLM has a Memorandum of Understanding (MOU) with APHIS –Wildlife Services (WS) that describes responsibilities of each of the agencies. Predator control was not included as a threat in the FWS's listing decision; however, the BLM and the Forest Service acknowledge that localized predation may be a factor in the conservation of greater sage-grouse in some areas. In these areas, the states possess primary authority and responsibility for managing the wildlife within the state and the BLM and the Forest Service are responsible for managing habitat. Montana Fish, Wildlife and Parks manage wildlife within Montana, while the BLM and Forest Service focus on managing habitat. Consistent with a Memorandum of Understanding between the BLM and the US Department of Agriculture, Animal and Plant Health Inspection Service-Wildlife Services, the BLM and Forest Service will continue to work with Montana Fish, Wildlife and Parks to meet state wildlife population objectives. Predator control is allowed on BLM- and Forest Service-administered lands and is regulated by the MT FWP and Animal Plant and Health Inspection Service (APHIS). APHIS conducts</p>

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				<p>environmental analyses in accordance with the National Environmental Policy Act (NEPA). The BLM and Forest Service will continue to work with agencies to address current predation of greater sage-grouse, and BLM and Forest Service-administered lands in the planning area will remain open to predator control under state laws. Additionally, the BLM and the Forest Service will continue to work with the involved states to meet state wildlife population objectives.</p> <p>While adding management actions specifically to manage predators is outside the scope of the amendment, the BLM and the Forest Service have authority to manage the habitat and have provided numerous management actions across the range of alternatives. Altering the sagebrush habitat of the greater sage-grouse can create an influx of predators into an area and lead to a population decline. Roads, fences, power lines, trails and other disturbances may make access easier for potential predators and increase risks to the species. The Draft EIS calls for measures that will substantially reduce disturbances in the bird's habitat, thus reducing predation risk. The Draft EIS also calls for careful monitoring of grazing allotments within sage-grouse nesting habitat to ensure suitable grass and forb cover is reserved so we can minimize the associated predation risks.</p>
DR-MTDK-BL-13-0412-1	Travel mngt	My property is located 9 miles west of Highway 72 on Grove Creek Road. In looking at the map, I notice that the road through the private property is not correct. I am in section 11, parcel 2 and the actual road goes west along the north side of my property line. The road established in 1979 no longer exists. I am very concerned about closing the BLM roads from Highway 72 to my property.	n	Thank you for expressing your concerns. They have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS. Please know that BLM does not establish route determinations on private lands. Gold Creek Road (GC 1047), provides public access to the private lands in Section 11 through public lands and this route intersects with Meeteetse Trail, a county-maintained road which originates at Highway 72. Refer to map 150.
DR-MTDK-BL-13-0412-2	Fire Ecology and Management	I am sending this email regarding my concerns about travel to my property, fire protection in case there is a fire in the National Forest.	n	<p>Thank you for expressing your concerns. They have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS.</p> <p>In regards to the road location you mention, please know that BLM does not establish route determinations for roads on private lands. Otherwise, Gold Creek Road (GC 1047), provides public access to the private lands in Section 11 through public lands and this route intersects with Meeteetse Trail, a county-maintained road which originates at Highway 72. Please refer to map 150. TF</p> <p>In response to your comment, the text in Alternative D for the Grove Creek</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
				ACEC of the Proposed RMP and Final EIS has been revised to state: Wildfire management (natural ignitions) for resource benefit. Full range of fire management activities would be used in ACEC in response to human-ignited fires. Use of heavy equipment and retardant would be avoided unless approved by authorized officer.
DR-MTDK-BL-13-0413-1	Wildlife	These comments conclude that the conservation of biological diversity, specifically sage-grouse core habitat as well as other BLM sensitive or special status species, by conserving intact landscapes with functioning ecological processes, should be a major concern and high priority in the Billings District RMP due to the areas of important biological diversity and sage-grouse core areas in the planning area. While we recognize that the planning area also provides for many other resource uses and other guidance governs these planning decisions, BLM's implementation of strong sage-grouse conservation measures is crucial to the success of efforts being undertaken by a diversity of land stewards for this imperiled species.	n	Thank you for the comment. Your comment will be considered when alternatives are selected in the Final RMP/ EIS.
DR-MTDK-BL-13-0413-10	Riparian/wetlands	In order to ensure the protection of disturbance-sensitive areas, such as sage-grouse priority areas or riparian and wetland habitats, no waivers, exceptions or modifications should be allowed for those areas when the BLM identifies a No Surface Occupancy stipulation. If waivers, exceptions and modifications are allowed, then the BLM should set up a process that allows the public to comment when these are actions considered.	n	A process is described in Appendix D.2.6. "Substantial modification or waiver is subsequent to lease issuance is subject to public review for at least a 30-day period." Thank you for your concern and comment. It is not necessary to eliminate WEMs from sensitive habitats due to the process for which WEMs are granted. A developer must submit a plan that describes how the activities will not have unacceptable adverse impacts to the resource. This plan is approved by the authorized office, who would consult with the appropriate specialists to ensure the plan met resource objectives. For complete details of stipulations, WEMs and resource objectives, see Appendix C.
DR-MTDK-BL-13-0413-11	Travel mngt	Off-road vehicles can damage vegetation and soils, introduce and foster the growth of noxious weeds, and allow recreational shooters easy access to remote areas, including prairie dog colonies. WWF recommends that off-road vehicle use be limited to designated routes, and existing trails that have not been specifically designated for motorized use should be closed to motorized use and rehabilitated. The BLM should also ensure that off-road vehicle regulations are enforced.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS. Specifically, with the exception of one Area designated for cross-country Motorcycle Use, the remainder of the FO lands is designated as "limited" for OHV use, meaning that travel is restricted to designated or existing routes. Closed vehicle routes may be used for non-motorized travel and in some cases are designated as specific trails. Compliance with legislations is not an issue for the RMP to consider – it is a n enforcement issue.
DR-MTDK-BL-13-0413-12	Wildlife	The body of science on temperate grasslands conservation continues to grow especially in regards to sage-grouse conservation. WWF supports the adoption of management actions based upon the best available science and supports the incorporation of that science into the RMP. In regards to sage-grouse conservation, much of the current science was recently compiled in A Report on National Greater Sage-Grouse Conservation Measures which was produced by	Y	Thank you for your comment. Please see Appendix AB for a crosswalk between the COT report how this document is addressing the threats identified in the COT report. Thank You for the comment. BLM intends to rely on the latest research and best available science by utilizing existing research and delaying final decisions until the

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		<p>the sage-grouse National Technical Team (Sage Grouse National Technical Team 2011) as well as in the recently released USGS Summary of science, activities, programs, and policies that influence the rangewide conservation of Greater Sage-Grouse (<i>Centrocercus urophasianus</i>) Open-File Report (Manier et al 2013). WWF supports the incorporation of the information from of these reports to the greatest extent possible in the Billings RMP revision. We recognize that studies on sage-grouse, sagebrush and energy development in the region is also ongoing (e.g., the USGS Range-Wide Genetic Connectivity of Greater Sage-Grouse Populations study (http://fresc.usgs.gov/research/researchPage.aspx?Research_Page_ID=123) and several projects on sagebrush, sage-grouse and impacts of energy development recently funded by the Plains and Prairie Potholes Landscape Conservation Cooperative) and several planning efforts are underway (e.g., the recently formed MT Governor's Sage Grouse Advisory Council). Recent research Knick (2013), further underscores the low and underestimated tolerance of sage-grouse for disturbance. As the body of research on these issues continues to develop, we encourage the BLM to err on the side of caution in selecting adequate conservation measures for protection that will be followed for the next 15-20 years. WWF supports the adoption of conservation measures for sage-grouse conservation that are based on the best available science. WWF strongly supports incorporating the results of new sage-grouse studies into the RMP, and future management, as they become available.</p>		Governor's Sage Grouse Advisory Council recommendations are final, incorporating the "USGS Range-Wide genetic Connectivity of Greater Sage-Grouse Populations" study when it is complete, and incorporating other future research through the "Adaptive Management" approach described in Section 2.3.4.
DR-MTDK-BL-13-0413-13	Edits	p. 3-56 "Cooperative Week Management Area" should be "Cooperative Weed Management Area".	n	Thank you for your comment. Text has been edited in response to your comment.
DR-MTDK-BL-13-0413-14	Wildlife	As noted in the plan, parts of the planning area have been identified as sage-grouse core areas. These areas have been identified as critical to sage-grouse conservation, by Montana Fish, Wildlife and Parks (MFWP). This RMP revision provides a well-timed opportunity to ensure the protection of sage-grouse habitat in the area and ensure connectivity to other populations. We encourage the BLM to work with stakeholders to balance resource use and pursue strategies based on the best available science that have the best chance of stabilizing or improving the condition of this priority species and its habitat.	n	Thank you for the comment. BLM can only manage habitat on public lands. Core area acreage outside of the PHMA designations were excluded either because of land ownership or previous habitat disturbance.
DR-MTDK-BL-13-0413-15	Wildlife	WWF supports the conservation of sage-grouse habitat to conserve this imperiled species but also supports the conservation of sagebrush habitat because it supports a number of other species and is a unique and imperiled vegetative community. Strong measures for conservation of sagebrush habitat will also benefit many other less studied species including several of BLM's special status species as well as provide benefits associated with large areas of intact habitat.	n	Thank you for the comment.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
DR-MTDK-BL-13-0413-16	Wildlife, Renewable Energy	The BLM identified fragmentation from energy development as a primary threat to sage-grouse conservation in the eastern region of its range. Impacts to sage-grouse include habitat fragmentation and direct loss, disturbances related to energy (oil and gas, and wind) exploration, development and production, pathogens (West Nile virus), and overhead powerlines. WWF agrees that fragmentation and loss of habitat especially by surface-disturbing or disruptive activities and noxious weeds, are critical issues to address in the conservation of sage-grouse and advocate that the strongest conservation measures in relation to these issues be adopted. WWF agrees with the BLM that within Management Zone 1 of the eastern region of sage-grouse range, in the context of private land development of energy resources, the ecological and conservation importance of sage-grouse on public lands is elevated. The identified impacts should all be addressed in BLM's revised RMP and our specific comments on alternatives reflect that.	n	Thank you for expressing your concerns. Please refer to the DRMP page 2-63, Table 2.6-1, Section: "Vegetation: Invasive Species and Noxious Weeds - Management Common to All Alternatives" for a discussion regarding the treatment of noxious and invasive species for oil and gas operations, sage grouse habitat and treatment priorities. Concerns with surface-disturbing or disruptive activities, noxious weeds, and habitat fragmentation were considered and impacts disclosed in the designation of exclusion, avoidance and open areas for renewable energy (both solar and wind development) in the plan. Approximately 78,088 acres are excluded from any development, 331,088 acres are avoidance, where BLM would generally not entertain proposals, though under certain circumstances and dependent on the specific proposal, such development might be allowed with special stipulations and conservation measures. The preferred alternative considers only 5% of the BLM-administered land in the Billings Field Office (20,937 acres) as open based on anticipated limited resource concerns in those areas.
DR-MTDK-BL-13-0413-17	Wildlife	As noted in the plan (p.1-6), in March 2010, the US Fish and Wildlife Service published its listing decision for the Greater Sage-Grouse as "Warranted but Precluded" and identified inadequacy of regulatory mechanisms as a major threat. The conservation measures within the BLM Resource Management Plans are its principal regulatory mechanism and must incorporate objectives and adequate conservation measures in order to conserve, enhance, and/or restore Greater Sage -Grouse habitat, and thus reduce the need to enlist the species as endangered or threatened under the Endangered Species Act.	n	Thank you for the comment. Your comment will be considered when alternatives are selected in the Final RMP/ EIS.
DR-MTDK-BL-13-0413-18	Wildlife	WWF commends and supports the BLM's use of most of MT's core areas to identify Protection Priority Areas as these are vitally important to the health and persistence of sage-grouse populations. Because these areas are of highest importance for sage-grouse populations, those actions deemed to best protect these areas should be adopted, even if at the expense of other resource values. The BLM determined that the impacts from measures adopted, even if at the expense of other resources values. The BLM determined that the impacts from measures adopted in Alternative B would be negligible inside the PPA (p. 262) having the best results for sage-grouse core areas among the alternatives (p. 4-287) and that both an ACEC or a PPA designation would yield the same results.	n	Thank you for the comment. Your comment will be considered when alternatives are selected in the Final RMP/ EIS.
DR-MTDK-BL-13-0413-19	Wildlife	since the BLM Montana-Dakota's template recommends that Protection Priority Areas should endeavor to improve and enhance habitat (http://www.blm.gov/pgdata/etc/medialib/blm/wo/Communications_Directorate/public_affairs/sage-grouse.Par.14184.File.dat/s-g_blm_montana_web.pdf), we encourage the BLM to adopt more measures to enhance habitat in core areas especially in the southern core area that has fewer improvements (p. 4-288). If Alternative D's NSO stipulation were to be adopted, it should also exclude any waivers, exceptions or modifications if those do not meet the regulatory certainty	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS. Public comment periods are part of the NEPA process and should a waiver, exception, or modification be part of the stipulation, the WEMs would be considered and analyzed during the NEPA process. Refer to Appendix

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		required, and should include a public process to allow public comment when any exceptions or modifications are proposed to these critical areas.		D.2.6, Waivers, Exceptions, Modifications , page D-5. The last sentence of the first paragraph states that, “Substantial modification or waiver is subsequent to lease issuance is subject to public review for at least a 30 day period through the NEPA process. Also, Appendix C, Oil and Gas Lease Stipulations – where some stipulations have Waiver, Exception, Modification conditions described. Comments should be directed at those descriptions.
DR-MTDK-BL-13-0413-2	Wildlife	We recognize that principal issues concerning wildlife habitat are surface-disturbing and disruptive activities (p. ES-12) as well as other forms of fragmentation such as introduction of invasive species (p. ES-11), particularly those associated with energy development, and recognize that these also impact other resource values. Addressing these issues and minimizing their impacts to native species, and specifically sage-grouse, within the Billings RMP should be of primary importance. We recognize that the BLM needs to incorporate explicit objectives and adequate conservation measures into this RMP to conserve greater sage-grouse as part of preventing a listing under the ESA (p. 1-6), and that the BLM has clearly identified this as a priority in the Billings District Draft RMP/EIS.	n	Thank you for the comment.
DR-MTDK-BL-13-0413-20	Wildlife	The BLM should ensure that new information on connectivity from new studies including the USGS Range-Wide Genetic Connectivity of Greater Sage-Grouse Populations study (http://fresc.usgs.gov/research/researchPage.aspx?Research_Page_ID=123) is incorporated and appropriate conservation measures are adopted in the RMP. The BLM should clarify in the Environmental Consequences section the impacts of the management actions for Alternative D's General Habitat Areas and Restoration Areas. Although this is clearly done in other sections it appears to be missing in the preferred alternative section.	n	Thank you for your comment. Text has been changed in Chapter 4 to address your concerns.
DR-MTDK-BL-13-0413-21	Wildlife	The adopted alternative should include conditions that all pump stations and other permanent structures should be placed a minimum of 2 miles (3.2 km) from the nearest lek, with a preferred distance of >4 miles (6.4 km) from active leks.	n	Thank you for your comment. Appendix AA (section F) describes “Mitigation Measures and Conservation Actions for Greater Sage-Grouse Habitat”, which includes BMPs for Fluid Mineral development.
DR-MTDK-BL-13-0413-22	Wildlife	While timing limitations may address direct impacts to winter range areas, surface disturbing activities could lead to degradation of the habitat. BLM should address both direct and indirect impacts to winter range and improve documentation of specific winter habitats in which to apply conservation measures.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS. note that a CSU (Controlled Surface Use) is also addressed on in the DRMP pages 2-76 & 77 for sage grouse winter range. The type of issues raised in your comment will be considered by the Billings Field Office during implementation of the Approved RMP when project-specific plans are prepared or evaluated.
DR-	Wildlife	Sage-grouse Restoration Areas that contain core areas should be subject to	n	Appendix AA (section F), page 13 addresses “Reclamation” for Fluid Minerals

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
MTDK-BL-13-0413-23		stronger conservation measures The BLM should provide more clarity about how specific management for the portion of the southern core area that has been identified as a restoration area will be addressed, including what will occur upon expiration or termination of leases.		development in Greater Sage-grouse habitat.
DR-MTDK-BL-13-0413-24	Wildlife	Active Lek buffers should be based on latest science In all sage-grouse areas where buffers are used, we agree with the state wildlife agencies that a buffer preventing energy development within 4 miles of active leks is preferred (unless greater protections are recommended in this document or new information indicates it should be greater) to protect as many nests as possible. All pump stations and other permanent structures should be placed a minimum of 2 miles (3.2 km) from the nearest lek, with a preferred distance of >4 miles (6.4 km) from active leks, based upon the best-available data from Naugle et al. (2011). Given that recent research Knick (2013) further underscores the low and underestimated tolerance for disturbance by sage-grouse, and as the body of research on these issues is still under development, we encourage the BLM to err on the side of caution in selecting adequate conservation measures for protection that will be followed for the next 15-20 years and be committed to amending management and permitting protocols as needed in the face of new information.	n	<p>BLM intends to rely on the latest knowledge and best available science by utilizing existing research. Before beginning the B&PPNM RMP/EIS and throughout the planning effort, the BLM and the Forest Service considered the availability of data from all sources, adequacy of existing data, data gaps, and the type of data necessary to support informed management decisions at the land-use plan level. The data needed to support broad-scale analysis of the Billings Field Office planning area are substantially different than the data needed to support site-specific analysis of projects. The RMP/EIS data and information is presented in map and table form and is sufficient to support the broad scale analyses required for land use planning.</p> <p>The BLM and the Forest Service used the most recent and best information available that was relevant to a land-use planning-level analysis including the Baseline Environmental Report (BER; Manier et al. 2013). The BER assisted the BLM and the Forest Service in summarizing the effect of their planning efforts at a range-wide scale, particularly in the affected environment and cumulative impacts sections. The BER looked at each of the threats to greater sage-grouse identified in the Fish and Wildlife Service’s “warranted but precluded” finding for the species. For these threats, the report summarized the current scientific understanding, as of report publication date (June 2013), of various impacts to greater sage-grouse populations and habitats. The report also quantitatively measured the location, magnitude, and extent of each threat. These data were used in the planning process to describe threats at other levels, such as the sub-regional boundary and WAFWA Management Zone scale, to facilitate comparison between sub-regions. The BER provided data and information to show how management under different alternatives may meet specific plans, goals, and objectives.</p> <p>Additionally, the BLM and the Forest Service consulted with, collected, and incorporated data from other agencies and sources, including but not limited to the U.S. Fish and Wildlife Service and Montana Fish, Wildlife and Parks.</p> <p>Other future research and data will be incorporated through the “Adaptive Management” approach described in Section 2.3.4, page 2-7.</p>
DR-MTDK-BL-13-0413-25	Renewable Energy	Renewable energy development should be minimized in sensitive areas In addition to oil and gas development, wind potential in the Eastern Region is very high. As previously noted, we believe development of wind energy can be compatible with wildlife if wind development occurs outside of sensitive areas. The science on wind energy impacts to sensitive species is under development	n	Thank you for your comment. We agree that development of wind energy can be compatible with wildlife in certain circumstances. Because of this, while renewable energy (both solar and wind development) is excluded on 78,088 acres, 331,088 acres have been designated as avoidance areas. BLM would generally not entertain proposals within avoidance areas, but under certain

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		(p. 4-273) and as it is improved conservation measures should reflect the science. Because greater sage-grouse avoid tall structures, special care should be taken to develop wind energy outside of identified core areas and all structures should be placed at least five miles from the nearest lek if the population is non-migratory (USFWS 2004 also cited p. 4-273).		<p>circumstances and dependent on the specific proposal, such development might be allowed with special stipulations and conservation measures, some which may be unknown at this time given continuing research and ever-changing renewable energy technologies. The preferred alternative considers only 5% of the BLM-administered land in the Billings Field Office (20,937 acres) as open based on anticipated limited resource concerns in those areas.</p> <p>The 2004 USFWS briefing paper cited on p. 4-273 was prepared in regard to studies conducted on the greater prairie chicken. Connelly et al. (2000) recommends a two mile buffer for sage-grouse. Rather than buffers, the preferred alternative designates sage grouse PHMAs as avoidance areas to be managed as described in the response above, regardless of the distance from an occupied lek.</p>
DR-MTDK-BL-13-0413-26	Wildlife	Fences should be removed, modified or marked in high-risk areas WWF commends the BLM for identifying the importance of fence removal or modification (p. 2-86). As noted, fencing can potentially impact wildlife species by fragmenting habitat or impeding migration among other alterations. Sage-grouse specific impacts include perching sites for predators and collision risk. We support the BLM actions common to all alternatives that new fences would allow for wildlife passage (except for fences built specifically to keep wildlife out of an area) and that fences would also be placed and marked, or modified, to reduce wildlife collisions or entanglements. The BLM should also consider removing fencing in priority areas and these actions should be implemented in all sage-grouse areas especially around leks.	n	Thank you for the comment. Please refer to Table 2-6.1, page 2-68, that states, "Fences identified as barriers to wildlife movement on BLM-administered lands would be modified or removed to accommodate wildlife passage." Also, please note that over 50 miles of fence marking within 1-2 miles of sage grouse leks has already been completed.
DR-MTDK-BL-13-0413-27	Wildlife	Actions to prevent West Nile virus should be required West Nile virus, which is linked to standing water associated with some forms of energy development and agricultural water development, also poses a threat to greater sage-grouse. Naugle et al. (2004) showed that up to 25% of a population may die due to West Nile virus. Although West Nile virus will impact sage-grouse populations (as well as humans and horses) in less developed areas, cumulative effects of West Nile virus occur in areas with high energy development. To reduce cumulative impacts, the BLM should prioritize limiting other impacts such as disturbance in areas with West Nile virus potential. The BLM produced an Information Bulletin (MT-2011-033) regarding best management practices to reduce the availability of breeding grounds for mosquitoes that carry West Nile virus. We recommend that these best management practices be implemented across BLM lands and particularly in sage-grouse core areas to prevent deaths. WWF has also produced, along with partners at the University of Wyoming, a spatially explicit map showing where West Nile virus is most likely to become prevalent under climate change conditions (Schrag et al. 2010). Areas with a high threat of West Nile virus should be prioritized for reduction of standing water and other factors	n	Thank you for your comment. The type of issues raised in your comment will be considered by the Billings Field Office during implementation of the Approved RMP when project-specific plans are prepared or evaluated. – several references to management of West Nile virus are included in Appendix AA(section F) and Table 2-6.1, page 2-69.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		that increase the likelihood of becoming Culex mosquito breeding grounds.		
DR-MTDK-BL-13-0413-28	Wildlife	Using the best-available data on the impact of threats to greater sage-grouse, we encourage the BLM to incorporate regulations and management practices that avoid threats in sage-grouse core areas and address impacts across the remaining sage-grouse habitat in this plan which will guide actions for the next 15-20 years. We also encourage the BLM to build on their strong stewardship and use the best available science to incorporate regulations and management practices that conserve the rich biological diversity which will also benefit the exceptional hunting, recreational, and cultural opportunities and the many other resource values of this region for current and future generations.	N	Thank you for your comment.
DR-MTDK-BL-13-0413-3	Wildlife	Although federal surface lands within the Billings District are scattered the planning area has been recognized for containing areas of high biodiversity in both a global and regional context. World Wildlife Fund (WWF) has identified the Northern Great Plains Ecoregion as one of the most biologically significant landscapes in the world. In 2004, along with partner organizations in the Northern Plains Conservation Network, WWF produced an ecoregional assessment for the NGP titled: Ocean of Grass: A Conservation Assessment for the Northern Great Plains (Forrest et al. 2004) and in 2012 an updated biodiversity assessment was released, the results of which are publicly available on an interactive web map (World Wildlife Fund 2012; Figure 1). In addition, an accompanying assessment (Schrag and Climb 2013) was produced to summarize key threats to biological diversity in the area. Both of these assessments identified that areas of the Billings District planning area contain high levels of biodiversity, mainly as a result of high numbers of sage-grouse, other grassland imperiled species, endemic species and intact lands. Other assessments have also identified parts of the region as having regionally important biodiversity (TNC 1999 and Audubon at http://mtaudubon.org/birds/sageiba.html ; Figure 1). Several Audubon Important Bird Areas (IBA) (as noted in the plan p. 3-86) are also located within the planning area. These include the Musselshell Sage-steppe IBA designated in 2007, which covers an expanse of sagebrush shrub-steppe and native prairie habitat on the western edge of the Great Plains. It supports a significant population of Greater Sage-Grouse in central Montana (http://netapp.audubon.org/IBA/Reports/3303). The Bridger Sage-steppe IBA is also within the planning area. It is dominated by sagebrush shrubs-steppe, with native grasslands on upper hillsides (http://mtaudubon.org/birds/documents/bridger.web.pdf). According to the IBA document, the Carbon Triangle area of this IBA encompasses significant habitat for Greater Sage-Grouse and supported the largest concentration of sage-grouse in the south-central portion of the state, at the time written, and roughly 3% of the male grouse surveyed in the state.	n	<p>Thank you for the comment. BLM intends to rely on the latest research and best available science by utilizing existing research and incorporating future research through the “Adaptive Management” approach described in Section 2.3.4, page 2-7. Also, some of the issues raised in your comment will be considered by the Billings Field Office during implementation of the Approved RMP when project-specific plans are prepared or evaluated through site specific NEPA analysis.</p> <p>BLM coordinates with other agencies, NGOs, and private interests to cooperatively improve management and share information to improve wildlife habitat management and biodiversity on all land ownerships. Thank you for the comment.</p> <p>The majority of the high biodiversity areas are protected through RMP actions for Sage grouse (PHMAs, RAs,) and other actions such as ACECs, Rangeland Health Standards – Standard 5= Biodiversity Standard, etc.)</p> <p>Important Bird Areas (IBAs) are area designated by the National Audubon Society. IBAs are sites that provide essential habitat for one or more species of bird. IBAs include sites for breeding, wintering, and/or migrating birds. There are four IBAs within the Billings Field Office Planning Area, three have public lands managed by BLM. Discussion of the IBAs is referenced on pages 3-86 and 3-99. One of the IBAs was nominated due to the presence of breeding populations of more than a dozen species on the Montana Priority Bird Species List. The foothill canyons in the area have the only known breeding location of blue-gray gnatcatchers in Montana (Audubon.org).</p> <p>Two of the IBAs nominated were identified to accentuate the management of these areas for the conservation of sage grouse and other sagebrush obligate species. Refer to: http://www.mtaudubon.org/birds/sageiba.html. Since Important Bird Areas are not a BLM designation, maps will not be included in the EIS. BLM protections that will protect the two sage grouse IBAs</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
				can be found in Chapter 2, Greater Sage-Grouse PHMA, RA, and GHMA, and Appendix C, and Appendix AA, AB. Executive Order 13186- Migratory Birds- is cited on page 2-68. The two IBAs are mostly within PHMAs Halfbreed NWR IBA – Managed by the USFWS and BLM has no management authority.
DR-MTDK-BL-13-0413-5	Climate	The Billings District should consider the importance of its actions in context of the greater landscape especially in relation to creating resiliency to climate change and ensuring connectivity to habitat outside of the planning area for species that require it. Managing at larger landscape scales is important because climate change is likely to cumulatively, with other human-induced stresses increase ecosystem vulnerability. Because of this, the Billings District should incorporate recommendations from large-scale regional planning and assessments such as the BLM's Rapid Ecological Assessments in the RMP revision as they become available.	N	Thank you for your comment. Status of the Northwestern Plains REA can be found at http://www.blm.gov/wo/st/en/prog/more/Landscape_Approach/reas/nwplains.html . The final RMP will be completed before the Northwestern Plains REA is complete.
DR-MTDK-BL-13-0413-6	Riparian/wetlands	Riparian and wetland areas are disproportionately important landscape elements to biological diversity. They are some of the rarest habitat types in North America and up to 80% of vertebrate species in the arid west use these habitats at some point in their life cycle. Therefore, they are of critical importance to conserve through public lands planning efforts (Krueper 2000). Numerous sensitive species in the planning area rely on riparian zones. Riparian vegetation is important to maintain aquatic resources, including fish, as well as water quantity and quality. WWF commends the BLM for identifying riparian areas for targeted recovery efforts. Because of the inordinate importance to biological diversity and over resource values, the BLM should prioritize adopting conservation measures, based on the best available science, that improve and protect riparian and wetland areas. Therefore, WWF supports the measures identified in Alternative B for these areas that provide the most intensive protection and restoration efforts as well as provide long-term beneficial impacts (p. 4-258). In addition, WWF supports using the best available science for establishing the buffer distance for key species, which is readily available (e.g. Ellis 2008).	n	Thank you for your comment. The BLM will be weighing the benefits of each alternative before making the final choice. Ultimately, the alternative chosen would represent the actions that best result in meeting resource objectives while allowing for multiple use of public lands.
DR-MTDK-BL-13-0413-7	Renewable energy	We believe development of wind energy can be compatible with wildlife if wind development occurs outside of sensitive areas. WWF, in partnership with The Nature Conservancy, recently developed maps of wind energy potential on previously disturbed lands in the five states encompassed by the Northern Great Plains Ecoregion (Montana, Wyoming, North Dakota, South Dakota, Nebraska; Fargione et al. 2011 and 2012). Wind potential on disturbed lands far exceeds the Department of Energy's goals in each of these states, allowing wind development to be focused outside of sensitive grasslands with little reduction in energy produced. Most of the areas identified through this study as Low Impact	n	Thank you for your comment. We have reviewed the referenced study of wind and wildlife in the Northern Great Plains prepared by Fargione et al. and appreciate the conclusions regarding wildlife sensitivity. The analysis conducted in the Billings RMP considered all resource values (not just wildlife and sensitive grasslands and habitats) to derive the open, avoidance, and exclusion areas delineated in the preferred alternative. The preferred alternative designates only 5% of the BLM-administered land in the Billings Field Office (20,937 acres) as open based on anticipated limited resource concerns in those areas.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		Areas with High Wind Development potential occur scattered throughout the area but mainly in the west (Figure 2). WWF supports the BLM's exclusion of wind energy from sage-grouse priority areas as well as for other sensitive species habitats and landscapes. WWF advocates for wind energy development on already disturbed lands that lie outside all greater sage-grouse core areas and exclusion from other areas that provide habitat for other sensitive species.		
DR-MTDK-BL-13-0413-8	Vegetation Invasive Species and Noxious Weeds	Invasive species are an increasing threat that impact multiple resource uses such as grazing, wildlife habitat, hunting and fishing as well as altering critical ecological processes. Native vegetative communities are generally associated with higher levels of species diversity. Noxious weeds are often correlated with surface-disturbing activities such as roads (p. 3-88). WWF commends the BLM for participation in Cooperative Weed Management Areas especially due to the fragmented nature of BLM lands. Because prevention is the best strategy for minimizing invasive species, and anthropogenic disturbance is highly associated with the introduction of noxious, and invasive species, the BLM should minimize surface-disturbing and disruptive activities (such as energy development or roads) in undisturbed habitats. In areas where surface disturbance occurs, we support of the use of native species in restoration as appropriate to the site (p. 2-65)	n	Thank you for your comment. Please refer to Chapter 2, Table 2-6.1, Page 2-62, pre-amble section "Vegetation: Invasive Species and Noxious Weeds" and "Desired Outcomes (Goals and Objectives)" discussions in the Draft RMP/EIS: "The BLM would control invasive, and non-native weed species and prevent the introduction of new invasive species, including aquatic nuisance species, by implementing a comprehensive weed program including: coordination with key partners, prevention and early detection, education, inventory and monitoring, and using the principles of Integrated Pest Management (IPM) and creating weed management areas (WMAs)". Project design features and mitigation measures, such as seed mix recommendations are developed at the site specific level, and as such are beyond the scope of this document. However, the application of native seed mixes as appropriate to the site, are always the preferred alternative.
DR-MTDK-BL-13-0413-9	Realty, Cadastral Survey, and Lands	Land consolidation would benefit a number of species where uniform management over large areas improve conservation outcomes. Fragmented ownership can be an impediment to minimizing conflicts and can make coordinated management at appropriate scales difficult. WWF supports BLM efforts to consolidate ownership while retaining and adding to critical habitat to enable more effective management for biodiversity.	n	Thank you for your comment. We agree that land consolidation can be a valuable tool in preserving and enhancing wildlife habitat. Land consolidation has always been a goal of BLM land exchanges and acquisitions and it will receive even more emphasis in the future particularly for the greater sage grouse and its habitat.
DR-MTDK-BL-13-0416-1	Oil and Gas	Montana-Dakota generates, transmits and distributes electricity and distributes natural gas in Montana. The company also owns and operates coal- and natural gas-fired electric generating facilities, as well as wind electric generation in Montana.	n	Thank you for your comment.
DR-MTDK-BL-13-0416-2	Realty, Cadastral Survey, and Lands	Since Montana-Dakota currently owns energy infrastructure on BLM lands in Montana and may propose to install new energy infrastructure and energy facilities within BLM lands in Montana, the restrictions in the Billings Draft RMP could impact the company's operations and potentially increase costs for customers. Montana-Dakota predominantly owns and operates gas distribution facilities in the Billings region, but will address projected impacts for both gas and electric distribution and electric transmission operations and facilities from the Billings Draft RMP in this comment letter.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS
DR-MTDK-BL-13-0416-3	Wildlife	At the outset, Montana-Dakota understands that the greater sage-grouse species has declined, that the USFWS will be issuing a final listing decision for greater sage-grouse under the Endangered and Threatened Species Act (ESA)	n	Thank you for your comment.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		<p>in the next couple years, and that states have been assigned the task of developing conservation measures for adequate protection of the species to avert a final listing decision under the ESA. Montana-Dakota appreciates the opportunity to comment on the Billings Draft RMP alternatives and has provided detailed comment below.</p>		
DR-MTDK-BL-13-0416-4	Wildlife	<p>Consolidation of Infrastructure Requirements. The BLM states that the Billings Draft RMP is to provide a comprehensive framework for land management of BLM administered lands, among consolidations of existing plans and management decisions, that are designed to balance uses with the protection of resources pursuant to Federal Land Policy and Management Act of 1976 and other applicable law. The BLM is including conservation measures for the greater sage-grouse in the Billings Draft RMP to assist in averting an ESA listing for sage-grouse. As BLM is aware, the State of Montana has formed a Greater Sage-grouse Advisory Council to develop conservation measures by January 2014 to be enacted into law for protection of the sage-grouse and its habitat in Montana. Montana-Dakota recommends the BLM not finalize its sage-grouse conservation measures until the agency can review what the State of Montana develops, and adopt the same conservation measures that the Montana Greater Sage-grouse Advisory Council finalizes in order to maintain as much consistency with requirements for electric and gas distribution and transmission line as possible. The Montana conservation measures are being developed for the same purpose as BLM, to provide adequate protection of the species and to avert a final listing decision from USFWS. Applying the same conservation measures will be much more efficient for industry to manage and implement.</p>	n	<p>Thank You for the comment. BLM intends to rely on the latest research and best available science by utilizing existing research and the Governor's Sage Grouse Advisory Council recommendations, incorporating the "USGS Range-Wide genetic Connectivity of Greater Sage-Grouse Populations" study when it is complete, and incorporating other future research through the "Adaptive Management" approach described in Section 2.3.4, page 2-7. Before beginning the B&PPNM RMP/EIS and throughout the planning effort, the BLM and the Forest Service considered the availability of data from all sources, adequacy of existing data, data gaps, and the type of data necessary to support informed management decisions at the land-use plan level. The data needed to support broad-scale analysis of the Billings Field Office planning area are substantially different than the data needed to support site-specific analysis of projects. The RMP/EIS data and information is presented in map and table form and is sufficient to support the broad scale analyses required for land use planning. The BLM and the Forest Service used the most recent and best information available that was relevant to a land-use planning-level analysis including the Baseline Environmental Report (BER; Manier et al. 2013). The BER assisted the BLM and the Forest Service in summarizing the effect of their planning efforts at a range-wide scale, particularly in the affected environment and cumulative impacts sections. The BER looked at each of the threats to greater sage-grouse identified in the Fish and Wildlife Service's "warranted but precluded" finding for the species. For these threats, the report summarized the current scientific understanding, as of report publication date (June 2013), of various impacts to greater sage-grouse populations and habitats. The report also quantitatively measured the location, magnitude, and extent of each threat. These data were used in the planning process to describe threats at other levels, such as the sub-regional boundary and WAFWA Management Zone scale, to facilitate comparison between sub-regions. The BER provided data and information to show how management under different alternatives may meet specific plans, goals, and objectives. Additionally, the BLM and the Forest Service consulted with, collected, and incorporated data from other agencies and sources, including but not limited to the U.S. Fish and Wildlife Service and Montana Fish, Wildlife and Parks.</p>
DR-MTDK-BL-13-0416-5	Wildlife	<p>Consideration of Recent Scientific Studies Montana-Dakota is concerned that the BLM did not review scientific literature that has found lesser impacts from power lines on sage grouse than some have believed. Consequently, there is</p>	N	<p>Thank you for your comment. - sage grouse transmission lines and guidance with LeBeau USGS report. BLM intends to rely on the latest research and best available science by</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		concern with the preferred alternative which includes stringent conservation measures that appear to be based more on modeling of theories rather than scientifically rigorous and peer-reviewed research. Montana-Dakota recommends the BLM adopt the conservation measures being developed by the Montana Greater Sagegrouse Advisory Council, or consider applying the sage-grouse BMPs that are being developed together between APLIC and wildlife agencies to serve as appropriate conservation measures for sage-grouse issues related to electric utility facilities.		utilizing existing research and delaying final decisions until the Governor's Sage Grouse Advisory Council recommendations are final, incorporating the "USGS Range-Wide genetic Connectivity of Greater Sage-Grouse Populations" study when it is complete, and incorporating appropriate recommendations into the Final RMP. Other future research, such as recent APLIC guidelines, will be considered through the "Adaptive Management" approach described in Section 2.3.4, page 2-7.
DR-MTDK-BL-13-0416-6	Wildlife	Restoration Area Conservation Measures Montana-Dakota recommends that the BLM not require the removal or undergrounding of electric distribution or transmission lines for restoration considerations in priority conservation areas or in areas proposed for restoration due to the significant cost for underground installation and the cost and complexity involved with establishing a new route for this infrastructure. It is recommended that the BLM work with utilities on a case-by-case basis to address potential impacts or concerns from this infrastructure to sage-grouse in areas identified for restoration and consider BMPs other than removal or undergrounding. Montana-Dakota believes this approach is appropriate since electric transmission and distribution line infrastructure has a small footprint and has not resulted in significant direct displacement of sagebrush habitat.	n	Refer to page AB-6 for Power-line mitigation and conservation measures for greater sage-grouse. Other measures will definitely be considered prior to considering removal or undergrounding. For example: "Determine by cooperative action- agencies, utilities, and landowners- whether or not modification of poles to limit perching will prevent electrocution of raptors and decrease predation on sage-grouse. Emphasize the following if perch prevention modifications do not work to protect sage-grouse and sage-brush habitat: o reroute the line using distance, topography, or vegetative cover; or o bury the line. Remove power lines that traverse important sage-grouse habitats when facilities being serviced are no longer in use or when projects are complete."
DR-MTDK-BL-13-0416-7	Realty, Cadastral Survey, and Lands	Existing Leases Existing leases for electric and gas distribution and transmission that are currently located in priority areas of conservation as well as areas identified for restoration, should be allowed to be renewed due to the potential impact any lease expiration would have by requiring a costly reroute of existing gas or electric lines, substations, and gas border stations and may not necessarily achieve greater protection for sage-grouse. Existing surface occupancy of facilities should be allowed due to the cost of relocating facilities. Montana-Dakota believes BLM and utilities can work together on rebuilding projects and develop conservation measures if necessary on a case-by-case basis.	n	Thank you for your comment. The ROW avoidance and exclusion areas proposed by alternative are for new rights-of-way. The document states "ROW exclusion or avoidance areas would be subject to valid existing rights." The Billings Field Office RMP will continue to respect the rights and investments of utility companies crossing over or under public lands with authorized by rights-of-way. Existing rights-of-way located within priority greater sage grouse habitat will receive additional monitoring by BLM personnel, but will not be required to re-build. The most likely mitigation for a right-of-way renewal of an overhead electric powerline would be the installation of anti-perching devices and bringing powerlines up to the existing standards required Avian Powerline Interaction Committee (APIC). In the case of pipeline rights-of-way there may be modifications to vegetation mowing within the boundaries of the grant. For new rights-of-way there will be increased environmental review and an emphasis on avoiding sage grouse priority habitat.
DR-MTDK-BL-13-0416-8	Wildlife	The two quotes shown below are from the USGS report and are not considered accurate when reading the actual text from the references and we recommend BLM conduct separate review of this literature to ensure the determinations in	n	Thank you for the comment. We agree that quality of brood-rearing habitat will influence habitat selection. The literature will be reviewed prior to the Final RMP/EIS.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		<p>references are applied properly in consideration of sage-grouse conservation measures. "Sage-grouse avoided brood-rearing habitats within 2.9 mi (4.7 km) of transmission lines in south-central Wyoming (LeBeau, 2012). ""Power line collisions accounted for 33 percent of juvenile (1st winter) mortality in low-elevation areas in Idaho (Beck and others, 2006)". Regarding the statement above from the LeBeau 2012 report, the USGS does not include how LeBeau characterizes the proximity to transmission lines and should consider this additional statement from that reference: "Specifically, sage-grouse within SMH selected for brood-rearing habitats farther away from transmission lines. However, much of the habitat surrounding the transmission lines located within the SMH study area was mostly comprised of a greater percent bare ground, which is not characteristic of sage-grouse brood rearing habitats (Connelly et al. 2000, Aldridge and Boyce 2007) and percent bare ground was represented as a negative effect in the top brood-rearing selection model (i.e. , odds of selection increased in habitats with less bare ground). ..</p>		<p>BLM intends to rely on the latest research and best available science by utilizing existing research and incorporating other future research through the "Adaptive Management" approach described in Section 2.3.4, page 2-7.</p>
DR-MTDK-BL-13-0417-1	WILD HORSES, PMWHR	<p>Here in N.C. the wild horses on barrier Islands are protected by different local care takers of each remaining wild herds ! The Shackelford Wild Mustangs who now have Presidential Protection signed by Bill Clinton are cared for by the N.P.S. (who once wanted to kill them all) but now share their management with the " Shackelford Foundation Inc. " which both are over seen and watched by " Friends of The Shackelford Wild Mustangs " Founded by Elizabeth Loftin , Hidede Bowl, Tony Seamon, and Ms. Dot Walter Willis ! In Chincoteague N.C. the wild horses are protected by the local people and the FIRE DEPT. ! There are many trust worthy advocates to share management and look over the care of these majestic beauties ! Mustang Meg !!! " Sonya " comes first to my mind and Trust Worthiness. Thank-you for considering my solution to a long ongoing problem ! Our State Congressmen, Senators, legislators, C.A.M.A. and the President of the United States....all agreed with me in 1993 to 1999 in our long drawn out battle ! Since the Presidential Protection Wild Horse Act was put into place for our wild horses. The Shackelford Horses are not our State Horse ! And the N.P.S. has worked alongside of the Shackelford Foundation ! There has been no more killings !</p>	N	<p>Thank you for your comment</p>
DR-MTDK-BL-13-0418-1	WILD HORSES, PMWHR	<p>Please stop these barbaric roundups of the mustangs. These herds have roamed our plains for years and aren't hurting anything.</p>	N	<p>Thank you for your comment. This document is not tied to any gather as gathers are implementation level documents.</p>
DR-MTDK-BL-13-0422-1	Wildlife	<p>Concerning the Sage Grouse issue, please refer to the study Landscape-Scale Factors Affecting Population Dynamics of Greater Sage-Grouse in North-Central Montana, 2001-2004 written by Brendan James Moynahan. The study goes into detail on many interesting points, including the fact that the main cause of nest failure was that of predators. This three year study does not seem to have been used as a resource during the creation of the plans.</p>	n	<p>Thank you for your comment. It is also stated that, "Management of habitats for nesting sage-grouse should focus on increasing grass cover to increase survival of first nests and contribute to favorable conditions for re-nesting, which should be less likely if survival of first nests increases. "Factors Affecting Nest Survival of Greater Sage-Grouse in Northcentral Montana" Moynahan, Brendan J., et al. Univ. of Mt., Missoula, Mt.</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
				,Journal of Wildlife Management, Volume 71, Issue 6, Dec.13, 2010.
DR-MTDK-BL-13-0422-2	Social/econ	You have not address the commutative and County economic impact this plan will have to the people of Montana. We believe depending on the travel plan and the commercial restriction you Will come forward with. We believe this plan could cost everyone mention above could shut down hunting ,commercial enterprise and tourism Dollars coming into the state. You have not address impact in Detail Schools gas station hotels and eating sporting good and equipment like ATVS and SUVs and housing market the growth in these area and tax revenues that would be losses that would have been generated from the proposed changes!	n	The analysis addresses the economic consequences of recreation on pg. 4-605 of the DEIS. None of the alternatives are expected to decrease revenue, employment, or income associated with visitors to public lands in the Field Office area.
DR-MTDK-BL-13-0422-3	Travel mngt	CW 2080 needs to be open for full size 4x4 UTV and all motorized travel. Without what we call the switch backs which is a key connection route to the other side of the FS. This road connects north side with south side and it provides a Moab experience. Otherwise would take additional 2 hrs to get around and back up the mountain	n	Thank you for your comments. The route has been reviewed by BLM staff and the decision has been altered to classify the route CW 2080 as being "open with additional management".
DR-MTDK-BL-13-0422-4	WSR	wild and scenic rivers on crooked creek do not belong. The road runs along the creek and it is not a river and not wild. When we have water on the road it runs directly in to the creek. You would be able to hear the traffic and see them on the corners so this needs to be taken out. Also Bad Canyon Creek is also in there and it is a creek not a river and it dry up in the summer time in area. There is fence and manmade structure close by and Cattle graze in the creek area! There is mineral in the area and good Grazing.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses of text revisions under NEPA regulations, they have been considered in the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS. In regards to your specific comment on Wild and Scenic Rivers, the process and criteria for identifying, evaluating and designating wild and scenic rivers was set by the Wild and Scenic River Act (P.L. 90-542, as amended) and the federal land management agencies can only follow that direction. Please refer to that Act for guidance.
DR-MTDK-BL-13-0422-5	Travel mngt	Weather man draw and Cotton Wood move to open riding Area and maps provided. Need to be open riding area for Motorcycles and make a Moab experience for Motorize full size and UTV and ATVs!	n	In regards to your comment, the RMP has a range of possible decisions to make. In this case, the Alternative D decision is for Weatherman Draw to remain as "Limited". The reason is that FLPMA instructs the BLM to give priority to designation and protective management of ACECs and their Resources. Recreational opportunities and experiences are not the primary consideration in an ACEC. Please see FLPA Section 102 (8) and Section 201(a) and Section 202 (c.3)
DR-MTDK-BL-13-0422-6	Travel mngt	we are asking for looping connecting trail and roads in this area GD1105. Also GD1011 need to be open as with the closer of this road would not let you to have access the State land and put you out over a mile from the state lands for hunting bird and big game retrieval! Also we would like GD1820 where it ends and make a Moab trail to connect to GD1018 for extreme 4x4 Access Road not maintain inter at your own risk. Same signage they use in Moab. This would give	n	Thank you for your comment. BLM has no route identified as "GD 1105" or a "GD 1820" on its route inventory and cannot respond to these observations. However BLM staff believes that the routes in question may possibly be "GD 1005", and "GD 1020". In response, GD 1020 does not connect to GD 1018. If these are the routes in question, the proposed action of extending the routes can be addressed at the

*Billings and Pompeys Pillar National Monument
Proposed Resource Management Plan and Final Environmental Impact Statement*

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		a different area experience since it not a long ways from horse thief. We have the same opportunities to connect to and make loops in the area GD1013 and GD1012!		time of the TMA Implementation Plan. Connecting loops between GD 1013 and GD 1012 and GD 1005 would be an implementation level action as well since both routes cross into private property and appear to require easements and/or new construction.
DR-MTDK-BL-13-0424-1	Travel mngt	Desire for greater flexibility of Recreational Management Area (RMA) Designations to allow future development of full-size OHV recreational opportunities--specifically in the Acton Recreational Area and Pryor Mountain Areas.	n	Thank you for your comment. The BLM will develop site specific Implementation Plans for areas designated as Recreation Management Areas, (including both mentioned Acton and Pryor Mountain SRMAs) as well as retaining the ability to designate, or eliminate, specific routes anywhere in the FO.
DR-MTDK-BL-13-0425-1	NEPA	Of interest to MLR in the BLM's draft RMP revision is the way in which BLM will construct lease stipulations for oil and gas leases on split estate properties that have entered into a perpetual conservation easement with MLR. In those counties where BLM resources are governed under RMP, MLR holds 120 separate conservation easements that represent over 190,000 acres and 325 miles of stream frontage. Further, the majority of those easements are found in the Stillwater and East and West Rosebud drainages that have been identified by agency analysis as seeing "moderate potential" for oil and gas development. Particularly in these areas, many of the landowners have entered into private conservation easements, yet they operate on "split estate" ownership. Certainly, this can create some conflict between resource development and the conservation values. stated in each conservation easement on split properties. The BLM has clear authority to condition leases to protect conservation values found in conservation easements. As stated in the RMP revision DEIS: In summary, while the BLM does not have the legal authority in split estate situations to regulate how a surface owner manages his or her property, the agency does have the statutory authority to take reasonable measures to avoid or minimize adverse environmental impacts that may result from federally authorized mineral lease activity. (DEIS, Appendix G) Moreover, the Mineral Leasing Act specifies that "The Secretary of Interior, or for the National Forest lands, the Secretary of Agriculture, shall regulate all surface-disturbing activities conducted pursuant to any lease [including split estate] issued under this chapter, and shall determine reclamation and other actions as required in the interest of conservation of the surface resources." 30 U.S.C. § 226(g), 1988 To address the issue, given the amount of private land conservation in the planning area as well as the emergence of drilling technology and its ability to recover resources while protecting conservation easement properties, MLR requests the BLM implement one or both of the following: 1) The BLM include a stipulation to prevent impacts to split estate conservation easement properties. This could be facilitated via a no surface occupancy stipulation that precludes development on easement properties, similar to the protections provided in the draft RMP on split estate ownership with state-owned surface. Finally, the BLM could implement a	n	Thank you for your comment. Your suggestions will be considered.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		controlled surface use stipulation that requires development to be compatible with the terms of the conservation easement. Under this stipulation the lessee and the land trust must develop and sign off on a mutually agreeable surface use plan before development may occur. 2) The BLM conduct an impacts analysis on split estate conservation easement properties. This analysis should identify where these lands are located and what the effects of BLM authorized activities would be to these lands. MLR would be happy to provide maps of all easements in the area that could potentially be impacted.		
DR-MTDK-BL-13-0426-1	Edits	The structure of Billings/Pompey's Pillar DEIS makes it extremely difficult for reviewers to track BLM's proposed management options because they are inconsistent among chapters while at the same time spread out among the various chapter sections in piecemeal fashion. Even the basic descriptions of the alternatives and their priorities are missing. One is forced to wade through countless pages of resource descriptions for each alternative in separate sections, forcing the reader to jump from one section to another to understand the proposed management. Moreover, the Joint Association Comments on Billings/Pompey's Pillar DEIS/RMP pervasive inconsistencies throughout the documents make it impossible for reviewers to comprehend the changes in resource uses and management proposed by BLM under each alternative. We strongly recommend that BLM adopt a revised format for subsequent planning documents that provides resource and decision-related information in an easy to follow, consistent format	n	Thank you for your comment.
DR-MTDK-BL-13-0426-10	NEPA	BLM has failed to explicitly describe the process of Adaptive Management it intends to use. While industry supports the goal of adaptive management, it will not be successful without the development of science-based monitoring protocols to assess and validate the effectiveness of federal land management actions, particularly with respect to regulating oil and gas development, such as lease stipulations and conditions of approval (COA) and to adjust management decisions in response to this monitoring. We recognize that adaptive management, if done properly, can assist land managers through monitoring to validate whether the assumptions underlying mitigation measures are met and allow needed modifications to be made accordingly. BLM needs to clearly articulate its adaptive management policies in the planning documents. Simply referencing that it may be used is inadequate	y/n	Thank you for your comment. Please see Section 2.3.4 of this document and the glossary for a definition of adaptive management for a further explanation of adaptive management.
DR-MTDK-BL-13-0426-11	NEPA	The DEIS fails to clearly identify the management goals and objectives for each alternative. While Table 2-6 describes the proposed actions under each alternative and Table 2-7 identifies the purported environmental consequences by alternative, the reader is left to guess BLM's what the overall objectives are for each alternative. This omission needs to be addressed when preparing the revised draft planning documents	N	Thank you for your comment.
DR-	Wildlife	The basis for BLM's highly restrictive management approach appears to be	N	Thank you for your comment. The requisite level of information necessary to

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
MTDK-BL-13-0426-12		<p>predicated upon the need to protect the Greater Sage-grouse. Unfortunately, BLM has relied upon scientific data which is flawed for a number of reasons, not the least of which is the inappropriate reliance upon general scientific conventions based upon male lek attendance, but also because it is too general to be extrapolated to the planning area, and because it is based upon development scenarios that are unlikely to occur within Montana. Moreover, recent findings scheduled for publication in the near future irrefutably demonstrate that sage-grouse are not extirpated by oil and gas activities and that with reasonable mitigation measures, such as limited NSO perimeters around active leks along with other reasonable mitigation as well as interim and final reclamation procedures, sage-grouse return to previously disturbed areas</p>		<p>make a reasoned choice among the alternatives in an EIS is based on the scope and nature of the proposed decisions. As the EIS analyzes land use planning-level decisions, which by their nature are broad in scope, the requisite level of data and information is more generalized in order to apply to a wide-ranging landscape perspective. Although the BLM realizes that more data, and more site specific data, could always be gathered, the baseline data utilized in the EIS provide the necessary basis to make informed land use plan-level decisions.</p> <p>The BLM considered the availability of data from all sources, adequacy of existing data, data gaps, and the type of data necessary to support informed management decisions at the land-use plan level. The data needed to support broad-scale analysis of the BLM Billings planning area are substantially different than the data needed to support site-specific analysis of projects. The RMP/EIS data and information is presented in map and table form and is sufficient to support the broad scale analyses required for land use planning.</p> <p>Additionally, the BLM used the most recent and best information available that was relevant to a land-use planning-level analysis including the Baseline Environmental Report ([BER]; Manier et al. 2013). The BER assisted the BLM in summarizing the effect of their planning efforts at a range-wide scale, particularly in the affected environment and cumulative impacts sections. The BER looked at each of the threats to greater sage-grouse identified in the Fish and Wildlife Service’s “warranted but precluded” finding for the species. For these threats, the report summarized the current scientific understanding, as of the BER’s publication date (June 2013), of various impacts to greater sage-grouse populations and habitats. The report also quantitatively measured the location, magnitude, and extent of each threat. These data were used in the planning process to describe threats at other levels, such as the sub-regional boundary and WAFWA Management Zone scale, to facilitate comparison between sub-regions. The BER provided data and information to show how management under different alternatives may meet specific plans, goals, and objectives.</p> <p>The BLM consulted with, collected, and incorporated data from other agencies and sources, including but not limited to the U.S. Fish and Wildlife Service, and the Montana Fish, Wildlife and Parks. Additional information provided by state and local governments regarding socioeconomics also support the analysis in Chapter 4.</p> <p>As a result of these actions, the BLM gathered the necessary data essential to</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
				<p>make a reasoned choice among the alternatives analyzed in detail in the Draft RMP/EIS, and provided an adequate analysis that led to disclosure of the potential environmental consequences of the alternatives (see Chapter 4, Environmental Consequences and Cumulative Effects). As a result, the BLM has taken a “hard look,” as required by the NEPA (see 40 CFR 1502.16), at the environmental consequences of the alternatives in the Draft RMP/EIS to enable the decision maker to make an informed decision.</p> <p>As noted in more detail in responses to issue statements identified elsewhere in the report, the BLM has complied with the myriad applicable laws, policies, and guidance in developing the RMP/EIS. Section 2.2, Developing the Range of Alternatives, of the RMP/EIS, states that all alternatives would comply with state and federal laws, regulations, policies, and standards, and implement actions originating from laws, regulations, and policies. Additionally, in Section 1.4.2, Planning Criteria, of the Draft RMP/EIS, the BLM has a criterion stating that all alternatives would comply with existing laws, regulations, and policies. The BLM has reviewed all actions in the Proposed RMP/Final EIS and found them to be consistent and within the bounds of all required laws, regulations, and policies. Further details regarding BLM compliance with state, county, and local plans and policies can be found in Section 1.5, Consistency with Other State, County, or Local Plans, of this report. A land use planning-level decision is broad in scope and, therefore, does not require an exhaustive gathering and monitoring of baseline data. Although the BLM and the Forest Service realize that more data could always be gathered, the baseline data provides the necessary basis to make informed land use plan-level decisions. Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions (BLM Land Use Planning Handbook H-1601-1, Chapter II, A-B at 11-13 and Chapter IV, B at 29; Forest Service Handbook 1909.12 – Land Management Planning). The BLM and the Forest Service will conduct subsequent project-specific NEPA analyses for projects proposed for implementation under the land use plan, which may include but are not limited to fuels treatment, habitat restoration, [etc.]; list others as applicable]. The subsequent NEPA analyses for project-specific actions will tier to the land-use planning analysis and evaluate project impacts at the appropriate site-specific level (40 CFR 1502.20, 40 CFR 1508.28). As required by NEPA, the public will have the opportunity to participate in the NEPA process for site-specific actions.</p>
DR-MTDK-BL-13-0426-13	NEPA	The DEIS fails to provide any information or documentation regarding the purported inadequacies of current management of the BFO. We recognize that the RMP needs to be revisited on a somewhat regular schedule. However, all proposed changes need to be clearly articulated in the planning DEIS to illustrate why any changes may be necessary. BLM has not explained why	N	Thank you for your comment. Please see Chapter 1, Section 1.2.2 Need for Revising the Existing Plan, Section 1.3 Planning Process, and Section 1.4.1 Planning Issues. Since the Record of Decision was signed for the existing RMP in 1984, new data have become available, and laws, regulations, and policies regarding management of these public lands have changed. In

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		certain changes in management have been proposed and no information supporting such changes is provided in the DEIS		addition, decisions in the existing plan do not satisfactorily address all new and emerging issues in the Planning Area. These changes and potential deficiencies created the need to revise the existing plan.
DR-MTDK-BL-13-0426-14	Air	BLM chose to analyze the PSD increments, which are the amount of pollution an area is allowed to increase. It is also important to note that PSD increment analysis does NOT apply in this scenario. This analysis is wholly inappropriate and is being misused. On page 4-16, BLM attempts to make a clarification to this analysis by stating, "The following PSD analysis is not a regulatory analysis; its purpose is to provide context for evaluating potential air quality impacts." However, what is the purpose of attempting to provide "context" when the context being provided is inaccurate and inappropriate? While the numbers documented in the DEIS show exceedances of PSD increments, this type of analysis is inappropriate for even evaluating air quality impacts. Therefore, we recommend it be removed from the document. We also point out that air quality management falls within the jurisdiction of the MDEQ, not BLM, making it only MDEQ's responsibility to implement the PSD permitting program for major sources. It is irresponsible for BLM to apply its flawed analysis on a wide scale using conservative estimates in an attempt to frighten the public into believing these could be real impacts. It is crucial for BLM to modify its approach in the revised planning documents	n	As stated in Section 4.1.1.3.1, the PSD increment analysis is not a regulatory analysis and is presented only to provide context.
DR-MTDK-BL-13-0426-16	Air	We acknowledge that it is reasonable to expect additional sources by 2015. However, any emissions estimates must take into account the amount of electrification occurring. Additionally, gas sales on the upstream side of industry are expected to increase significantly as pipeline availability increases. For example, within the last year industry has electrified hundreds of oil and gas wells and, as a result, no longer has natural gas lifting engines or gasoline-fired recycle pump engines. Furthermore, more gas is being sold from sites as the natural gas pipeline/processing infrastructure has been expanding, thus BLM's "actual" flaring data is NOT representative and are, therefore, unacceptable for use in extrapolating for future predictions. The DEIS also failed to take into account the reduction in emissions associated with the New Source Performance Standards (NSPS) 1 and the National Emission Standards for Hazardous Air Pollutants (NESHAP) 1 also known as Maximum Achievable Control Technology (MACT) standards. Implementation of these regulations will also reduce emissions in the planning area. This lack of attention to these rules leads to apprehension regarding BLM's commitment to accurately estimate emissions, and thus ambient impacts	y	Emission inventories were updated to address recent EPA regulations, including the NSPS and NESHAPs and are provided in Sections 4.1.2.3–4.1.2.6 and in the Air Resource Technical Support Document and Appendix Y. Without commenter submission of specific data concerning electrification and/or the pace of infrastructure build-out relative to oil and gas development growth, the BLM conservatively estimated emissions based on current practices coupled with regulatory requirements.
DR-MTDK-BL-13-0426-17	Air	We are disturbed that BLM has not defined "good" air quality or what "unacceptable impacts" would entail. As such, it is impossible to provide comments in any meaningful fashion when these terms are undefined and the information used to make these decisions has not and, apparently, will not be	n	"Good" air quality summarizes the monitoring data provided in Section 3.2.1.3, which show that air pollutant concentrations are well below the NAAQS. An example of an unacceptable impact includes a violation of the NAAQS or an air pollutant concentration trend showing the potential for a future violation of the

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		publically vetted		NAAQS.
DR-MTDK-BL-13-0426-18	NEPA, Wildlife, oil and gas	The DEIS fails to provide sufficient discussion, documentation or justification for the proposed prohibitions of ROW on immense portions of the planning area. This information is a key requirement of NEPA and its omission constitutes a significant flaw in the analysis because it fails to consider the impacts such a decision would have on future oil and gas development, transportation, along with other activities which require ROW. Moreover, the statement that habitat loss can result from pipelines obviously fails to take into account that pipeline construction is a temporary impact and that all surface disturbance is fully reclaimed to BLM standards	N	Thank you for your comment. The BLM is required to manage the public lands on the basis of multiple use and sustained yield and to meet the needs of present and future generations. As the human population continues to increase and social values evolve, resource conflicts are likely to increase. More importantly, the American public is increasingly aware of the importance of the public lands to its well-being and is demanding a larger voice in resource management decisions (H-1601-1). Land use plans ensure that the public lands are managed in accordance with the intent of Congress as stated in FLPMA (43 U.S.C. 1701 et seq.), under the principles of multiple use and sustained yield. As required by FLPMA and BLM policy, the public lands must be managed in a manner that protects the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archaeological values; that, where appropriate, will preserve and protect certain public lands in their natural condition; that will provide food and habitat for fish and wildlife and domestic animals; that will provide for outdoor recreation and human occupancy and use; and that recognizes the Nation's need for domestic sources of minerals, food, timber, and fiber from the public lands by encouraging collaboration and public participation throughout the planning process. Land use plans are one of the primary mechanisms for guiding BLM activities to achieve the mission and goals outlined in the Department of the Interior (DOI) Strategic Plan. (H-1601-1) The ROW avoidance and exclusion areas have been proposed to prevent / avoid impacts tovarious resources. With regards to surface disturbance, disturbed areas may be reclaimed to BLM standards, but it can take sagebrush ecosystems 30 to well over 100 years to fully recover (Eichorn and Watts 1984, Baker 2007, Lesica et al. 2005), hence the need for ROW avoidance or exclusion areas.
DR-MTDK-BL-13-0426-19	Soils	The DEIS fails to provide documentation of any justification for the proposed increase in restrictions on slopes. For example, has it been documented that current activities have resulted in adverse impacts which would justify this change? If BLM has no evidence demonstrating that current measures are not successful, the proposed change is unwarranted and must be eliminated	n	Thank you for your comment. Text has been changed in Chapter 2 to address consistency between BLM MT/DK O&G stipulations
DR-MTDK-BL-13-0426-2	NEPA	Absent a sufficient and consistent description of the potential environmental impacts associated with each alternative directly pertaining to the Billings planning area, BLM has failed to meet both of the "twin purposes" of NEPA, understanding potential impacts and public disclosure of said impacts. See Baltimore Gas & Electric v. Natural Resources Defense Council, 462 U.S. 87, 97 (1983). For this reason alone, the BLM must prepare a revised draft environmental impact statement. 40 C.F.R. § 1502.9(a)	N	Thank you for your comment.
DR-	Water	Page 4-89, 4.2.5.4.2, Impacts from Water -" "Fluid mineral development	n	Unfortunately, even with stipulations and BMPs designed to avoid adverse

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
MTDK-BL-13-0426-20		generally impacts water resources by increasing NPS, including increased erosion and sedimentation from surface disturbance and unnatural drainage patterns associated with roads. "COMMENT: This statement is provocative and ignores that existing stipulations and practices already require full protection of water resources. In fact, the DEIS describes BMPs to be utilized to avoid these very impacts in Appendix B, which specifically outlines Erosion and Sediment Control Practices, along with a host of other measures, designed to protect all aspects of water quality. Therefore, this statement is inappropriate because it fails to acknowledge the routine use of stipulations and other site-specific mitigation measures along with site-specific BMPs		impacts to water quality from various sources of development pollution, design, construction, and implementation flaws sometimes occur that allow for impacts to water resources. Catastrophic weather events could also cause a failure of a perfectly constructed mitigation measure. The statement is not meant to be provocative, it only is meant to indicate that fluid mineral development does have the potential to impact water quality. The statement is not saying fluid mineral development 'will have' these impacts, the statement is saying, "if there is an impact, it is likely to be "by increasing NPS, including increased erosion and sedimentation from surface disturbance and unnatural drainage patterns associated with roads."
DR-MTDK-BL-13-0426-21	Paleontology	The DEIS fails to specify what constitutes a "Recorded Paleontological Site" that would require an NSO stipulation. For instance, would this stipulation apply to known sites that do not contain vertebrate fossils, or non-vertebrate/plant remains that are common and of lower scientific interest? More specificity is needed to accurately assess this NSO requirement	n	Thank you for your comment. Text will be revised to define "known or recorded paleontological site" Also, Please see the definitions in the potential fossil yield classification – chapter 3 – 3.11.2.4
DR-MTDK-BL-13-0426-22	Wildlife	In many instances, the species habitat delineations in the DEIS are inconsistent with those identified by the Montana Department of Fish, Wildlife & Parks (FWP). We ask BLM to explain these discrepancies in a revised planning document, particularly due to the fact that the State manages most of the species for which habitat is identified. Such discrepancies are highly problematic for operators who work on both State and private lands that may be adjacent to public lands because two separate processes could be required for the same project if it crosses jurisdictional boundaries. We strongly recommend that BLM work closely with State agencies to eliminate the discrepancies in wildlife data and spatial representations utilized by BLM in the draft planning documents	n	Thank you for the comment. Several species maps were derived from MTFWP maps. Updated maps from the original maps may be added in the Final RMP/EIS.
DR-MTDK-BL-13-0426-23	Wildlife	While the NSO, CSU, and TLS for fish and wildlife species may have been aggregated in maps regarding oil and gas "leasing standard stipulations" and "major moderate constraints," BLM failed to separately map the habitat areas with associated management restrictions for all species' habitat for which lease stipulations be imposed. In other BLM RMPs, it is routine to map habitat areas that may or may not include restrictions and management prescriptions separately from maps that illustrate the overall restrictions on future fluid mineral leasing. We recommend that BLM provide individual maps depicting each of the various habitats, along with associated land-use restrictions and special management areas, for all species that are discussed in the DEIS	n	Thank you for the comment. Individual species maps are compiled on Maps 50-57 that identify Fluid Minerals Standard Lease Terms and Major/Moderate Constraints, the individual species maps are not included.
DR-MTDK-BL-13-0426-	Wildlife	BLM has failed to justify or provide any scientific documentation supporting the management restrictions for the black-tailed and white-tailed prairie dogs in the DEIS, particularly the NSO stipulation within 1/4 mile of habitat. These	n	thank you for your comment.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
24		stipulations do not correspond with the U.S. Fish and Wildlife Service's (FWS) recent listing determinations for the species and its conclusions about the impact of oil and gas development on their habitat		
DR-MTDK-BL-13-0426-25	Wildlife	BLM has failed to establish why a colony is considered to be "active" if it has been used in the past ten years. Without a clear explanation for the ten year "active" definition, this restriction is unreasonable and arbitrary. For example, if a colony was used nine and half years prior to a proposed surface disturbance and has not been used since, it is reasonable to assume that the nest either has been abandoned or no longer contains the resource values to attract prairie dogs. Yet it will still be considered "active" by BLM and would trigger the stipulations and restrictions identified in Chapter 2, even though the area may never have an "active" colony again. BLM has not identified which colonies within the planning area have been active within the past ten years. In order to demonstrate that habitat can be maintained so that prairie dogs are not precluded from using colonies, operators must have a clear understanding of the location of active colonies and adequate justification that they have been in fact active sometime in the recent past. BLM needs to provide maps which identify active and inactive colonies in the revised DEIS.	n	thank you for your comment.
DR-MTDK-BL-13-0426-26	Wildlife	In addition, the language in Chapter 2 regarding the definition of "active" prairie dog colonies is inconsistent with Appendix C, which states that "Prairie dog habitat is defined as the maximum extent of areas occupied by prairie dogs at any time during the last 20 years" (DEIS at C-170). This inconsistency must be corrected in the revised DEIS	n	Thanks for the comment and agreed that there is a discrepancy in the time frames for prairie dog habitat. On C-170 and Glossary –page 28 definition of Prairie Dog Habitat is 20 years. Active Prairie dog habitat in Alternative B is 10 years? This discrepancy will be edited in the Final.
DR-MTDK-BL-13-0426-27	Wildlife	BLM has failed to define activities that may be considered "not detrimental" to the prairie dog, associated species, or their habitats in its description of exception criteria for NSO and CSU stipulations. Without this explanation, BLM may unreasonably deny exceptions for activities that may not be detrimental, including certain oil and gas activities. BLM must recognize that oil and gas development and the construction of associated infrastructure may be considered to be "not detrimental" to the prairie dog, associated, species, or their habitats due to the employment of best management practices, including efforts to limit surface disturbance, as well FWS' conclusions about the impacts of development and persistence of prairie dog towns	n	thank you for your comment.
DR-MTDK-BL-13-0426-28	Wildlife	BLM must also clearly identify and map black-footed ferret habitat in a revised DEIS	n	3.7.3.5 Mammals, pages 380 and 381, describe black-tailed and white-tailed prairie dog acreage within the Billings Field Office. This acreage would be considered black-footed ferret habitat and due to the relative small acreage a Map was not included. According to the Glossary definition, page 5, "Black-footed ferret habitat: a complex of prairie dog towns within 1.5 kilometers of each other comprising a total of 1,000 acres." , there is not black-footed ferret habitat on public lands within the field office.
DR-	Wildlife	Page 2-43, All alternatives -"Prior to surface disturbance, potential black-footed	n	With a negative black-footed ferret (BFF) examination, no restrictions would be

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
MTDK-BL-13-0426-29		ferret habitat (prairie dog colonies and complexes 80 acres or more in size and not designated as black-footed ferret reintroduction sites) would be examined to determine the absence or presence of black-footed ferrets (CSU). The findings of this examination could result in some restrictions to the operator's plans or could even preclude use and occupancy that would be in violation of the Endangered Species Act of 1973."COMMENT: BLM has failed to provide detail regarding the types of restrictions that could be placed on operator's plans based on the examination described above. In order for affected public lands users in the planning area to fully understand the impact of this management prescription; a revised DEIS must contain an adequate description of the type of restrictions that could result due to the findings of this examination		implemented for ferrets, other than protection or mitigation for the prairie dogs. A positive BFF finding would trigger consultation with U.S. Fish and Wildlife Services (USFWS), Endangered Species Office. Restrictions would be determined by USFWS.
DR-MTDK-BL-13-0426-3	Wildlife	We find BLM's use of Greater Sage-grouse data not directly applicable to the planning area highly problematic and outside the requirements of NEPA. While we recognize NEPA allows for the best available science to be used during planning, the fact that none of the data referenced by BLM applies to the lands and habitat under the jurisdiction of Billings Field Office cannot be utilized as the basis for decisions, particularly given that they are based upon data derived from intensively developed natural gas fields that are completely uncharacteristic to the planning area	n	<p>Before beginning the Billings and Pompeys Pillar National Monument RMP/EIS and throughout the planning effort, the BLM and the Forest Service considered the availability of data from all sources, adequacy of existing data, data gaps, and the type of data necessary to support informed management decisions at the land-use plan level. The data needed to support broad-scale analysis of the planning area are substantially different than the data needed to support site-specific analysis of projects. The RMP/EIS data and information is presented in map and table form and is sufficient to support the broad scale analyses required for land use planning.</p> <p>The BLM and the Forest Service used the most recent and best information available that was relevant to a land-use planning-level analysis including the Baseline Environmental Report (BER; Manier et al. 2013). The BER assisted the BLM and the Forest Service in summarizing the effect of their planning efforts at a range-wide scale, particularly in the affected environment and cumulative impacts sections. The BER looked at each of the threats to greater sage-grouse identified in the Fish and Wildlife Service's "warranted but precluded" finding for the species. For these threats, the report summarized the current scientific understanding, as of report publication date (June 2013), of various impacts to greater sage-grouse populations and habitats. The report also quantitatively measured the location, magnitude, and extent of each threat. These data were used in the planning process to describe threats at other levels, such as the sub-regional boundary and WAFWA Management Zone scale, to facilitate comparison between sub-regions. The BER provided data and information to show how management under different alternatives may meet specific plans, goals, and objectives.</p> <p>Additionally, the BLM and the Forest Service consulted with, collected, and incorporated data from other agencies and sources, including but not limited to the U.S. Fish and Wildlife Service and Montana Fish, Wildlife and Parks. As a result of these actions, the BLM and the Forest Service gathered the necessary data essential to make a reasoned choice among the alternatives</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
				<p>analyzed in detail in the DRMP/EIS, and provided an adequate analysis that led to an adequate disclosure of the potential environmental consequences of the alternatives. As a result, the BLM and the Forest Service have taken a “hard look,” as required by the NEPA, at the environmental consequences of the alternatives in the DRMP/EIS to enable the decision maker to make an informed decision. Finally, the BLM and the Forest Service have made a reasonable effort to collect and analyze all available data.</p> <p>The requisite level of information necessary to make a reasoned choice among the alternatives in an EIS is based on the scope and nature of the proposed decision. The baseline data provided in [Chapter XX] and various appendices including [cite appendix(es)] in the [name of particular amendment] is sufficient to support, at the general land use planning-level of analysis, the environmental impact analysis resulting from management actions presented in the DRMP/EIS.</p> <p>A land use planning-level decision is broad in scope and, therefore, does not require an exhaustive gathering and monitoring of baseline data. Although the BLM and the Forest Service realize that more data could always be gathered, the baseline data provides the necessary basis to make informed land use plan-level decisions. Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions (BLM Land Use Planning Handbook H-1601-1, Chapter II, A-B at 11-13 and Chapter IV, B at 29; Forest Service Handbook 1909.12 – Land Management Planning). The BLM and the Forest Service will conduct subsequent project-specific NEPA analyses for projects proposed for implementation under the land use plan, which may include but are not limited to fuels treatment, habitat restoration, [etc.; list others as applicable]. The subsequent NEPA analyses for project-specific actions will tier to the land-use planning analysis and evaluate project impacts at the appropriate site-specific level (40 CFR 1502.20, 40 CFR 1508.28). As required by NEPA, the public will have the opportunity to participate in the NEPA process for site-specific actions.</p>
DR-MTDK-BL-13-0426-30	Wildlife	BLM has provided no justification for the management restrictions for the mountain plover in the DEIS, particularly the NSO stipulation within 1/4 mile of plover habitat. These stipulations do not correspond with the FWS' recent listing determinations for the species and its conclusions about the impact of oil and gas development on their habitat	n	Page 27776, Federal Register Notice, Vol. 76, No. 92, May 12, 2011, for Mountain Plover also states, “We expressed concern over the rising trend in oil, gas, and mineral exploration in mountain plover breeding habitat and, while we suggested habitat changes might not be detrimental, we cautioned that roads and human disturbance could impact mountain plover breeding.”
DR-MTDK-BL-13-0426-31	Wildlife	Moreover, we are unable to locate in the DEIS any scientific justification that an additional 1/4 buffer around mountain plover habitat, on top of already designating habitat areas as NSO, is necessary to protect the species during nesting season. In addition, the proposed areas where NSO stipulations will apply in the planning area are wildly inconsistent throughout the EIS. Language in Chapter 2, which requires an NSO stipulation for areas within 1/4 mile of	n	<p>The ¼ mile buffer’s objective is to protect nesting activities during the nesting period from April 1 – July 15th. The NSO’s objective is to protect mountain plover habitat. These are two separate stipulations, one to be used for nesting activity, and the other for longer term habitat protection.</p> <p>Any inconsistencies will be edited in the Final RMP/EIS.</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		mountain plover habitat, is inconsistent with language in Chapter 4 and Appendix H, which state that "Surface use is prohibited within 1/4 mile of active mountain plover nest sites" (DEIS at 4-441 and H-25). Further, Appendix C makes no mention of the 1/4 mile area within habitat, stating only "Surface occupancy and use is prohibited within mountain plover habitat" (DEIS at C-165). These broad inconsistencies must be corrected in a revised DEIS		
DR-MTDK-BL-13-0426-32	Wildlife	Page 2-43, Alternative D -"NSO -" within 1/2 mile of ferruginous hawk nest sites which have been active within the past 2 years. "COMMENT: The DEIS fails to scientifically document the need for this buffer to significantly exceed the FWS's recommended 200 meter (660 feet) buffer around active hawk nests. Accordingly, the buffers in the revised DEIS need to be modified to comport with FWS guidelines	n	According to the following link from USFWS, Wyoming Endangered Species office: http://www.fws.gov/wyominges/Pages/Species/Species_SpeciesConcern/Raptors.html , the Spatial buffer for ferruginous hawks is 1 mile from March 15- July 31.
DR-MTDK-BL-13-0426-33	Wildlife	The proposed restrictions on oil and gas development do not correspond to the current status of big game populations in the planning area. In Chapter 3, BLM explains the relative stability of most species in the planning area, despite a wide-ranging array of threats (DEIS at 3-66 and 3-67). Nevertheless, BLM proposes to apply many unwarranted restrictions on future oil and gas development in big game habitat, including parturition areas and winter range. Most notably, the Preferred Alternative seasonally prohibits surface occupancy on 258,592 acres of big game winter range and would apply CSU stipulations on another 266,819 acres. Given the stability of big game populations, what is BLM's scientific justification for these stipulations? We strongly recommend that BLM reconsider its proposal to impose the proposed stipulations for big game and develop more practical stipulations that correspond with current population figures, along with valid existing lease rights, and balance responsible multiple use-development with protection and conservation of species' and their the habitat	n	The goals, objectives, items in "Management Common" and Alternatives described in Wildlife Habitat and Special Status Species - Chapter 2 are a compilation of several years of research review and public scoping. Several references apply to the impacts of surface disturbing and disruptive activities to big game along with BMPs for the protection of wildlife.
DR-MTDK-BL-13-0426-34	Wildlife	While Chapter 4 includes a brief explanation of the differences between CAPS SCORE 1 (moderate value) and CAPS score 2 (high value) winter range, the stipulations in Appendix C or Chapter 2 fail to correspond to Map 15, which only indicates those areas that have 'high' and 'moderate' values for big game winter range. We recommend that BLM make consistent the stipulations in Appendix C and Map 15 in a revised DEIS by indicating that the high value habitat represents CAPS SCORE 2 and moderate value habitat represents CAPS SCORE 1 in Map 15. In addition, while Appendix C indicates the stipulations that will apply to CAPS SCORE 1 and CAPS SCORE 2 areas, Chapter 2 does not. This must be corrected in a revised DEIS	n	Thank you for the comment. Revisions will be made in Chapter 2 and Map 15. A summary description of the CAPS (Crucial Area Planning System) is included in Appendix H, pages H-37- H-39. Other narrative has been added to this section to explain that this data will be used when MTFWP data does not have Crucial Winter Ranges identified for a specific species. Designated Crucial Winter Ranges will be used in lieu of CAPS data when the data is available. Any references to CAPS data will be updated when Crucial Winter Ranges are designated.
DR-MTDK-BL-13-0426-35	Wildlife	Page 2-46, Alternative D -"TL -" December 1 to March 31 within big game winter range. "COMMENT: The period for which timing limitations will apply is inconsistent in Chapter 2 and Appendix C. While Chapter 2 states that TL stipulations will apply from December 1 to March 31, Appendix C states that TL	n	Thank you for the comment. Consistency revisions will be made in the Final RMP.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		stipulations will apply from December 1 to May 15. Again, the stipulations are inconsistent among the chapters and the appendices in the DEIS and must be corrected in a revised DEIS		
DR-MTDK-BL-13-0426-36	Wildlife	Page 2-45, Alternative D -"TL-" April 1 to July 1 within established big game parturition habitat; CSU -" within big game parturition habitat. "COMMENT: BLM failed to provide maps of big game parturition habitat in the DEIS. As such, we are unable to determine the actual impact timing limitations in these areas will have on future oil and gas development in the planning area. BLM must provide individual maps of these areas in a revised DEIS	n	Thank you for your comment. Parturition habitat has not been mapped or identified at this time for all species. In the future, as these areas are inventoried and identified by Montana Fish, Wildlife, and Parks they will be mapped.
DR-MTDK-BL-13-0426-37	Wildlife	BLM's proposal to prohibit geophysical exploration in big horn sheep habitat is unfounded and inconsistent with BLM Manual 3150 (L)(.11), Onshore Oil and Gas Geophysical Exploration Surface Management Requirements, which classifies geophysical activities as a "casual use". Casual use is defined in the Manual as "Activities that do not cause any appreciable disturbance or damage to the public land or resources or existing improvements on that land are considered casual use." In fact, the Manual clearly recommends that exploration in closed areas as well as in areas subject to no surface occupancy stipulations be allowed because "geophysical data collected from areas closed for oil and gas development may provide additional insights into the interpretation of data collected in other areas that are open to development." We recommend that BLM revise its management approach for geophysical activities in all sections of the DEIS to comport with established Bureau policy	N	Thank you for your comment. On BLM managed public land within the Billings Field Office, the land identified as bighorn sheep habitat is also WSA (No Lease), ACEC (NSO), or lands with wilderness characteristics (no lease), so the restrictions for bighorn sheep habitat are consistent with the area.
DR-MTDK-BL-13-0426-38	Fisheries	What is BLM's justification for the requirement of an NSO stipulation for future oil and gas leases within 1/4 miles of reservoirs with fisheries and 1/2 mile within Class I streams? Moreover, BLM has failed to adequately demonstrate how or why oil and gas development within these distances would negatively impact water quality or fisheries in Chapters 3 or 4. Historic BLM buffers for oil and gas development around stream and river channels and banks have been limited to 300 to 500 feet and have proven to be a reliable mitigation measure to protect fish and water resources. Furthermore, BLM would allow oil and gas leasing with a CSU stipulation within 300 feet of riparian and wetland areas in this DEIS (p. 2-47). It is irrational to assume that a 300 foot CSU buffer as applied to riparian and wetland areas would not provide the same level of protection to reservoirs and streams. Additionally, BLM has not mapped these reservoirs and apparently does not know the actual acreage that will be impacted by the 1/4 mile buffer around reservoirs (DEIS at 4-441)	n	<p>The NSO stipulation of ¼ mile for reservoirs with fisheries has been in place since the 1984 RMP ROD. The justification is to provide an increased level of protection to these valuable resources. It is true, the BiFO does not have a complete inventory of reservoirs on public lands, nor solid records of fish presence/absence in identified reservoirs. However, during NEPA analysis for any O&G leasing, reservoirs would be identified and classified as fish bearing or not.</p> <p>The 300 foot setback stipulated for riparian areas, waterbodies, floodplains and wetlands is the minimal setback BLM believes would meet the objective of protecting water quality and riparian habitat. As other resources are put on the table (YCT, sensitive species, critical habitats), BLM increases the set back to offer a further level of protection, as supported by the fact that increased spatial separation would lower the chances pollutants would impact a given water body.</p> <p>Furthermore, Waivers, Exclusions and Modifications may be granted to a developer if said developer can produce a BLM approved plan that exhibits the action would not have unacceptable adverse impacts on a given resource.</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
DR-MTDK-BL-13-0426-39	Wildlife	BLM does not indicate which of the habitats identified in Map 25 will be designated as TL in the DEIS. Map 25 indicates that Sprague's Pipit distribution is found in optimal, medium, low, and unsuitable habitat areas, but Appendix C and Chapter 2 only state that TL stipulations will apply simply to 'habitat.' BLM must clearly explain which of these habitat areas will be subject to TL stipulations in the revised DEIS	n	Thanks for the comment. Sprague's pipit habitat will be defined as "Optimal and Moderate" Suitable Habitat on Map 25.
DR-MTDK-BL-13-0426-4	NEPA	BLM has failed to explain its rationale for selecting the Preferred Alternative. It is inadequate for BLM to simply identify a preferred alternative without providing detailed analysis that supports WHY such an alternative is in the best interest of the agency and public. According to the BLM's Land Use Planning Manual and Land Use Planning Handbook, II.A.7, pg. 22 (Rel. 1-1693 03/11/05), BLM must identify how the Preferred Alternative best meets the multiple use and sustained yield requirements of FLPMA. This lack of meaningful analysis constitutes a fatal flaw in the DEIS. Therefore, in accordance with 40 CFR 1502.0(a), we find the DEIS "inadequate as to preclude meaningful analysis" and recommend the agency prepare and circulate a revised draft Joint Association Comments on Billings/Pompey's Pillar DEIS/RMP which provides the analysis necessary to support each of the management alternatives, including the preferred alternative	N	Thank you for your comment. Rationale for selecting the Preferred Alternative is presented in Chapter 2, Introduction.
DR-MTDK-BL-13-0426-40	Wildlife	The NTT Report is not supported by the Western Association of Fish and Wildlife Agencies (WAFWA) as BLM's sole source of Sage-grouse management direction. In a letter sent to the Interior Secretary on May 16, 2013 WAFWA member states made it clear that they never endorsed the sole use of the NTT or any other scientific publication to determine appropriate management of Sage-grouse habitat. Rather, they believe that a variety of peer-reviewed publications which collectively provide the best available science for sage-grouse should have been used by BLM as the basis for conserving the Sage-grouse, thereby avoiding a listing under the Endangered Species Act (ESA). WAFWA went on to recommend that management and regulatory mechanisms be based upon the best available science which would provide the best strategy for near- and long-term management of sage-grouse and provides the best opportunity for precluding the need to list the species under the ESA	n	The NTT report (or BER, or COT) is not the sole source of management decisions for the range of alternatives. A National Technical Team (NTT) was formed as an independent, science-based team to ensure that the best information about how to manage the greater sage-grouse is reviewed, evaluated, and provided to the BLM and the Forest Service in the planning process. The group produced a report in December 2011 that identified science-based management considerations to promote sustainable greater sage-grouse populations. The NTT is staying involved as the BLM and the Forest Service work through the Strategy to make sure that relevant science is considered, reasonably interpreted, and accurately presented; and that uncertainties and risks are acknowledged and documented. A baseline environmental report, titled Summary of Science, Activities, Programs, and Policies That Influence the Rangeland Conservation of Greater Sage-grouse (<i>Centrocercus urophasianus</i>) (referred to as the BER), was released on June 3, 2013, by the U.S. Geological Survey. The peer-reviewed report summarizes the current scientific understanding about the various impacts to greater sage-grouse populations and habitats and addresses the location, magnitude, and extent of each threat. The BER does not provide management options. The report is being used by the BLM and the Forest Service in our efforts to develop regulatory mechanisms and improve our conservation efforts of the greater sage-grouse and its habitat to reduce the potential for listing it under the Endangered Species Act. The data for this report were gathered from BLM, Forest Service, and other sources and were the "best

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				<p>available" at the range-wide scale at the time collected. The report provides a framework for considering potential implications and management options, and demonstrates a regional context and perspective needed for local planning and decision-making.</p> <p>In March 2012, the FWS initiated a collaborative approach to develop range-wide conservation objectives for the greater sage-grouse to inform the 2015 decision about the need to list the species and to inform the collective conservation efforts of the many partners working to conserve the species. In March 2013, this team of State and FWS representatives, released the Conservation Objectives Team (COT) report based upon the best scientific and commercial data available at the time that identifies key areas for greater sage-grouse conservation, key threats in those areas, and the extent to which they need to be reduced for the species to be conserved. The report serves as guidance to Federal land management agencies, State greater sage-grouse teams, and others in focusing efforts to achieve effective conservation for this species.</p> <p>The range of alternatives is based upon analysis of public scoping comments as well as information provided in the NTT report, the BER, the COT report, and State management plans. The alternatives represent different degrees of and approaches to balancing resources and resource use among competing human interests, land uses, and the conservation of natural and cultural resource values, while sustaining and enhancing ecological integrity across the landscape, including plant, wildlife, and fish habitat.</p> <p>Greater sage-grouse conservation measures in A Report on National Greater Sage-grouse Conservation Measures (NTT 2011) were used to form BLM and the Forest Service management direction under at least one alternative (Alternative B and portions of D), which is consistent with the direction provided in BLM Washington Office Instruction Memorandum 2012-044 (the BLM must consider all applicable conservation measures developed by the NTT in at least one alternative in the land use planning process).</p> <p>Additionally, all alternatives considered within this planning process are consistent with conservation measures and objectives outlined in the COT Report and follow the basic principles of: (1) avoiding the impact of an activity; (2) minimizing impacts by limiting the degree of activity; and (3) mitigating for an impact by improving or enhancing greater sage-grouse habitat. Each of the alternatives considers different means for accomplishing this strategy. For example, some alternatives place greater emphasis on avoidance of impacts, whereas other alternatives place more emphasis on minimization and mitigation.</p> <p>While there was consistent direction provided in alternative develop, such as BLM WO IM 2012-044, variation across sub-regionals was needed to</p>

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				accommodate the local issues and specific state and Forest Service requirements.
DR-MTDK-BL-13-0426-41	Wildlife	<p>Another major fundamental concern the signatories to this letter wish to raise is the inherent flaw in BLM's basic assumptions, due in part to the flawed recommendations contained in the NTT report, which fail to recognize that the level of disturbance associated with a well is not a constant throughout its life. The highest level of surface disturbance associated with oil and gas development occurs primarily during the construction, drilling and completion phases, which can last a little as a day or two up to a few months, depending upon the time it takes to complete the well. Once a well goes into production, these activities subside dramatically and only regular monitoring and maintenance of the well are required. Shortly after well completion, the operator typically begins interim reclamation actions designed to partially restore any impacted habitat. This partial reclamation will remain in effect until the well has been depleted. Upon conclusion of production activity, the operator will then move forward with plugging and abandonment procedures, which also includes final reclamation that will ultimately result in full restoration of the site and its return to productive habitat</p>	n	<p>Thank you for your comment. The NTT report (or BER, or COT) is not the sole source of management decisions for the range of alternatives. A National Technical Team (NTT) was formed as an independent, science-based team to ensure that the best information about how to manage the greater sage-grouse is reviewed, evaluated, and provided to the BLM and the Forest Service in the planning process. The group produced a report in December 2011 that identified science-based management considerations to promote sustainable greater sage-grouse populations. The NTT is staying involved as the BLM and the Forest Service work through the Strategy to make sure that relevant science is considered, reasonably interpreted, and accurately presented; and that uncertainties and risks are acknowledged and documented.</p> <p>A baseline environmental report, titled Summary of Science, Activities, Programs, and Policies That Influence the Rangewide Conservation of Greater Sage-grouse (<i>Centrocercus urophasianus</i>) (referred to as the BER), was released on June 3, 2013, by the U.S. Geological Survey. The peer-reviewed report summarizes the current scientific understanding about the various impacts to greater sage-grouse populations and habitats and addresses the location, magnitude, and extent of each threat. The BER does not provide management options. The report is being used by the BLM and the Forest Service in our efforts to develop regulatory mechanisms and improve our conservation efforts of the greater sage-grouse and its habitat to reduce the potential for listing it under the Endangered Species Act. The data for this report were gathered from BLM, Forest Service, and other sources and were the "best available" at the range-wide scale at the time collected. The report provides a framework for considering potential implications and management options, and demonstrates a regional context and perspective needed for local planning and decision-making.</p> <p>In March 2012, the FWS initiated a collaborative approach to develop range-wide conservation objectives for the greater sage-grouse to inform the 2015 decision about the need to list the species and to inform the collective conservation efforts of the many partners working to conserve the species. In March 2013, this team of State and FWS representatives, released the Conservation Objectives Team (COT) report based upon the best scientific and commercial data available at the time that identifies key areas for greater sage-grouse conservation, key threats in those areas, and the extent to which they need to be reduced for the species to be conserved. The report serves as guidance to Federal land management agencies, State greater sage-grouse teams, and others in focusing efforts to achieve effective conservation for this species.</p>

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				<p>The range of alternatives is based upon analysis of public scoping comments as well as information provided in the NTT report, the BER, the COT report, and State management plans. The alternatives represent different degrees of and approaches to balancing resources and resource use among competing human interests, land uses, and the conservation of natural and cultural resource values, while sustaining and enhancing ecological integrity across the landscape, including plant, wildlife, and fish habitat.</p> <p>Greater sage-grouse conservation measures in A Report on National Greater Sage-grouse Conservation Measures (NTT 2011) were used to form BLM and the Forest Service management direction under at least one alternative , in the case of the Billings and Pompey Pillar RMP/EIS – Alternative B and portions of Alternative D, which is consistent with the direction provided in BLM Washington Office Instruction Memorandum 2012-044 (the BLM must consider all applicable conservation measures developed by the NTT in at least one alternative in the land use planning process).</p> <p>Additionally, all alternatives considered within this planning process are consistent with conservation measures and objectives outlined in the COT Report and follow the basic principles of: (1) avoiding the impact of an activity; (2) minimizing impacts by limiting the degree of activity; and (3) mitigating for an impact by improving or enhancing greater sage-grouse habitat. Each of the alternatives considers different means for accomplishing this strategy. For example, some alternatives place greater emphasis on avoidance of impacts, whereas other alternatives place more emphasis on minimization and mitigation.</p> <p>While there was consistent direction provided in alternative develop, such as BLM WO IM 2012-044, variation across sub-regionals was needed to accommodate the local issues and specific state and Forest Service requirements.</p>
DR-MTDK-BL-13-0426-42	Wildlife	<p>Table 2-5 presents several different classifications of sage-grouse lease terms and stipulations. The information contained in Appendix C (Alternative D) is completely inconsistent with that presented in Table 2-5. For example, Table 2-5 discusses timing limitation stipulations for greater sage-grouse winter range within 2 miles of a lek from December 1 to March 1. However, Appendix C (Alternative D -" Page C-184) states "Surface use is prohibited within sage grouse winter range from December 1 through March 1. Sage grouse winter ranges not identified, due to lack of inventories, are delineated by a 3 mile buffer from lek sites." Such inconsistencies make it impossible to provide reasoned comments on BLM's proposed action. Please clarify. The admission that BLM has been unable to rely upon an existing inventory which clearly identifies sage-grouse winter ranges relates to the very concern raised at the beginning of these comments. BLM does not currently possess the data required to make land</p>	n	<p>Thank you for the comment. The discrepancies have been noted and revisions are being made in the Final RMP/EIS to make consistent recommendations throughout the document.</p>

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		management decisions. Table 2-5 discusses timing limitation stipulations for greater sage grouse nesting habitat within 3 miles of a lek from March 1 to June 15; and for "new oil and gas leases" in greater sage-grouse habitat. However, Appendix C (Appendix D -" Page C-189) states "Sage Grouse Nest Areas (Restoration Areas and General Habitat Areas) - surface use is prohibited from March 1 through June 30 within 3 miles of sage grouse leks. This stipulation does not apply to operation and maintenance of production facilities." Is it June 15 or June 30? Does this also mean to apply only to "new oil and gas leases" as alluded to in Table 2-5?		
DR-MTDK-BL-13-0426-43	NEPA	We strongly object to current management being used as the baseline for determining potential environmental consequences when compared to other alternatives. Alternative A is far from a baseline because it reflects already implemented prescriptive management decisions and restrictive lease stipulations. We question why BLM did not determine the effectiveness of the measures currently in place based upon the baseline data collected before current management was implemented. In so doing, BLM would get a picture of how current management is actually working. Clearly, BLM is utilizing this methodology to arbitrarily "raise the bar" in order to rationalize future management options that are in reality unjustifiable	N	Thank you for your comment. When the proposed action involves updating an adopted management plan, the no-action alternative is the continuation of the current management plan. The baseline is a description of the affected environment at a fixed point in time, whereas the no-action alternative assumes that other things will happen to the affected environment even if the proposed action does not occur.
DR-MTDK-BL-13-0426-44	Wildlife	Throughout the Affected Environment discussion regarding sage-grouse, much of the information presented is based on studies of Sage Grouse Management Zone 1 (MZ1), which includes northeastern Wyoming and far western North and South Dakota. This broader scale may or may not be directly applicable to the Billings/Pompey's Pillar planning area. The discussion should be refined to the Billings/Pompey's Pillar planning area consistent with the direction provided on Page 3-1. Individual comments along this same vein are made below reflecting this concern as it applies to specific topics. Although analysis of MZ1 (or MZ2) would be appropriate as a study area for analysis of cumulative impacts to sage-grouse (see comments directed to Cumulative Effects below), potential direct and indirect impacts to sage-grouse and sage-grouse habitat resulting from the RMP should address conditions and potential direct and indirect impacts specific to the Billings/Pompey's Pillar planning area	n	Habitat in MZ1 is comparable throughout the Eastern Montana and NE Wyoming area. The Billings Field Office only has a small area south of Bridger, MT. to the Wyoming state line, that is within MZ2. BLM considered that habitat is very similar between the two management zones and analyzed them as one entity for consistency. From page 3-86, - "descriptions of MZ1 are mostly the same as those that would be described for the northern portion of MZ2 found in the planning area." Currently, a research project on sage-grouse in MZ2 is being conducted. Local management considerations will be developed based on the findings of this research.
DR-MTDK-BL-13-0426-45	Wildlife	It is obscure how the management directives in the planning area relate to the designations of Management Zone 1 (MZ1) and Management Zone 2 (MZ2). If the issues and descriptions are mostly the same for MZ1 and MZ2, what is the purpose of separating MZ1 and MZ2 into different management zones? The text on pages 3-86 and 3-87 describes the ecology and flora of MZ1 but does not address the flora of MZ2, in which the majority of sage-grouse habitat in the planning area is located. Because the management zones are separated on the basis of floristic provinces, it would be expected that the flora would differ between the two zones. How does the differing flora in MZ1 and MZ2 affect	n	Thank you for your comment. Habitat in MZ1 is comparable throughout the Eastern Montana and NE Wyoming area. The Billings Field Office only has a small area south of Bridger, MT. to the Wyoming state line, that is within MZ2. BLM considered that habitat is very similar between the two management zones and analyzed them as one entity for consistency. From page 3-86, - "descriptions of MZ1 are mostly the same as those that would be described for the northern portion of MZ2 found in the planning area." Currently, a research project on sage-grouse in MZ2 is being conducted. Local management considerations will be developed based on the findings of this

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		proposed management of sage-grouse in the planning area? The text on page 88 and 89 continue to expand on the ecological characteristics of MZ1 in relation to fire ecology and grazing effects on sage-brush habitat, noting how MZ1 differs from other management zones. Similarly, effects of energy development in MZ1 are addressed in detail, but the relationship of the effects of energy development in MZ1 to the planning area in general and MZ2 in particular are not addressed. Please correct this		research.
DR-MTDK-BL-13-0426-46	Wildlife	Page 3-87, "Greater sage-grouse populations have declined in portions of the MZ1 through wholesale loss of habitat as well as through impacts to birds on the remaining habitat through disturbance and direct mortality." COMMENT: What is the source of this information and to which parts of the Billings/Pompey's Pillar planning area does this statement apply? What are the sources of direct mortality in the Billings/Pompey's Pillar planning area (or outside of the planning area) that have caused declines sage-grouse in populations? At the population level it is very difficult to ascribe population declines to direct mortality. Populations are cyclic and influenced by many factors including weather. The report by Samson et al (2004) is simply a general discussion of birds associated with prairie grassland habitats in the Great Plains. Although the past and current effects of management in parts of MZ1 are addressed in this RMP/EIS, the influence of these factors on sage-grouse in the Billings/Pompey's Pillar planning area (specifically) is unclear. What is the status of sage-grouse populations in Billings/Pompey's Pillar planning area? The draft RMP/EIS seems to equate Sage-Grouse MZ1 with the planning area (even though it states sage grouse habitat within the planning areas lies in MZ2), but does not present a rationale for how the MZ2 planning area is similar or dissimilar to the MZ1 planning area. Much of the discussion hinges on information gathered on a broader scale, which may or may not have direct applicability to the Billings/Pompey's Pillar planning area (i.e., MZ1 includes populations and subpopulations of sage-grouse in both northeastern Wyoming or far western North and South Dakota). Please clarify the above, and provide a more robust discussion of the Billings/Pompey's Pillar planning area specifically	n	Refer to the DRMP, Ch. 3, pgs. 3-85 and 86 for BIFO current sage-grouse population information. Habitat threats are described on pg. 3-85. These habitat threats can be directly related to long term mortality of sage-grouse. Habitat in MZ1 is comparable throughout the Eastern Montana and NE Wyoming area. The Billings Field Office only has a small area south of Bridger, MT. to the Wyoming state line, that is within MZ2. BLM considered that habitat is very similar between the two management zones and analyzed them as one entity for consistency. From page 3-86, - "descriptions of MZ1 are mostly the same as those that would be described for the northern portion of MZ2 found in the planning area." Currently, a research project on sage-grouse in MZ2 is being conducted. Local management considerations will be developed based on the findings of this research. Refer to Ch. 3, pgs. 3-85 and 86 for BIFO current sage-grouse population information. Habitat threats are described on pg. 3-85. These habitat threats can be directly related to long term mortality of sage-grouse.
DR-MTDK-BL-13-0426-47	Wildlife	The publication of Samson et al (2004) does not address sagebrush ecosystems in Sage- Grouse MZ1. This paper addresses prairie grasslands in the Great Plains, which represents a much larger area. Nor does Samson et al (2004) differentiate between prairie grasslands and sagebrush steppe. It is necessary for BLM to clearly present information on (quantify) the amount of sagebrush habitat that has been converted to agricultural uses within the Billings/Pompey's Pillar planning area specifically. The DEIS seems to equate Sage-Grouse MZ1 with the Billings/Pompey's Pillar planning area, but does not present a rationale for how MZ1 is similar or dissimilar to the planning area. As discussed above, MZ1 includes populations and subpopulations of sage-grouse in both	n	A discussion of CRP acreage and trends statewide is included on pages 4-287 and 288 of the DRMP. Data comparing agricultural uses specific to the field office and sage-grouse management MZ zones is not available.

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DR-MTDK-BL-13-0426-48	Wildlife	<p>northeastern Wyoming or far western North and South Dakota</p> <p>Page 3-88, "Individual species have different thresholds of fragmentation tolerance; greater sagegrouse have large spatial requirements and eventually disappear from landscapes that no longer contain large patches of habitat while smaller birds like Sprague's pipit can persist in landscapes with smaller patches of habitat because their spatial requirements are smaller." COMMENT: BLM fails to provide any citation for its information regarding patch size thresholds for sage-grouse. This concept has important management implications and patch size thresholds for sage-grouse must be identified in order to avoid habitat fragmentation impacts. We recommend this information be included in revised planning documents</p>	n	<p>thank you for your comment. Before beginning the Billings and Pompeys Pillar National Monument RMP/EIS and throughout the planning effort, the BLM and the Forest Service considered the availability of data from all sources, adequacy of existing data, data gaps, and the type of data necessary to support informed management decisions at the land-use plan level. The data needed to support broad-scale analysis of the planning area are substantially different than the data needed to support site-specific analysis of projects. The RMP/EIS data and information is presented in map and table form and is sufficient to support the broad scale analyses required for land use planning.</p> <p>The BLM and the Forest Service used the most recent and best information available that was relevant to a land-use planning-level analysis including the Baseline Environmental Report (BER; Manier et al. 2013). The BER assisted the BLM and the Forest Service in summarizing the effect of their planning efforts at a range-wide scale, particularly in the affected environment and cumulative impacts sections. The BER looked at each of the threats to greater sage-grouse identified in the Fish and Wildlife Service's "warranted but precluded" finding for the species. For these threats, the report summarized the current scientific understanding, as of report publication date (June 2013), of various impacts to greater sage-grouse populations and habitats. The report also quantitatively measured the location, magnitude, and extent of each threat. These data were used in the planning process to describe threats at other levels, such as the sub-regional boundary and WAFWA Management Zone scale, to facilitate comparison between sub-regions. The BER provided data and information to show how management under different alternatives may meet specific plans, goals, and objectives.</p> <p>Additionally, the BLM and the Forest Service consulted with, collected, and incorporated data from other agencies and sources, including but not limited to the U.S. Fish and Wildlife Service and Montana Fish, Wildlife and Parks. As a result of these actions, the BLM and the Forest Service gathered the necessary data essential to make a reasoned choice among the alternatives analyzed in detail in the DRMP/EIS, and provided an adequate analysis that led to an adequate disclosure of the potential environmental consequences of the alternatives. As a result, the BLM and the Forest Service have taken a "hard look," as required by the NEPA, at the environmental consequences of the alternatives in the DRMP/EIS to enable the decision maker to make an informed decision. Finally, the BLM and the Forest Service have made a reasonable effort to collect and analyze all available data.</p> <p>The requisite level of information necessary to make a reasoned choice among the alternatives in an EIS is based on the scope and nature of the proposed decision. The baseline data provided in [Chapter XX] and various appendices</p>

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				<p>including [cite appendix(ces)] in the [name of particular amendment] is sufficient to support, at the general land use planning-level of analysis, the environmental impact analysis resulting from management actions presented in the DRMP/EIS.</p> <p>A land use planning-level decision is broad in scope and, therefore, does not require an exhaustive gathering and monitoring of baseline data. Although the BLM and the Forest Service realize that more data could always be gathered, the baseline data provides the necessary basis to make informed land use plan-level decisions. Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions (BLM Land Use Planning Handbook H-1601-1, Chapter II, A-B at 11-13 and Chapter IV, B at 29; Forest Service Handbook 1909.12 – Land Management Planning). The BLM and the Forest Service will conduct subsequent project-specific NEPA analyses for projects proposed for implementation under the land use plan, which may include but are not limited to fuels treatment, habitat restoration, [etc.; list others as applicable]. The subsequent NEPA analyses for project-specific actions will tier to the land-use planning analysis and evaluate project impacts at the appropriate site-specific level (40 CFR 1502.20, 40 CFR 1508.28). As required by NEPA, the public will have the opportunity to participate in the NEPA process for site-specific actions.</p>
DR-MTDK-BL-13-0426-49	Wildlife	<p>While the DEIS addresses grazing in MZ1, there is no specific discussion of grazing and the associated range condition within sage-grouse habitats in the Billings planning area. Water developments and associated West Nile virus are addressed for MZ1 but again, no mention is made of whether or how West Nile virus has affected sage-grouse in the Billings planning area, specifically. Absent information related directly to the BFO, this statement is unfounded. The revised planning documents must directly discuss how grazing and West Nile virus have impacted the planning area</p>	n	<p>please see table 3-16 which addresses acres/grazing allotments meeting standards and guides. Research on West Nile virus in this Field Office area is very limited. West Nile virus was first detected in this study area in central Montana in August 2005. West Nile virus was likely a major contributor to the decrease in survival observed in this study between August 2004 (0.94 to 0.98) and August 2005 (0.84 to 0.94). (Breeding Ecology, Survival Rates, and Causes of Mortality of Hunted and Nonhunted Greater Sage-grouse in Central Montana, MSU Masters Thesis, J. Sika, 2006. Due to the lack of information in the field office area, a reference to it was included. Information from surrounding areas has been referenced.</p>
DR-MTDK-BL-13-0426-5	NEPA	<p>Another significant problem with the BLM's planning documentation is the 1-Km resolution datasets and 1:2,000,000 scale maps used in the BLM planning process. While this scale of maps may be a viable tool for multi-state or sub-continental planning efforts, it becomes totally meaningless at field office or even county level. With respect to the Greater Sage-grouse, datasets and mapping at these scales grossly mischaracterize historic and potential habitat by including non-habitat as well as overlooking microhabitat characteristics, especially in diverse and fragmented landscapes. Likewise, threats to sage grouse are also entirely overestimated when using sub-continental scale mapping, such as that used in the planning effort. It is ironic that when BLM requires maps from industry, they must be at a 1:24,000 scale rather than the scale BLM believes is</p>	N	<p>Thank you for your comment.</p>

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DR-MTDK-BL-13-0426-50	Wildlife	<p>appropriate for a much larger planning effort</p> <p>Page 3-89, "Currently, nearly 16% of the MZ is within 3km of oil and gas wells, a distance where ecological effect is likely to occur (Knick et al 2011)."COMMENT: Energy development in MZ1 is addressed; however, energy development in MZ2 and in particular the Billings/Pompey's Pillar planning area is not addressed in similar detail. What percentage of Billings/Pompey's Pillar planning area (MZ2) is within 3km of oil and gas wells and how would that affect proposed sage-grouse management in this specific planning area? Absent information related directly to the BFO, this statement is unjustifiable. The revised planning document must discuss directly the proximity of oil and gas wells to sage-grouse habitat and leks</p>	n	<p>Thank you for your comment. In response to the greater sage-grouse management objectives described in the 2006 WAFWA Greater Sage-grouse Comprehensive Conservation Strategy, many reports have been prepared for the development of management recommendations, strategies, and regulatory guidelines. The National Technical Team report (NTT 2011), Conservations Objectives Team (COT; FWS 2013), and the Summary of Science, Activities, Programs and Policies that Influence the Rangewide Conservation of Greater Sage-Grouse (also referred to as the Baseline Environmental Report [BER]; Manier et al. 2013) are the most widely used reports that have been incorporated in BLM and Forest Service EISs that address the effects of implementing greater sage-grouse conservation measures on lands they manage.</p> <p>Management actions by the BLM and the Forest Service in concert with other State and Federal agencies, and private land owners play a critical role in the future trends of greater sage-grouse populations. To ensure management actions are effective and based on the best available science, the BLM's National Policy Team created a NTT in August 2011. The objective for chartering this planning strategy effort was to develop new or revised regulatory mechanisms, through land use plans, to conserve and restore greater sage-grouse and their habitat on BLM-administered lands on a range-wide basis over the long term. The NTT report (NTT 2011) used the best current scientific knowledge to guide the BLM and the Forest Service planning efforts through management considerations to ameliorate threats, focused primarily on priority greater sage-grouse habitats on public lands.</p> <p>On December 27, 2011, the BLM released IM 2012-044. In accordance with this IM, the BLM must consider all conservation measures developed by the NTT in at least one alternative in the land use planning process. For the majority of greater sage-grouse DRMP/EISs, Alternative B fulfills this requirement by incorporating the recommendations set forth by the NTT. Other alternatives, including those developed by individuals and conservation groups, as well sub-regional alternatives developed by regional offices of the BLM and the Forest Service, have incorporated elements of the NTT report.</p> <p>The COT report (FWS 2013) qualitatively identifies threats/issues that are important for individual populations across the range of greater sage-grouse, regardless of land ownership. The Summary of Science, Activities, Programs and Policies that Influence the Rangewide Conservation of Greater Sage-Grouse (also referred to as the Baseline Environmental Report [BER]; Manier et al. 2013) then provides complimentary quantitative information to support and supplement the conclusions in the COT. Both documents helped planning teams identify issues within their planning area, determine the context within</p>

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				<p>the management zone, prioritize habitats, and assist in creating a range of alternatives with management actions that can alleviate or mitigate threats to greater sage-grouse at an appropriate level. Both the NTT report and the COT report tier from the WAFWA Greater Sage-grouse Comprehensive Conservation Strategy (Stiver et al. 2006).</p> <p>Alternative B is based on A Report on National Greater Sage-grouse Conservation Measures (NTT report) per direction in IM 2012-044.</p> <p>Conservation measures included in the NTT based alternative focus primarily on greater sage-grouse PPH and include a 3-percent disturbance cap in PPH. PPH areas have the highest conservation value to maintaining or increasing greater sage-grouse populations.</p> <p>Map #24 depicts the location of sage-grouse priority habitat in relation to the RFD (Reasonable Foreseeable Development) potential for oil and gas.</p>
DR-MTDK-BL-13-0426-51	Wildlife	<p>Page 3-89, "Much of the current oil and gas development is occurring on private lands with little or no mitigation efforts, which elevates ecological and conservation importance of sage-grouse habitat on public lands. "COMMENT: What is the source of information that there are little or no mitigation efforts on private land? Does this statement apply to MZ1 or directly to the Billings/Pompey's Pillar planning area? How does current oil and gas development in the planning area compare with respect to private versus public land? This statement fails to recognize the initiatives and advances in technology that been developed in response to elevated concerns over the conservation status of sage-grouse and must be modified in the revised planning documents. Ramey et al (2011) identify the following advances in technology that avoid and reduce potential effects of oil and gas development on sage-grouse: Directional drilling to reduce surface disturbance by drilling multiple wells from one drilling pad; Steerable downhole motors and horizontal well bores that can drill as many as many as 20 boreholes from one pad and greatly increase the effective radius of production from one well pad; More efficient drill bits that reduce drilling times and rates of failure; Lightweight modular drilling rigs which deploy more easily and require a smaller foot print; and Slim-hole drilling, micro-holes and coiled tubing which reduce waste volumes, surface disturbance, and noise</p>	n	<p>Thank you for your comment. The BLM can only make decisions to BLM managed public lands and BLM managed federal mineral estate. Oil and gas development on private land is handled by the state/county.</p>
DR-MTDK-BL-13-0426-52	Wildlife	<p>COMMENT: The listing of sage-grouse as a candidate species under the ESA and its "warranted but precluded" status has increased awareness of the conservation status and conservation efforts and has led to Wyoming, Montana, and other states to develop statewide conservation strategies to protect sage-grouse and their habitat. As such, the RMP/EIS should reference and discuss how such efforts would interface with proposed BLM restrictions. The following are some of the initiatives that have been developed in response to sage-grouse conservation concerns: The Wyoming Governor issued Executive Order 2011-5</p>	n	<p>BLM intends to rely on the latest research and best available science by utilizing existing research and delaying final decisions until the Governor's Sage Grouse Advisory Council recommendations are final, incorporating the "USGS Range-Wide genetic Connectivity of Greater Sage-Grouse Populations" study when it is complete, and incorporating other future research through the "Adaptive Management" approach described in Section 2.3.4.</p> <p>Before beginning the B&PPNM RMP/EIS and throughout the planning effort, the BLM and the Forest Service considered the availability of data from all</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		<p>that establishes guidelines for managing Greater Sage-Grouse Core Area Protection. The Montana Governor issued Executive Order No. 2-2013 establishing a Greater Sage-grouse Habitat Conservation Advisory Council which is mandated to gather information, furnish advice, and provide recommendations to the Governor on policies and actions for a state-wide strategy to preclude the need to list the Greater Sage-grouse under the ESA. The FWS, in 2013, issued the Conservation Objectives Team Report, which provides state, federal, local, and private entities with permitting or land management authority information to support conservation actions for sage-grouse. The Sage-Grouse National Technical Team (2011) produced A Report on National Greater Sage-Grouse Conservation Measures, which addresses the latest science and best biological judgment to assist in making management decisions. WAFWA completed the Greater Sage-Grouse Comprehensive Conservation Strategy (2006), which identifies the critical need to develop associations among local, state, provincial, tribal, and federal agencies, non-governmental organizations, and individual citizens to design and implement cooperative actions to support robust populations of sage-grouse and the landscapes upon which they depend. A joint report (The History and Current Conditions of the Greater Sage-Grouse in Regions with Energy Development - 2007) by U.S. Department of Energy, Interstate Oil and Gas Compact Commission and ALL Consulting provides a historical overview of the sage-grouse to help clarify its regional significance; identifies current conservation plans of important stakeholders; and discusses current and historical management approaches. The Natural Resource Conservation Service (NRCS) with the Western Governors Association published Conserving the Greater Sage-Grouse: Examples of Partnerships and Strategies of Work Across the West, which illustrates the depth of commitment and cooperation that is taking place across the West to conserve the sage-grouse. In 2010, the NRCS and numerous conservation partners (local, state and federal agencies, Tribes, non-governmental organizations) in the Western US established the Sage Grouse Initiative to work towards sustaining working ranches and conserve Greater sage-grouse populations in the West using existing voluntary conservation programs. In addition, the DEIS should have referenced and directly considered information such as the joint report of the Department of Energy, Interstate Oil and Gas Compact Commission and All Consulting (2007),</p>		<p>sources, adequacy of existing data, data gaps, and the type of data necessary to support informed management decisions at the land-use plan level. The data needed to support broad-scale analysis of the Billings Field Office planning area are substantially different than the data needed to support site-specific analysis of projects. The RMP/EIS data and information is presented in map and table form and is sufficient to support the broad scale analyses required for land use planning.</p> <p>The BLM and the Forest Service used the most recent and best information available that was relevant to a land-use planning-level analysis including the Baseline Environmental Report (BER; Manier et al. 2013). The BER assisted the BLM and the Forest Service in summarizing the effect of their planning efforts at a range-wide scale, particularly in the affected environment and cumulative impacts sections. The BER looked at each of the threats to greater sage-grouse identified in the Fish and Wildlife Service’s “warranted but precluded” finding for the species. For these threats, the report summarized the current scientific understanding, as of report publication date (June 2013), of various impacts to greater sage-grouse populations and habitats. The report also quantitatively measured the location, magnitude, and extent of each threat. These data were used in the planning process to describe threats at other levels, such as the sub-regional boundary and WAFWA Management Zone scale, to facilitate comparison between sub-regions. The BER provided data and information to show how management under different alternatives may meet specific plans, goals, and objectives.</p> <p>Additionally, the BLM and the Forest Service consulted with, collected, and incorporated data from other agencies and sources, including but not limited to the U.S. Fish and Wildlife Service and Montana Fish, Wildlife and Parks. As a result of these actions, the BLM and the Forest Service gathered the necessary data essential to make a reasoned choice among the alternatives analyzed in detail in the DRMP/EIS, and provided an adequate analysis that led to an adequate disclosure of the potential environmental consequences of the alternatives see Chapter 4. As a result, the BLM and the Forest Service have taken a “hard look,” as required by the NEPA, at the environmental consequences of the alternatives in the DRMP/EIS to enable the decision maker to make an informed decision. Finally, the BLM and the Forest Service have made a reasonable effort to collect and analyze all available data. The requisite level of information necessary to make a reasoned choice among the alternatives in an EIS is based on the scope and nature of the proposed decision. The baseline data provided in Chapter 3 and various appendices including in the B&PPNM RMP/EIS is sufficient to support, at the general land use planning-level of analysis, the environmental impact analysis resulting from management actions presented in the DRMP/EIS.</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
				A land use planning-level decision is broad in scope and, therefore, does not require an exhaustive gathering and monitoring of baseline data. Although the BLM and the Forest Service realize that more data could always be gathered, the baseline data provides the necessary basis to make informed land use plan-level decisions. Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions (BLM Land Use Planning Handbook H-1601-1, Chapter II, A-B at 11-13 and Chapter IV, B at 29; Forest Service Handbook 1909.12 – Land Management Planning). The BLM and the Forest Service will conduct subsequent project-specific NEPA analyses for projects proposed for implementation under the land use plan, which may include but are not limited to fuels treatment, habitat restoration, [etc.; list others as applicable]. The subsequent NEPA analyses for project-specific actions will tier to the land-use planning analysis and evaluate project impacts at the appropriate site-specific level (40 CFR 1502.20, 40 CFR 1508.28). As required by NEPA, the public will have the opportunity to participate in the NEPA process for site-specific actions.
DR-MTDK-BL-13-0426-53	Wildlife	Page 3-90, "The cumulative and interactive impact of multiple disturbances and habitat loss has influenced the current distribution of greater sage-grouse in MZ1. The cumulative extent of human caused changes, the human footprint, on sage-grouse habitat in MZ1 is highest at the northern edge of the MZ but occurs throughout the MZ (Leu and Hanser 2011) (Figure 3-16). Population centers for greater sage-grouse in MZ1 (Doherty et al 2011) generally correspond to areas lacking high human footprint and some of these areas have been designated as core areas by Montana Fish, Wildlife, and Parks (Montana Fish, Wildlife, and Parks 2010). Greater sage-grouse range in MZ1 is very similar to portions of range where sage-grouse have been extirpated i.e., areas with high human footprints, mostly because of abundance and distribution of sagebrush in the MZ (Wisdom et al 2011) suggesting that sage-grouse in MZ1 are more vulnerable to declines than other portions of sage-grouse range. "COMMENT: As previously noted, the above discussion relates to MZ1 not MZ 2, where the majority of sage-grouse habitat in the Billings planning area is located. Does this statement apply to MZ2? What is the data for MZ2 that would support this assertion? If Sage-Grouse MZ1 is "very" similar to overall portions of the range in which sage-grouse have been extirpated, mostly because of the abundance and distribution of sagebrush, please explain why were the seven sage-grouse management zones delineated based on floristic provinces? Presumably, they differed based on floristic characteristics of which sagebrush is a major component. Suggesting that sage-grouse are more vulnerable to declines in MZ1 because of the abundance and distribution of sagebrush does not appear to have a scientific basis. Based on human effects to sagebrush habitat, it would appear that MZ1 would be the least likely to experience extirpation of sage-grouse. The following	n	The habitat delineations were created by the BLM, Forest Service, and FWS in collaboration with State fish and wildlife agencies that are responsible for managing and monitoring greater sage-grouse populations. Based on the Baseline Environmental Report and in cooperation with the Montana Fish, Wildlife and Parks, the BLM created the PHMA and GHMA (Mainer et al. 2013). For the Billings and Pompeys Pillar National Monument RMP/EIS revision, the BLM and Forest Service worked with the Montana Fish, Wildlife and Parks and presented the scientific information used to determine the PHMA and GHMA delineations and findings. Additionally, the BLM and the Forest Service used the best available scientific data, including recent sources such as the COT report, NTT report, and BER to develop management recommendations, strategies and regulatory guidelines to meet the greater sage-grouse management objectives in the 2006 WAFWA Greater Sage-grouse Comprehensive Conservation Strategy. These documents were based on recent, published, and peer-reviewed scientific data developed by an interdisciplinary team of Federal and State scientists and resource managers.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		<p>statement from Page 3-81 would support the contention that sage-grouse in MZ1 are the least likely to experience impacts from the "human foot print," "Current estimates suggest that about 16 percent of the management zone is within 6.9 kilometers of urban development, although Sage-Grouse Management Zone 1 generally has lower rates of population increases compared to other management zones (Knick et al 2011)." How does the vulnerability to extirpation in MZ2 relate to BLM's contention in the DEIS that sage-grouse in MZ1 are more vulnerable to extirpation? The above-cited quotation is the same for the MCFO, HiLine, and Billings/Pompey's Pillar planning areas. It appears that the draft RMP/EISs relied on the same information in MZ1 to formulate management actions; however, none of these documents relates sage-grouse populations and habitat in MZ1 or MZ2 to population and habitat conditions in their respective planning areas. Is there an assumption that all of the planning areas have the same factors driving sage-grouse management and the same environmental conditions and constraints affecting the ecology of sagegrouse regardless of management zone and planning area?</p>		
DR-MTDK-BL-13-0426-54	NEPA	<p>COMMENT: Under Executive Order No. 2-2013, Montana Governor Bullock mandated the establishment of a Greater Sage-grouse Habitat Conservation Advisory Council with a stated purpose "to gather information, furnish advice, and provide to the Governor recommendations on policies and actions for a state-wide strategy to preclude the need to list the Greater Sage-grouse under the Endangered Species Act (ESA), by no later than January 31, 2014." Will this advisory council supplant the Montana Sage Grouse Working Group (and/or local working groups) or will these groups continue to address sage-grouse management? In addition, please clarify BLM's anticipated role in recognizing and/or adopting recommendations of the advisory council as part of revisions to the draft RMP/EIS.</p>	N	<p>Thank you for your comment.</p> <p>Please see Chapter 4 for the environmental consequences and Section 1.5 and Chapter 5 for discussions of inconsistencies between the Proposed RMP and county or local plans.</p>
DR-MTDK-BL-13-0426-55	Wildlife	<p>COMMENT: The DEIS fails to discuss the assumed relationship of sage-grouse and sage-grouse habitat in MZ1 (as discussed throughout Chapter 3) compared to the Billings/Pompey's Pillar planning area. Most of the cited references that address effects of oil and gas development on sage-grouse have been conducted in the southeast Montana and Wyoming in the area of MZ1 where intensive development has been ongoing for decades. Ramey et al (2011) report that: "Current stipulations and regulations for oil and gas development in sage-grouse habitat are largely based on studies from the Jonah Gas Field and Pinedale Anticline. These and other intensive developments were permitted decades ago, using older, more invasive technologies and methods. The density of wells is high, due to the previous practice of drilling many vertical wells to tap the resource (before the use of directional and horizontal drilling of multiple wells from a single surface location became widespread), and prior to concerns over sage-grouse conservation. These fields and their effect on sage-grouse are not</p>	n	<p>Thank you for the comment.</p> <p>Habitat in MZ1 is comparable throughout the Eastern Montana and NE Wyoming area. The Billings Field Office only has a small area south of Bridger, MT. to the Wyoming state line, that is within MZ2. BLM considered that habitat is very similar between the two management zones and analyzed them as one entity for consistency.</p> <p>Currently, a research project on sage-grouse in MZ2 is being conducted. Local management considerations will be developed based on the findings of this research.</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		necessarily representative of sagegrouse responses to less-intensive energy development. Recent environmental regulations and newer technologies have lessened effects to sage-grouse. "In addition, Taylor et al (2007) analyzed six oil and gas development areas in Wyoming with various degrees and ages of activity to determine sage-grouse population trends relative to intensity and timing of oil and gas development. They report that: Sage-grouse population trends are consistent among populations regardless of the scope or age of energy development fields, and that population trends in the six development areas mirror trends state-wide; Application of the BLM standard sage-grouse stipulations appear to be effective in reducing the impact of oil and gas development on male-lek attendance; Male lek attendance in areas that are not impacted by oil and gas development is generally better than areas that are impacted; Displacement from impacted leks to non-impacted leks may be occurring; research is needed to assess displacement and its implications for developing sage-grouse conservation strategies; Lek abandonment was most often associated with two conditions, including high density well development at forty-acre spacing (sixteen wells per square mile), and regardless of well spacing when development activity occurred within a the quarter-mile lek buffer; Extirpation of sage-grouse has not occurred in any of the study areas; Long-term fluctuations in sage-grouse population trends in Wyoming reflect processes such as precipitation regimes rather than energy development activity; however, energy development can exacerbate fluctuations in sage-grouse population trends over the short-term.		
DR-MTDK-BL-13-0426-56	Wildlife	COMMENT: The sheer length and disorganization of Chapter 4 (e.g., weaving among alternatives, topic areas, cumulative effects, etc.) makes it virtually impossible to discern the crux of issues related to sage-grouse populations in the Billings/Pompey's Pillar planning area. What are the potential impacts to sage grouse populations within the Billings/Pompey's Pillar planning area due to each of the Alternatives examined as a function of proposing different land classifications and various NSO/CSU restrictions associated with those classifications? It is evident that the population status of sage-grouse in the planning is not well known. Are current populations increasing, decreasing or remaining stable? Without a clear description of the existing sage-grouse resource within the planning area, it is impossible to assess the predicted effects of various management alternatives on sage-grouse populations. Is the preferred alternative expected to result in populations that are larger, smaller, or remain at current level? How would this differ among alternatives?	n	Refer to pages 3-85 through 90 for a summary of sage grouse populations, habitat, and threats. Fluid Minerals impacts to wildlife are described on 4-246 and Section 4.3.1.1.2, pages 4-422 to 4-425 and in Cumulative Impacts, Section 4.6.4, pages 4-624 to 4-615. Impacts from Wildlife Habitat and Special Status Species Management in Alternative D "Preferred Alternative" are described in Section 4.2.7.6.4 on pages 4-280 and 281.
DR-MTDK-BL-13-0426-57	Wildlife	COMMENT: Chapter 3 and the impact discussion in Chapter 4 addressing predicted impacts to sagegrouse, appears to rely solely upon on research conducted in MZ1, an area that encompasses sagegrouse habitats in large areas of Montana, Wyoming, and the Dakotas. In so doing, the DEIS fails to	n	Habitat in MZ1 is comparable throughout the Eastern Montana and NE Wyoming area. The Billings Field Office only has a small area south of Bridger, MT. to the Wyoming state line, that is within MZ2. BLM considered that habitat is very similar between the two management zones and analyzed them as one

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		address the cumulative effects of land management on sage-grouse projected to occur within the Billings/Pompey's Pillar planning area. Rather it relies on the broad discussion of MZ1 and MZ2. Moreover, this section repeats much of the material addressed in Chapter 3. MZ1 is extensively referred to in Chapter 3; however, BLM fails to address the relationship of sagegrouse and their habitat in MZ1 to the BLM planning area. From the text in the DEIS, it appears that MZ1 is thought to be important for sage-grouse management; however, there is no reference to MZ1 in the cumulative effects section. Why does Chapter 3 have a section dedicated to MZ1 but impacts of the proposed Billings/Pompey's Pillar management actions are not addressed relative to MZ1? The section on cumulative impacts would be an ideal place to address the relationship among planning and management activities in MZ1 and MZ2 and the Billings planning area. At a minimum, the Billings DEIS needs to address the potential cumulative effects of the proposed planning activities in the Miles City and Hi Line planning areas as they relate to the Billings/Pompey's Pillar planning area.		entity for consistency. From the DRMP page 3-86, - "descriptions of MZ1 are mostly the same as those that would be described for the northern portion of MZ2 found in the planning area." Currently, a research project on sage-grouse in MZ2 is being conducted. Local management considerations will be developed based on the findings of this research. Text has been added to Chapter 4 to address cumulative impacts with regards to MZ1 and MZ2 - Billings Field Office.
DR-MTDK-BL-13-0426-58	Livestock Grazing	While grazing may have the potential to affect sage-grouse habitat; the DEIS fails to discuss how sage-grouse habitat and displacement of sage-grouse have been affected by grazing practices in the planning area or even the broader region of MZ1 and MZ2. The revised planning documents must evaluate the cumulative effects of livestock grazing on public and private land on sage-grouse and their habitat.	n	In response to your comment, the text in Section 4.2.7.7 of the Proposed RMP and Final EIS has been expanded to clarify the discussion of cumulative effects to the greater sage grouse within MZ1 and MZ 2.
DR-MTDK-BL-13-0426-59	Oil and gas	COMMENT: This statement is based upon the assumption that all oil and gas activities would involve "full-scale" development. "Full-scale" development needs to be identified in terms of well density and other disturbance factors. Is all future development in the planning area expected to be full-scale - "full-scale in terms of the Pinedale Anticline or Jonah? These development areas are profound anomalies within the context of typical development throughout most of the Rocky Mountain region and we strongly object that they are being used as a baseline for examining potential development in other areas, particularly those in the Billings FO. The revised planning documents must base their analysis upon what has typically occurred within THIS planning area.	n	Thank you for your comment. The RFD for the B&PPNM plan revision is 4 wells per year occurring on BLM managed federal mineral estate per year. There are no high potential oil and gas development areas occurring in the federal mineral estate. Full-scale would be four wells per year.
DR-MTDK-BL-13-0426-6	Wildlife	Most of the conventional literature regarding sage-grouse starts with the assertion that -" 60% of historic range has been lost. This is based on work done by Schroeder et al in 2004, and has become the cornerstone of mainstream sage-grouse research. It too is at a 1:2,000,000 scale and provides the basis for much of the US Fish and Wildlife Service (FWS) and BLM policy regarding sage-grouse. Of great concern, however, is the fact that this scale provides wholly unsuitable data when conducting any analysis or planning at FO level. The most recent paper by Knick et al concluded that sage-grouse lek abandonment will occur with as little as 3% human disturbance with a 3-mile radius of a lek. Unfortunately, their methods apply cumulative human impacts over the past 100	n	Before beginning the B&PPNM RMP/EIS and throughout the planning effort, the BLM and the Forest Service considered the availability of data from all sources, adequacy of existing data, data gaps, and the type of data necessary to support informed management decisions at the land-use plan level. The data needed to support broad-scale analysis of the Billings Field Office planning area are substantially different than the data needed to support site-specific analysis of projects. The RMP/EIS data and information is presented in map and table form and is sufficient to support the broad scale analyses required for land use planning. The BLM and the Forest Service used the most recent and best information

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		<p>years to a static snapshot of lek status (active or abandoned). In other words, no consideration was given to the timing of the human disturbance with respect to the status of a lek in question. It is assumed that any lek abandonment was due to cumulative human impacts</p>		<p>available that was relevant to a land-use planning-level analysis including the Baseline Environmental Report (BER; Manier et al. 2013). The BER assisted the BLM and the Forest Service in summarizing the effect of their planning efforts at a range-wide scale, particularly in the affected environment and cumulative impacts sections. The BER looked at each of the threats to greater sage-grouse identified in the Fish and Wildlife Service’s “warranted but precluded” finding for the species. For these threats, the report summarized the current scientific understanding, as of report publication date (June 2013), of various impacts to greater sage-grouse populations and habitats. The report also quantitatively measured the location, magnitude, and extent of each threat. These data were used in the planning process to describe threats at other levels, such as the sub-regional boundary and WAFWA Management Zone scale, to facilitate comparison between sub-regions. The BER provided data and information to show how management under different alternatives may meet specific plans, goals, and objectives.</p> <p>Additionally, the BLM and the Forest Service consulted with, collected, and incorporated data from other agencies and sources, including but not limited to the U.S. Fish and Wildlife Service and Montana Fish, Wildlife and Parks. As a result of these actions, the BLM and the Forest Service gathered the necessary data essential to make a reasoned choice among the alternatives analyzed in detail in the DRMP/EIS, and provided an adequate analysis that led to an adequate disclosure of the potential environmental consequences of the alternatives see Chapter 4. As a result, the BLM and the Forest Service have taken a “hard look,” as required by the NEPA, at the environmental consequences of the alternatives in the DRMP/EIS to enable the decision maker to make an informed decision. Finally, the BLM and the Forest Service have made a reasonable effort to collect and analyze all available data.</p> <p>The requisite level of information necessary to make a reasoned choice among the alternatives in an EIS is based on the scope and nature of the proposed decision. The baseline data provided in Chapter 3 and various appendices including in the B&PPNM RMP/EIS is sufficient to support, at the general land use planning-level of analysis, the environmental impact analysis resulting from management actions presented in the DRMP/EIS.</p> <p>A land use planning-level decision is broad in scope and, therefore, does not require an exhaustive gathering and monitoring of baseline data. Although the BLM and the Forest Service realize that more data could always be gathered, the baseline data provides the necessary basis to make informed land use plan-level decisions. Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions (BLM Land Use Planning Handbook H-1601-1, Chapter II, A-B at 11-13 and Chapter IV, B at 29; Forest Service Handbook 1909.12 – Land Management Planning).</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
				The BLM and the Forest Service will conduct subsequent project-specific NEPA analyses for projects proposed for implementation under the land use plan, which may include but are not limited to fuels treatment, habitat restoration, [etc.; list others as applicable]. The subsequent NEPA analyses for project-specific actions will tier to the land-use planning analysis and evaluate project impacts at the appropriate site-specific level (40 CFR 1502.20, 40 CFR 1508.28). As required by NEPA, the public will have the opportunity to participate in the NEPA process for site-specific actions.
DR-MTDK-BL-13-0426-60	Oil and Gas	Page AB-9, "In cases where Federal oil and gas leases have been issued without adequate stipulations for the protection of sage-grouse or their habitats being provided in the applicable RMP decision, as revised or amended, include mitigation measures and conservation actions as permit Conditions of Approval (COAs) when approving exploration and development activities through completion of the environmental record of review (43 CFR 3162.5), including appropriate documentation of compliance with NEPA."COMMENT: Please explain in more detail how COAs would correspond with the annotation made in Table 2-5 "Lease Terms and Stipulations by Alternatives" that it applies to "New Oil and Gas Leases". Based on the paragraph above, it appears that COAs may apply to current lease areas as well as "new oil and gas leases"? Please explain in more detail how the information in Appendix AB corresponds to the specified lease terms and conditions, and what this would mean to lessees/producers. We also recommend that BLM clearly articulate how it intends to ensure such COA's would be administered to preserve valid existing lease rights.	n	Thank you for your comment. This will be clarified in the document.
DR-MTDK-BL-13-0426-61	Wildlife	This section includes questions generated from a comparative review of the HiLine, MCFO, and Billings/Pompey's Pillar DEISs, with a particular focus on the various management restrictions within sage-grouse habitat. Tables 1 and 2 serve as summaries of main sage-grouse management parameters and management prescriptions included in each of the three referenced RMP/EIS documents and serve as reference points for several specific comments presented below: Table 1 Sage-Grouse Management Parameters on BLM-Administered Land Planning Area BLM Sage Grouse Habitat Estimated # of Leks BLM Sage-Grouse Habitat Acreages General Habitat Areas Protection-Priority Areas Restoration Areas/Source Population Area Miles City Field Office 2.5 Million acres 386 leks of unconfirmed status, 455 confirmed active leks, 33 extirpated leks, and 19 confirmed inactive leks. BLM Oil/Gas Lease(1): 800,000 acres BLM Surface: 400,000 acres BLM Oil/Gas Lease: 1,403,000 acres BLM Surface: 792,000 acres BLM Oil/Gas Lease: 289,000 acres* BLM Surface: 109,300 acres** Of these totals, 8,000 acres of Oil/Gas Lease and Surface are part of the Source Population Area. HiLine Unknown (2) 154 leks BLM Administered Federal Mineral Estate (BLM-FME) (1): unknown (2) acres BLM Surface: unknown acres (2)Grassland Bird/Greater Sage	n	Thank you for your comment. The categories of "Federal mineral estate" and "Oil and Gas Lease" are not intended to represent the same classification. Federal mineral estate includes all federal mineral estate, both surface and subsurface (Split estate –refer to Glossary definition) and the "Oil and Gas lease" category describes either leasable Federal mineral estate or actual leased acreage. ???? Acreage from Chapter 3, Page 3-85 (Table 3-29), reports a total of 336,479 acres in Billings Field Office. This acreage was prepared from DRAFT Montana Fish, Wildlife, and Parks sage grouse habitat data several years ago. This data will be edited to reflect more recent data from Table 2-1. Acres of various classes of sage-grouse habitat within Billings Field Office; and Number of leks on BLM-administered lands in the planning area are described on pages 3-85 and 86 and Table 2-1.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		<p>Grouse Priority Area: BLM-FME: 1,028,661 BLM Surface: 930,265 acres Sage Grouse Priority Protection Area: BLM-FME: 318,143 acres BLM Surface: 298,772 acres BLM-FME: Unknown acres (3) BLM Surface: 46,786 acres Billings/Pompey's Pillar 336,479 Acres (4) 19 active leks on BLM Surface (8 inactive) 30 lek sites are on FME. BLM-FME: 116,452 acres BLM Surface: 78,575 acres BLM-FME: 191,543 acres BLM Surface: 154,140 acres BLM-FME: 63,437 acres BLM Surface: 45,555 acres (1) See comment below for questions concerning "Oil and Gas Lease" and Federal Mineral Estate" terminologies. (2) See comment below for a question concerning total BLM acres of sage-grouse habitat within the HiLine Planning Area (3) See comment below for a question concerning total BLM acres of "Federal Mineral Estate" within Restoration Areas (HiLine RMP/EIS) (4) See comment below regarding the total acreage reported in Chapter 3, Page 3-85 (Table 3-29) of the Billings/Pompey's Pillar RMP/EIS. Table 2 Management Prescriptions for Three BLM Planning Areas in Montana BLM Sage-Grouse Habitat Categories Planning-General Habitat Acres-Nesting/Brood Rearing-Protection-Priority and Source Population-Restoration Areas Miles City (1)-Surface-disturbing activities would be avoided within 2 miles of leks, CSU stipulations within 2 miles of leks, Low-voltage power lines buried within 2 miles of leks-Surface-disturbing activities would be avoided within 4 miles of leks. Timing restrictions (BMP Appendix)-NSO-CSU stipulations HiLine (2)-NSO within 1 mile of leks-CSU stipulations -NSO ----Billings/Pompey's Pillar-CSU stipulations, NSO on "new oil and gas leases" within 0.6 miles of a lek, Timing restrictions within 3 miles of leks (March 1 - June 15)-Timing restrictions within 3 miles of leks (Mar. 1 - June 15), CSU stipulations, Geophysical exploration allowed on existing roads, Timing-restrictions (Mar. 1 - June 15) within 4 miles of leks-NSO-NSO on "new oil and gas leases" within 0.6 miles of a lek, Timing restrictions within 3 miles of leks (Mar. 1 - June 15), CSU stipulations, Geophysical exploration allowed on existing roads, Timing-restrictions (Mar. 1 - June 15) within 4 miles of leks (1) Miles City indicates that sage-grouse protection areas will not be designated as ACECs and no compensation for impacts would be required in sage-grouse impacts (which may conflict with CSU stipulations) (2) Hi Line also has NSO restrictions in sage-grouse wintering areas from Dec. 1 - March 31. Comment: As summarized in Table 1 above, when discussing specific acreages of sage-grouse habitat that would fall under various management restrictions (based on the respective Preferred Alternatives), the Billings/Pompey's Pillar DEIS and the HiLine DEIS reference BLM Administered "Federal Mineral Estate" and "Surface" under each main sage-grouse management classifications (e.g., General Habitat, Priority Protection Area, Restoration Area). However, the MCFO DEIS references "Oil and Gas Lease" and "Surface" as the two main categories of BLM administration. Please clarify the questions below: Are the categories of</p>		

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		<p>"Federal Mineral Estate" and "Oil and Gas Lease" intended to represent the same classification? If not, please explain any difference. If yes, please clarify terminologies among all Montana BLM RMP/EISs to aid the public (and potential operators) in consistently interpreting the proposed sage-grouse habitat restrictions. Are all proposed surface management restrictions applied equally regardless of whether the BLM Administered Lands in question are "Surface or "Federal Mineral Estate" and/or "Oil and Gas Lease"? Is it assumed that if a particular "Surface" acreage is under BLM Management then the mineral estate within that same acreage is also under BLM Administered "Federal Mineral Estate" and/or "Oil and Gas Lease" as well? Comment: Are the 2.5 million acres reported as sage-grouse habitat under BLM Administration (within the MCFO planning area) a summation of the "Oil and Gas Lease" acreages reported for the three main management categories reported in MCFO DEIS Table 2.22? See summary in Table 1 above (General Habitat Acres [800,000 acres], Protection-Priority Areas [1,403,000 acres] and Restoration Areas and Source Population Area [289,000 acres]). Comment: Three appendices within the MCFO DEIS address management practices to avoid, minimize, and compensate for losses to sage-grouse habitat (i.e., BMPs Appendix, Minerals Appendix, and Fish and Wildlife Appendix). These appendices list specific practices and restrictions that apply to oil and gas development in sage-grouse habitat but do not specify which practices are stipulations that must be met for leasing and development. It is difficult to determine what an oil and gas operator will have to comply with relative to actions in sage-grouse habitat. Table 2 (below) summarizes what appear to be the primary management restrictions, but they have been summarized from various sections of the DEIS and may not be comprehensive. The MCFO DEIS (and the HiLine and Billings/Pompey's Pillar DEISs accordingly) must identify required stipulations and guidelines (are these the same as BMPs?) in a comprehensive table within either DEIS Chapter 2 or 3. Comment: Two of the three DEISs indicate that CSU stipulations will be developed for activities in various sage-grouse habitats; however, it is unclear in the MCFO DEIS how CSU stipulations will be developed. By comparison, the HiLine DEIS identifies how CSU stipulations will be developed in Appendix E.5 and the Billings Pompey's Pillar DEIS describes the development of CSU stipulations in Appendix C. Both the HiLine and Billings / Pompey's Pillar DEISs indicate that the proponent must prepare a plan to maintain the functionality of sage-grouse habitat to assist in identifying CSU stipulations. How will CSU stipulations be identified in the MCFO planning area? Comment: Please clarify the total acreage of BLM-Administered acreage of sage-grouse habitat within the Billings/Pompey's Pillar planning area. Chapter 3, Page 3-85 (Table 3-29), reports a total of 336,479 acres. However the total appears to be 371,432 acres when summing the acreages presented in Chapter 2, Page 2-19 (Table 2-1).</p>		

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		<p>Please clarify. Comment: Please clarify and/or provide the total BLM acres of "Federal Mineral Estate" that would be included within the "Restoration Areas" category for the HiLine planning area. This information appears to be missing in the HiLine DEIS. Comment: Please clearly depict what management restrictions/prescriptions would be required for the two proposed ACECs within the HiLine planning area; specifically the Grassland Bird/Greater Sage-Grouse Priority Areas ACEC (461,220 acres) and Greater Sage-Grouse Protection Priority Area ACEC (930,265 acres). Jointly the two ACECs comprise over 1.39 million acres and represent an extensive land area. Comment: To understand the effects of proposed sage-grouse management in the planning areas for the three BLM field offices, the sage-grouse resource (i.e., populations and habitat) that would be affected by various management directives need to be identified. The DEISs for the three planning areas do not present sage-grouse estimates for population sizes (see Table 1) so other metrics that represent the sage-grouse resource which will be subject to the proposed management directives need to be presented. To better understand the sage-grouse resource that would be subject to the management prescriptions identified in the three DEISs, we request the following information be clearly stated in each DEIS's Chapter 3 -" Existing Environment: Acres of various classes of sage-grouse habitat within each planning area on BLM administered lands; and Number of leks on BLM-administered lands in the planning area. Comment: As shown in Table 2 above, the planning prescriptions for surface occupancy and controlled surface use for the three planning areas (MCFO, HiLine, and Billings/Pompey's Pillar) are variable which raises questions of how NSO restrictions were determined. Based on review of the three draft planning documents, it appears that all three relied on same data sources to address impacts of oil and gas development on sage-grouse. All planning areas have similar sage-grouse habitat conditions (i.e., all are in Sage-Grouse Management Zone 1), and all are anticipating some level of oil and gas development. It is unclear how different NSO restrictions around leks were developed. NSO restrictions around leks vary among the planning areas, with buffers around leks being 0.6, 1, 2, and 3 miles. Why are these NSO restrictions different for the three planning areas when they all relied on similar sources to define potential impacts associated with oil and gas development? Does sage-grouse vulnerability to impact or population viability differ among BLM planning areas? Additional Literature Cited Ramey, R., L. Brown, and F. Black goat. 2011. Oil and gas development and greater sage-grouse (<i>Centrocercus urophasianus</i>); A review of threats and mitigation measures. <i>The Journal of Energy Development</i>: 35(1); 49-77. Taylor, R., M. Dzialak, L. Hayden-Wing. 2007. Greater sage-grouse populations and energy development in Wyoming. Accessed March 2013 at http://bogc.dnrc.mt.gov/reports.asp</p>		

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
DR-MTDK-BL-13-0426-7	NEPA, Oil and Gas	BLM recognized the intent of the both Phases I and II of the EPCA review when it issued Instruction Memorandum 2003-233, Integration of the Energy Policy and Conservation Act (EPCA) Inventory Results, into the Land Use Planning Process. Consequently, BLM Field Offices are now required to review all current oil and gas lease stipulations to make sure their intent is clearly stated and that stipulations utilized are the least restrictive necessary to accomplish the desired protection. Moreover, the IM directs that stipulations not necessary to accomplish the desired resource protection be modified or eliminated during the planning process. Since the purpose of integrating the EPCA results into planning is intended to determine whether existing resource protection measures are inadequate, adequate or excessive, we recommend the BILLINGS BLM reevaluate its management decisions accordingly and make requisite changes to the FEIS. If BLM decides not to reevaluate its decision, we specifically request a response from BLM in the Final EIS explaining why this was not done	n	Thank you for your comment. Oil and gas stipulations have been reviewed and evaluated by Montana State Office Oil and Gas staff for prior to release of the DRMP.
DR-MTDK-BL-13-0426-8	NEPA	We also point out that documentation of the need for change is required by BLM's 1601 Planning Handbook at § VI, Determining if New Decisions are Required, Part D, Documenting the Determination to Modify, or Not to Modify, Decisions or NEPA Analysis, which directs that "it is important to document decisions to modify or not modify the land use plan or NEPA analysis when these decisions are reached as part of the formal land use plan evaluation process (Section v). (Emphasis added) We ask BLM to explain its rationale to exclude this requirement from the DEIS in final EIS	N	Thank you for your comment. The lifespan of a RMP/EIS is 15-20 years. When the BLM Billings Field Office began the RMP revision process in 2008, the 1984 RMP was 24 years old. Since the Record of Decision was signed for the existing RMP in 1984, new data have become available, and laws, regulations, and policies regarding management of these public lands have changed. In addition, decisions in the existing plan do not satisfactorily address all new and emerging issues in the Planning Area. These changes and potential deficiencies created the need to revise the existing plan.
DR-MTDK-BL-13-0426-9	Oil and Gas	Therefore, since the purpose of integrating the EPCA results into planning is intended to determine whether existing resource protection measures are inadequate, adequate or excessive, it is even more crucial that the BFO reevaluate its management decisions accordingly and make requisite changes to the FEIS. Discussion of the specific requirements of a resource to be safeguarded, along with a discussion of the perceived conflicts between it and oil and gas activities must be provided along with an analysis of available mitigation measures. Clearly, an examination of less restrictive measures must be a fundamental element of a balanced analysis and documented accordingly in the FEIS	n	Thank you for your comment. BLM has developed a range of alternatives to reflect resource conservation as well as commodity use. The BLM is required to adopt the least restrictive development stipulations that will satisfy the resource objectives.
DR-MTDK-BL-13-0430-1	Recreation	The RMP's four alternatives would each close a certain number of acres to recreational shooting ranging from 11,348 acres to 34,109 acres. The only reason given for the closures is a generalized statement that it is for "resource and safety concerns." We can surmise that some of the areas are closed because they might have developed recreation sites or resource values that are especially vulnerable. The RMP provides a Detailed Table of Alternatives (Resource Uses and Support) on Page 2-126 that displays how each of the alternatives would affect recreational shooting by acres opened or closed for each of the ACECs and other management units. However, there is no	n	Thank you for your comments and concerns. Table 2-6.2 does provide rationale in text form for those areas which had restrictions proposed for them. However, as a result of your concerns, the tables have been revised to better reflect the decision and the difference in acreages involved. A note has been included in Table 2-62 with references to other decision sections (Appendix E)

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		substantive information that accompanies the table to explain the reason for each of the proposed closures and the variance in acreage among the alternatives.		
DR-MTDK-BL-13-0430-2	Recreation	The 17 Mile site, an isolated tract of 2,080 acres fronting on a public road, is one of only a small number of recognized and supported informal, but intensively used, recreational shooting areas in all of the planning area. It is described as having no other recreational use and no commercial grazing. At the present time it is the only BLM identified recreational shooting site on public lands within reasonable proximity to Billings for more concentrated recreational shooting to take place. If a recreational shooting inventory of other public lands was conducted, there is the potential for additional sites. However, even though other sites may be discovered, the 17-Mile site deserves added protections for its primary use as a recreational shooting site. The area is not identified for right of way exclusion or avoidance thus making its continued and current exclusive use for recreational shooting vulnerable to a ROW grant that could result in it being closed to shooting. The uniqueness (Ref. p. 3-193; Maps 95 and 96) of use of 17 Mile in the Billings area, even the Billings District, argue for consideration as a SRMA rather than an ERMA. ERMA recreation management actions are, "... limited to only those of a custodial nature."	N	<p>Thank you for your comment. Please refer to Chapter 2-62 and maps 102-105 for the amount of area open in the Billings Field Office for target shooting, including the 17 Mile Area – as it can be seen the public is not overly restrained from target shooting in the BIFO lands, as consistent with the Hunting, Fishing and Shooting Sports Roundtable Memorandum of Understanding (MOU) and EO 13443.</p> <p>In regards to the designation of the 17 Mile Area as a SRMA and not as an ERMA, this action is not in accordance with BLM IM 2011-106 and 43 CFR 8364 and 43 CFR 8365. The BLM's policy prohibits the agency from directly operating shooting ranges, or from issuing new leases of public lands for shooting ranges, principally because of the agency's potential liability related to lead contamination of the environment. New shooting ranges cannot be authorized by any type of lease or other land use authorization that does not transfer fee title to the applicant.</p> <p>The map inconsistency noted between Maps 95 and 96 with Table 2-62 has been remedied.</p>
DR-MTDK-BL-13-0430-3	NEPA, Travel mngt	We appreciate the recognition of Executive Order 13443 'Facilitation of Hunting Heritage and Wildlife Conservation" and the direction it provides to Federal land managers to work with state wildlife agencies, private landowners and other partners to improve hunter access and availability of public lands for hunting. Unfortunately, there are no specific examples of how this RMP would actually implement the Executive Order. The RMP proposes to close 377 miles of roads to public use. There is nothing in the RMP that discusses what, if any, impacts that will impose on hunter access, particularly the closure of roads that have been traditionally used by hunters. If the Executive Order is to be acknowledged as a guiding force for hunter access and opportunities, then the RMP should have provided an analysis of how the impact of these closures would affect hunters.	N	<p>Thank you for your comment. Implementation of any of the acts would be addressed at implementation level planning. Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS. In regards to the specific route designations you support, the RMP has a range of possible decisions. The BIFO staff has reviewed your recommendations and its own route inventory data, the Transportation and Travel Management Manual 1626, and has chosen Alternative D as its preferred balance to establish a long term, sustainable, multi-modal system of roads, primitive roads, and trails that addresses public and administrative access needs to and across BLM – managed lands, best supports the agency's planning goals and objectives to provide resource management, and to manage travel and transportation on public lands in accordance with law, Executive Orders, Proclamations, and policy.</p>
DR-MTDK-BL-	Travel mngt	Concerning Road closures, there are many roads that could be closed that the public has no access to because they cross private land to get to the property.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
13-0431-1		Roads I would suggest closing are: GC1028, 1027, 1029, GC1004, GC1062, GC1016, GC1060 in section 30, but keep it open in sec 25, TWP 8S, RGE 20E, GC 1061, GC1048 in section 2 except where giving access to private land in section 11 to the south.		under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS. In regards to the specific route designations you support, the RMP has a range of possible decisions. The BIFO staff has reviewed your recommendations and its own route inventory data, the Transportation and Travel Management Manual 1626, and has chosen Alternative D as its preferred balance to establish a long term, sustainable, multi-modal system of roads, primitive roads, and trails that addresses public and administrative access needs to and across BLM –managed lands, best supports the agency’s planning goals and objectives to provide resource management, and to manage travel and transportation on public lands in accordance with law, Executive Orders, Proclamations, and policy.
DR-MTDK-BL-13-0431-10	Social/econ	I am not sure what Social-economic model was used for evaluating management of this area, but it needs to include the numerous private land holding here and future homes for many people. It is not just a change of managing the grouse that needs to be the focus and how it reduces grazing, but how someone who owns property there and has plans to retire or build a cabin loses the opportunity to do so or his costs are greatly increased because of right of way issues or lack of fire management. All of us who own property there can be affected by your plans for this area and the actual economic costs need to be factored in.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS. For economic impacts due to sage grouse, please see the socio-economics section in chapter 4.
DR-MTDK-BL-13-0431-11	Travel mngt	Many of the roads which are listed for closure are routinely traveled by citizens, officials, and emergency vehicles that require access to perform official duties. Adding an additional layer of restrictions on this type of travel could effect human concerns, and create adverse conditions on the BLM property's . The listed road closures in the preferred plan would deny access to several private property's and some historical reference point.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS.
DR-MTDK-BL-13-0431-2	Travel mngt	Roads that should be kept open with no additional management are: GC1002, 1003, 1010, 1009, 1008, 1047, 1070, 1001 from the Gove Creek Road to the Ruby Creek Road, 1070, 1031 from the Grove Creek road to the river, as well as 1034 to 1035 to the private land. I strongly disagree with any management control over roads that give private individuals access to their property. Any management plans should never include closing roads that make someone’s land become landlock. To insure that that does not happen, I recommend the above roads be open all vehicles with no administrative management.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS. Please refer to map 150.
DR-MTDK-BL-13-0431-3	ACEC	Roads that would be good to remain open with additional management are 1013, 1012, 1015, 1074, 1067, 1073, 1072, 1078, 1068, 1066, Administrative use only roads would be 1044, 1011, 1042, 1043, 1033, 1038, 1034 past 1035, 1037, 1038, 1032, 1077. Some roads that give the public access to other public land, namely GC1024, 1050, 1051 & 1052 should remain open to the state public land, with additional management. These might be managed as ATV or	N	Thank you for your comments. In specific regards to the ability of BLM to designate routes where historical use has been occurring, please see the discussion of RS-2477 in the RMP (chapter 1, section 1.4.1.5).

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		4x4 only access. For that matter 1048, might also be good for ATV use as well. Finally, concerning roads, many roads, including the roads up into the Spires and the roads to the Dillworth homestead, Post Office and headquarters, predate the BLM and were public roads before they were BLM. Before roads area closed, the BLM should inventory where they have the authority over the road or whether the road is public and has been since the 1800's. Concerning this issue, the earliest survey of the Meeteetse Trail does show a road going up into the spires. For this reason, and because of the recreational opportunities, this road should be left open or allowed to be used for ATV use up to the cabin		In regards to specific routes and their decisions, the BLM staff used an interdisciplinary approach which is described in detail in Appendix O, and the inventory sheets for individual routes are available for review.
DR-MTDK-BL-13-0431-4	ACEC,	I have problems with the conflicts being created by putting the Grove Creek area into an ACEC. This area is very small and not significant enough to warrant critical environmental concerns. Sagegrouse have flourished here with the current road densities and even allow recreational hunting because of the health of the population.	N	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the B&PPNM RMP/EIS. Please see Appendix E for the resource evaluation on this ACEC. Also please refer to FLPMA Sections 103, 201, and 202 for the direction which it provides regarding the high priority BLM is to give in the designation and management of ACECs.
DR-MTDK-BL-13-0431-5	Cultural	Another issues is that The Native American historical sites of more significance than just hunting camps have not been established. As one who has extensively explored this area, I have never seen any significant artifacts. I would be surprised as well that these public land areas were used much by them; they probably camped along Grove Creek or Dilworth Creek at the springs and flowing water areas which are now on private land. Look at the study conducted by Bales and Strait of Ethno science, Inc in 2003. They only found evidence of hunting camps, tepee rings and rock cairns that may have been from Native Americans or early settlers.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS.
DR-MTDK-BL-13-0431-6	Social/econ	this area has had huge settler, miner and rancher activity since the 1800's, including a post office and stage coach route. It was used to access the National Forest area (before it was National historical usage of this area and precludes the publics continued enjoyment. 4 , it would have a huge impact on the private landowners with restricting right of way improvements and acquisition of new right of ways, for power, phone and road access. If no one owned land here, that might be acceptable, but over 30% of the land is privately owned around this proposed ACEC.	n	Thank you for your comment.
DR-MTDK-BL-13-0431-7	Fire Ecology and Managemement	the concerns about fire management and the issues of being able to fight fires with bulldozers may seem good for grouse, but it is inappropriate to allow fires to burn and not quench them as quickly as possible when you have so many private landowners in this area whose property would be damaged by fires. All means to stop fires needs to be exercised. This also would help protect the sage	n	In response to your comment, the text in Alternative D for the Grove Creek ACEC of the Proposed RMP and Final EIS has been revised to state: Wildfire management (natural ignitions) for resource benefit. Full range of fire management activities would be used in ACEC in response to human-ignited fires. Use of heavy equipment and retardant would be avoided unless approved

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		grouse.		by authorized officer
DR-MTDK-BL-13-0431-8	ACEC	Management of this area under ACEC would adversely affect private property owners, as this area is mixed with private property that is being developed.	N	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the B&PPNM RMP/EIS. Please see Appendix E for the resource evaluation on this ACEC. Also please refer to FLPMA Sections 103, 201, and 202 for the direction which it provides regarding the high priority BLM is to give in the designation and management of ACECs.
DR-MTDK-BL-13-0431-9	Fire Ecology and Management	concerning fire management issues, you need to note that the winds are much too strong in this area to permit an "ignore type policy" of fire management. A better alternative would be to allow the local citizen based fire suppression equipment to react and extinguish such fires. This would be a more expedient way of protecting structures dwellings and adjacent lands.	n	In response to your comment, the text in Alternative D for the Grove Creek ACEC of the Proposed RMP and Final EIS has been revised to state: Wildfire management (natural ignitions) for resource benefit. Full range of fire management activities would be used in ACEC in response to human-ignited fires. Use of heavy equipment and retardant would be avoided unless approved by authorized officer
DR-MTDK-BL-13-0432-1	NEPA	The Phillips County growth policy and Land Use Resource Plan is not even listed in the RMP. This indicates that the RMP was not reviewed to see if it was consistent with our policies. The Phillips County Commissioners request that we are cooperators on the step down plans such as the travel plan. We have a vested interest in the roads and should be in on the plan from the beginning. Page 1122 -"Develop a transportation management plan across ownership boundaries in greater sage grouse habitats" BLM only has jurisdiction over BLM lands not private land. We agree with the statement on page 7 issue 10 of the RMP summary, "Management must recognize the economic activities that are dependent on the land and it's natural resources".	N	Thank you for your comment. Phillips County is not located within the Billings Planning Area, it does not border the planning area, and Phillips County is not a cooperating agency on this RMP/EIS. Phillips County had been added to the Billings & Pompeys Pillar National Monument RMP/EIS mailing list.
DR-MTDK-BL-13-0432-2	WSR	Page 7 issue 11 asks the question" how should they (lands with wilderness characteristics) be managed to protect those values?" This question is not really answered, just that Section 202 of the FLPMA requires the BLM to rely on resource inventories in the development and revision of the land use plans including inventory information regarding wilderness characteristics". This doesn't answer how they should be managed . Page 16 "Newly acquired lands would be evaluated to determine if they should be designated as a reserved common allotment." "If a reserve common allotment is designated, an activity plan would be developed that identifies how the allotment would be managed to maintain rangeland health and the procedures for selecting an applicant to use the allotment." Page 16: Allotments within priority habitat areas for sage grouse where grazing preference is relinquished or cancelled would be evaluated in a site specific document to determine if they should be closed to grazing, designated as reserve common allotments or reassigned. We do not agree with	n	Thank you for your comment. The comments made apply to the Hiline RMP and not the Billings and Pompeys Pillar National Monument RMP. For Livestock Grazing alternatives please see table 2-6.2 Livestock Grazing, Thank you for your comments. Please be aware that under the Wild and Scenic Rivers Act, inventory or designation of a river segment neither implies nor gives government control of private lands within the river corridor. Although Congress (or the Secretary of the Interior) could and often does include private lands within the boundaries of a river study or a designated river, management restrictions would only apply to the public lands. The federal government has no power to regulate or zone private lands under the Act. People living within a river corridor would be able to use their property as they had before any W&SR study or designation. The ability of a landowner to buy or sell their property is not affected (it should be noted that WSR designations generally cause property values to remain stable or increase). Land use controls are solely a

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		using reserved common allotments. There is no guarantee that these allotments will be utilized. These allotments should be utilized and not reserved. We have a concern of the allotments being reserved for wildlife only and not utilized for cattle grazing and wildlife as it was intended. Page 35 Wilderness characteristics: "No changes to livestock grazing allocations would occur on any lands managed for wilderness characteristics and all agreements and provisions for maintenance and upkeep of existing range improvements would continue to remain in effect including access to and maintenance of range improvements. New range improvements and land treatments could be allowed provided they meet with the objective of enhancing or restoring those wilderness characteristics being managed for and meet the intent of the visual quality objectives of the VRM class". We agree with this.		matter of state and local zoning; there are no binding provisions on local governments. In the absence of state or local protection provisions, the federal government may enter into compliance measures with landowners through a variety of mechanisms such as purchase of easements, cooperative agreements, exchanges or acquisition of private lands from willing sellers at fair market prices.
DR-MTDK-BL-13-0432-3	Wildlife	Greater Sage grouse priority areas and Greater Sage Grouse protection priority areas should be written the same as the general greater sage grouse areas wording, "Consideration would be given to incorporating site specific greater sage grouse habitat and management objectives as appropriate." Rather than on page 39 and 40 "Site specific greater sage grouse habitat and management objectives would be developed for BLM land and incorporated into respective allotment management plans or livestock grazing permits as appropriate."	n	Thank you for your comment. These pages refer to the HiLine RMP.
DR-MTDK-BL-13-0432-4	Realty, Cadastral Survey, and Lands	Page 38 - "The BLM would consider opportunities to remove, bury or modify existing powerlines. Careful review should be done before considering removing powerlines. This could have a negative impact on adjoining landowners who chose to do future improvements.	n	Thank you for your comment. This language is from the Hi-Line Draft RMP Chapter 2, pages 150, 160, 166, and 167 alternative B-sage grouse PHMAs. The draft Billings RMP does not consider removing, burying or modifying existing powerlines, other than installing anti-perching devices. Your comment is specific to the Hi-Line Draft RMP.
DR-MTDK-BL-13-0432-5	NEPA	Under FLPMA, BLM is required to manage the public lands on the basis of multiple use and sustained yield. 43 USC § 1701(a)(7) (2006) Oil and gas development is a crucial part of the BLM's multiple use mandate and the agency must ensure that oil and gas development is not unreasonably limited in the RMP.FLPMA clearly identified mineral exploration and development as a principal or major use of the public lands. (43 U.S.C. § 1702(1)) To that end, FLPMA requires the BLM to foster and develop mineral activities, not stifle and prohibit such development.	N	Thank you for your comment. The BLM's multiple-use mission and the BLM's obligation to comply with the Federal Land Policy and Management Act of 1976 (FLPMA) and all other applicable laws, regulations and policies are addressed in Chapter 1 of the Proposed RMP/Final EIS. BLM carefully considered the issues brought forward during scoping the public comment period on the draft RMP/EIS and developed alternatives with full consideration of the requirements of multiple use management as described in FLPMA. While FLPMA directs the BLM to provide for multiple use, the BLM still maintains the authority to limit some uses when potential conflicts exist. The RMP/EIS evaluated a range of alternatives that provided for varying degrees of energy development along with other uses. In areas where energy development would conflict with BLM's obligations to protect other resources, BLM considered the impacts of a range of alternatives that included restricting, closing or leaving open specific areas to energy development to the extent necessary to properly balance management of all resources.
DR-MTDK-BL-	Recreation	do not allow any target shooting at any time during the year, as these cause tremendous stress to our wild horses and other wildlife. Shooting is an	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
13-0434-2		endangerment to people besides.		under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS. Please note that on page 2-172 safety is noted as a specific concern and that the closure is only during the period of peak visitation and only in the area where people and horses congregate in close proximity with a potential for both vegetation and topography screening.
DR-MTDK-BL-13-0434-3	WILD HORSES, PMWHR, Travel Mngt	Please set the speed limit of 15 mph to protect our horses and public. A sign clearly stating this should be set on the range.	n	By policy BLM routes have been established at 35 mph. Other routes are set at the posted speed limit set by the State of Montana. In this case the BLM decision in the RMP is found in Table 2.6.3 and the speed limit and rationale is for safety for horses. The speed limit will be 15 mph within the PMWR lands located in T. 8 S., R. 28 E.
DR-MTDK-BL-13-0434-4	WILD HORSES, PMWHR	Please include the Sorenson Extension and the Tony Island Spring and the open meadows. Yes, it will require some work with the National Park Service and the Forest Service.	n	Thank you for your comment.
DR-MTDK-BL-13-0434-5	WILD HORSES, PMWHR	Please preserve our wild horses in their natural habitat.	N	Thank you for your comment
DR-MTDK-BL-13-0436-10	Travel mngt	The entire route from the canyon mouth (PM 1068) and up the hill (PM 1069) and on into Custer NF is through a National Audubon Society Important Bird Area. This is about 2 miles on BLM land. Increased traffic will negatively impact both birds and bird watchers. Bear Canyon IBA: "Ornithological Summary" "Bear Canyon supports breeding populations of more than a dozen species on the Montana Priority Bird Species List. It also has the highest known number of nesting Blue-gray Gnatcatchers among the handful of foothill canyons in the area that constitute the entire range of the species in Montana. The riparian corridor is home to a rich diversity of Neotropical migrants, and the adjacent uplands are inhabited by Common Poor wills, Loggerhead Shrikes, Sage Thrashers, Green-tailed Towhees, Pinyon Jays, and the occasional broods of Greater Sage-Grouse." http://netapp.audubon.org/ibaiSite/2939 Additionally, Bear Canyon has in recent years been a nesting site for peregrine falcons.	n	Thank you for your comment. Travel management will leave the lower Bear Canyon road open to be consistent with Forest Service Travel Management and access to the Pryors. The spring and riparian area at the upper end of Bear Canyon will be closed to motorized travel and open to foot travel only due to erosion and high value wildlife habitat. In regards to the Bear Canyon route, the RMP has a range of possible decisions. In this case, due to the conditions you mentioned the Alternative D has been modified to reflect the current conditions. The route will be designated as "closed" Refer to map 146 While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS
DR-MTDK-BL-13-0436-11	Travel Mngt	Although Graham Trail might be designated for non-motorized use only, we suggest the non-motorized route be Bear Canyon (PM 1068) beginning at the canyon mouth mile from Helt Rd for a number of reasons. 1. It is an ecologically sensitive area and a National Audubon Society IBA, (See above)2. It is part of an increasingly popular hiking trail.3. Bear Canyon is the roughest of the three routes for motorized access.4. Although the route does connect with a motorized	n	In regards to the Bear Canyon route, the RMP has a range of possible decisions. In this case, due to the conditions you mentioned the Alternative D has been modified to reflect the current conditions. The route will be designated as "closed" and as a non-motorized hiking trail. Refer to map 146

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		<p>route on Custer NF, that CNF route is easily motor accessible from Stockman Trail.5. Equestrians, including the Beartooth Back Country Horsemen, are very concerned about safety issues related to mixing horses with motorcycles and ATVs. This would provide separate staging areas and trails for motorized use and horses.6. The inventory sheet for this route (PMI 068) identifies many "special resource" concerns with regard to this route including birds, plants, soils, and archeological sites. The inventory sheet claims "Mitigation will be achieved by employing adaptive management monitoring of the status and/or integrity of the potentially impacted sensitive resources or resource issues identified above as they relate to various factors (e.g. climate cycles, exotic species introduction, visitor use levels [type, intensity, season of use])." This vacuous bureaucratese does not identify any specific action that can or will be taken to mitigate impacts of motorized use on the identified resources.7. The closure of PM 1 071 to public motorized use would do a lot to minimize impacts to Bear Canyon's special resources and make it a better place for hikers and equestrians. There would be public access to Bear Canyon rather than a motorized thoroughfare through Bear Canyon to the rest of Big Pryor Mountain. (Stockman Trail and perhaps Graham Trail would serve that purpose.)8. The Route Inventory Sheet for PM 1068 includes the question: "Can the ... uses of this route be adequately met by another route that minimizes impacts to the sensitive resources identified above ... ?" BLM answers "No." We think the correct answer is obviously "Yes" because Stockman Trail goes to the same place. The only motorized use of this route that can't be met by Stockman Trail is motorized use of this route. (This would be true of any route.) More importantly if non-motorized activity is considered equally with motorized activity, and if a "public use of this route" in the question above is considered to be its use as a hiking/equestrian trail, then that use cannot "be adequately met by another route" because Stockman Trail is a motorized route. Thus the public use is best served by closing the route to motorized use.</p>		<p>Also note that BLM Manual 1626 (Travel and Transportation) specifies that BLM establish a comprehensive program for both motorized and non-motorized travel. This will be done in this RMP</p>
DR-MTDK-BL-13-0436-12	Travel mngrt	<p>This 1 mile route is designated open to motorized use in Alt D. It is currently signed closed to motor vehicles and there is a barricade across the entrance from Horse Haven Rd. This route should be closed to motorized use and designated as a non-motorized route because:1. It is the beginning of an increasingly popular hiking route informally called the "Big Sky Trail." The trailhead is near a good gravel road (Helt Rd) and is accessible without 4WD. Although a moderately high clearance vehicle is desirable for the 1.8 mile distance on Horse Haven Rd, someone with only a highway vehicle could park near Helt Rd and still access the trail with a 1/2 mile extra walk on Horse Haven Rd.2. People do not want to, and should not have to walk a mile on route PM1034 before escaping motorized commotion and impacts3. There is no particular purpose for this to be a motorized route. It dead ends at the CNF</p>	n	<p>In regards to the Bear Canyon route, the RMP has a range of possible decisions. In this case, due to the conditions mentioned the Alternative D has been modified to reflect the current conditions. The route will be designated as "closed" to motorized vehicles but opened specifically for non-motorized use. Refer to map 146</p> <p>Also note that BLM Manual 1626 (Travel and Transportation) specifies that BLM establish a comprehensive program for both motorized and non-motorized travel. This will be done in this RMP.</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		boundary. None of the old tracks north of the fence on Custer NF are legal for either public or administrative motorized use. CNF has a "no motor vehicles" sign at the fence and the gate is locked.4. If motor legal, this route would be an "attractive nuisance" tempting people to illegally drive further on BLM or on north into CNF where extensive illegal driving is possible. Having this route open to motorized use would cause an enforcement problem. How often will the scarce BLM and CNF law enforcement people make the 2 mile round trip in to the fence to check for violations? The fence was cut fall 2012. The cut fence was neither discovered nor repaired by BLM or CNF. Appropriate closure to motorized use at Horse Haven Rd means any vehicle tracks from that point indicate illegal activity, and would thus be a great aid in simple, efficient enforcement of ORV use regulation.5. According to the BLM Inventory Sheet for this route it is a "connector" route and provides property access to the Forest Service. But the 2008 CNF TMP does not designate the tracks north of the fence (on CNF) for either a public or administrative motorized use. So PM1 034 does not "connect" to any other motorized route, public or administrative.6. There are a number of "Special Resource" issues identified in the Inventory Sheet related to this route.7. The inventory Sheet answers "No" to the question, "Can ... uses of this route be adequately met by another route that minimizes impacts ?" This question presumes motorized use. Since it is a dead end motorized route the answer should be "There aren't many motorized uses of the route." However the non-motorized use of this route can be better met by closing it to motorized use.		
DR-MTDK-BL-13-0436-13	Travel mngt	Hikers need to climb over or through the barbed wire fence at the BLM/CNF boundary. It would be good to install a passage suitable for hikers that would not allow passage by 4 WDs and ATVs. Other hiking routes need similar passages. Equestrians are blocked entirely by the locked gate. (Tracks indicate equestrian use of this and nearby routes.) This would be a good place to install a variation of the "Simmons" gate installed in the Grove Creek area to permit equestrian passage but not 4WDs and ATVs. In this case it could be smaller and simpler because there is no need for even administrative vehicles to pass through.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS. This particular comment is not within the scope of the RMP, but it is an implementation decision and can be addressed elsewhere.
DR-MTDK-BL-13-0436-14	Travel mngt	RMP map 146 indicates another roughly parallel route just east of PMI034 making a loop with PMI034. This loop is proposed open to motorized use in Alt D. But this route is mostly rehabilitated naturally and is nearly invisible on the ground. (Did BLM field check this route?) This route should be declared non-existent and removed from BLM maps.	n	Thank you for your comments. The route was identified by the BLM ID team. The team reviewed its earlier work and the determination and has concluded that the route is no longer used by any means of travel, has essentially naturally rehabbed and will be closed to all uses and allowed to completely rehab.
DR-MTDK-BL-13-0436-15	Travel mngt	1. This is a classic example of unneeded parallel routes. For most of its length it is less than 1/2 mile north of, and in sight of Helt Rd. It follows the base of Big Pryor Mountain at the edge of the flat.2. The eastern 1 1/2 (approx.) mile between Bear Canyon and Horse Haven Rd (PM1076), provides a loop hiking route connecting the Bear Canyon and the Rocky Juniper Trails. (This 6 mile loop includes about 1 1/2 mile of motor legal route in Bear Canyon and a short	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		<p>section of Horse Haven Rd., but with this newly proposed motorized route the 6 mile hiking loop would include 3.3 miles of motorized route.)3. There is no need for the slight shortcuts these route segments provide for motor vehicles between Horse Haven, Bear Canyon, Stockman, and Graham. Helt Rd provides the needed access.4. The claim in BLM's Route Inventory Sheets that these routes are not redundant because they have public (motorized) uses that can't adequately be met by other routes is simply false. However the non-motorized public use of especially PM! 076 cannot be met by another route. Demijohn Flat Route PM 1019 (SE from Crooked Creek Rd just south of BLM/CNF boundary.) This route is designated open in Alt 0 , but should be closed to public motorized use and designated for public nonmotorized use. (It could still be an administrative route as in Alt B.)1. This route encourages public motorized access to a culturally sensitive area designated as a National Register District and an ACEC. The preferred alternative proposes expanding the ACEC to include all of the Demijohn Flat National Register District. (E-14) That is a compelling reason to make the route nonmotorized.2. To the NE of this route is the Burnt Timber Canyon WSA. To the SW of this route is a proposed LWC. This route forms the boundary of both. There is no good reason for this motorized corridor. Closing this route to motorized use would allow a 1 1/2 mile common boundary between the WSA and LWC greatly strengthening both.3. This dead end route provides an "attractive nuisance" tempting people to drive beyond the designated end. Monitoring and enforcement will require regular 3 mile round trip excursions from Crooked Creek Rd by BLM LEOs. This is unlikely to happen often due to staff limitations. Efficient, effective monitoring and enforcement would be much easier if PMI 019 was designated non-motorized from the junction with Crooked Creek Rd.4. This route could provide an easy hiking opportunity from Crooked Creek Rd, with a trailhead accessible without 4WD vehicles. Most people can walk. We have seen people in the Pryors park their UTV and go for a hike; it is likely that many riders, as with automobile drivers, would take advantage of the opportunity to complement their ride with a chance to stretch their legs. It is no more logical to assume that ORV users are incapable of walking than it is to assume that people in cars cannot do so. Many people like to walk and visit the Pryors specifically to hike - especially away from motor vehicles; the cultural and archeological values of the Demijohn Flats area are clearly enhanced by the opportunity to experience and contemplate them free from the distraction of vehicle noise and dust. Longer hikes south into the Burnt Timber Canyon L WC (Penney Peak area) are also possible beginning on this route. Two tracks extend south from the "Y" at the end of PMIO19 in section 10. Route PMIO22 goes about a mile SE. This route may need to be designated for administrative use only as in Alt D. Route PM 1021 and PM 1038 (?) wanders about 4 miles SW and S into the LWC. This route should be closed to all</p>		<p>The routes along the base of the mountains (PM 1082, PM 1077, and PM 1076) which you have expressed concerns with have been reviewed by the BLM staff and the determination is that they will remain as closed. The RMP has been altered to reflect this decision. PM 1076 will be specifically designated as a non-motorized trail component.</p> <p>The BLM staff has also reviewed the preliminary decision for PM 1019 (Demijohn Flat Road) and has changed the route status in the RMP from motorized to motorized (administrative access only) and along with PM 1022, PM 1038 and PM 1021 will also be designated as a non-motorized trail for general public use.</p> <p>Regarding the Sykes Ridge routes (PM 1001 and PM 1006) the BLM staff has determined that both route segments will remain as open for motorized use in the RMP.</p> <p>Regarding the potential construction of a non-motorized trail from Bad Pass Highway (state route 37) much of the lands are not managed by the BLM and the decision is beyond the scope of this plan.</p> <p>Regarding the potential for a non-motorized trail using segments of PM 1023 and PM 1024, the BLM has reviewed the preliminary decisions in the RMP and has left all segments of PM 1024 as closed, with the exception of a segment from Red Pryor Road (PM 1025) to the top of the ridgeline (which could potentially serve as a staging area.). The BLM review determined that PM 1023 would remain as "open" in the RMP. BLM will consider further the establishment of a designated non-motorized trail using components of PM 1024 and other routes in its follow-up Implementation Plan. Also note that non-motorized use is allowable on all open motorized, administrative only motorized routes, and closed vehicle routes.</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		<p>motorized use and designated as a non-motorized route. After about 1 mile this route is very badly eroded and not passable with motor vehicles. It should not be driven . It makes a good hike into the LWC and to Penney Peak. Sykes Ridge Route PM1006 and part of PM1001. (Mostly in sections 27 & 28 T9S R28E) PM 1006 is a 2 mile route from PM 1001 and back. The two routes are redundant. One route should be closed. We recommend closing PM 1006 and designating it as a non-motorized trail. The 445 acres inside the loop should be designated and managed as an L WC.1. Since the two routes are redundant closing one will not inhibit motor vehicle traffic up and down Sykes Ridge.2. This would reduce the many resource concerns identified on the Route Inventory Sheet.3. The 445-acre island between the routes, excluded from WSA status could become an LWC.4. The Route Inventory Sheet identifies hiking as a "primary" use of route PM 1006. Access to this hiking route is not difficult for people without a 4WD. It is about a 1-mile cross country hike from paved Highway 37 in BCNRA to this route. Constructing a connecting trail might be considered in the future.5. The Route Inventory Sheet for PM 1006 claims the route is not "redundant" and that its uses cannot be met by another route. But the use of driving up Sykes Ridge can be met by PM 1001. One identified primary use of hiking can be better met if PM 1006 is designated as a non-motorized route. Lisbon - Dandy Mine Loop This is an opportunity to designate a non-motorized loop route. (We can't determine all the BLM route inventory numbers from the BLM map. The loop includes routes PM 1023 and PM 1024. The loop is mostly in sections 4 & 9 T9S R27E. (See map.)The route (PM 1023) in section 9 from Crooked Creek Rd up to the Dandy Mine and Red Pryor Mountain Rd is designated open for motor vehicles in Alt D. This route should be designated for non-motorized use only. The rest of the loop including the switchback route, mostly in section 4, from Crooked Creek Rd up to the Lisbon Mine is closed in Alt D. This entire loop should be designated for non-motorized use only. Some Reasons:1. There are an abundance of motorized routes for access to the Pryors, but a scarcity of non-motorized routes.2. There are four other motorized routes up Red Pryor Mountain. Besides Red Pryor Mountain Rd itself, there is the switchback road from Crooked Creek Rd on Custer NF about 1 1/2 mile to the north of this loop, and two routes up from Horse Haven Rd to the west. These contribute to the many loop routes available for motorists.3. The trailhead for this hiking loop is accessible without a 4 WD vehicle. Yet the hike provides outstanding views of Demijohn Flat, Crooked Creek Canyon and the East Pryor Mountain block. Overview of motorized and non-motorized designations The following table compares designations of motorized and non-motorized routes in Alternatives A (current and no-action), Alt D (BLM Preferred) and the Pryors Coalition proposal. Data is from TMA maps 143 and 146 in the RMP. Numbers in the Pryors Coalition proposal are based on all the non-motorized routes suggested above in</p>		

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		this letter. Obviously our suggestions are very modest and come nowhere close to a balance between motorized and nonmotorized routes. A few more non-motorized routes might be designated later in implementation-stage planning from administrative only and closed routes. But since most recreationally desirable routes are already designated and included in the table above, that will not greatly improve the imbalance. This is particularly true since the Custer NF Travel Plan for the Pryors includes 124 miles of designated motorized routes and only a single .6 mile designated non-motorized route.		
DR-MTDK-BL-13-0436-16	Recreation	While some PC supporters do participate in these activities the list is a very incomplete representation of the "visitor services" the public seeks in the Pryors. Two of the five categories are hunting. (Some Pryors visitors hunt, most do not.) "Vehicle Exploring" is apparently about four-wheeling or ATV cruising. "Viewing wild horses" is a narrow category. The only remaining category, "wildlife viewing" does not begin to cover the public interest in the Pryors. What about routes "associated with" foot or equestrian "exploring"? Or motorized routes for access to hiking routes? People are looking for scenery, wildflowers, birds, photography, solitude, relaxation, scientific study etc.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS. Thank you for your comments. The RMP has been altered to reflect your concerns.
DR-MTDK-BL-13-0436-17	Travel mngt	The reason for the seasonal closure should be expanded to include the fact that it is winter and the higher elevations are snowed in. Signs and seasonally closable barricades like those Custer NF has installed on Big Pryor Mountain should be installed.	n	Installation of signs and barricades is an implementation level decision, not an RMP level decision and will be addressed in a site specific plan. In accordance with the recent "Winter Wildlands Alliance V. US Forest Service" and in compliance with EO 11644, the BLM will address snowmobile use as being an OHV activity. The text in the RMP has been altered to reflect these comments.
DR-MTDK-BL-13-0436-18	Travel mngt	Only those routes, forks, and branches for which a clear and distinct administrative need can be demonstrated should be kept. The rest should be decommissioned, and removed from the system.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS.
DR-MTDK-BL-13-0436-19	Travel mngt	The draft RMP does not say much about snowmobiles. Several places it is stated that snowmobiles would be "limited to designated routes" in certain areas (e.g. ACECs, PMWHR) (2-147, 2-173) and "WSAs would continue to be closed to ... snowmobile use" even if Congress releases the areas from wilderness consideration (2-169).	n	Following the recent court decision (Winter Wildlands Alliance V. US Forest Service) and in compliance with EO 11644, the BLM will address snowmobile use as being an OHV activity. The RMP decisions have been altered to reflect this. Please see Glossary for definition of "OHV", Appendix O, and chapters 2, 3, and 4, Travel and Trail sections.
DR-MTDK-BL-13-0436-2	ACEC	Congress could at any time release the WSAs on East Pryor. Then the WSA surrogate for ACEC protection would vanish. We do not think the language that this area "would be managed as an ACEC" (2-169) is adequate. It should BE an ACEC. If Congress does release these WSAs will a whole new process be needed to recreate this ACEC if it is canceled in the current RMP?	N	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the B&PPNM RMP/EIS ACECs are proposed where special management attention is required to protect the important and relevant values in relationship to management in the BLM preferred alternative in the RMP. Should existing management be

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
				<p>present (like a WSA) that protects the relevant and important values then ACEC designation is not necessary. Language is included in the RMP that should congress (ever) make a decision on wilderness in the Pryors, and this area not be designated wilderness, then it would be managed as an ACEC.</p> <p>As WSAs contain the most restrictive management, there is no need for an ACEC to overlap the WSA. The relevant and important values of the East Pryor ACEC are addressed through the management of the WSAs. Thank you for your comments.</p> <p>In regards to the overlapping designations of ACEC/Wild Horse Range/WSAs, the actual management prescriptions (No Oil and Gas development, etc.) are intended to be in place regardless of the land's designation.</p> <p>The text in Chapter 2-169 reflects the BLM intent to continue protective management actions if Congress releases them from WSA status.</p>
DR-MTDK-BL-13-0436-20	Travel mngt	The RMP says "Motorized travel in TMAs would be limited to designated roads and trails." It is not clear whether this statement is intended to include snowmobiles. We think the statement should explicitly include snowmobiles as is done in other places in the RMP.	n	Following the recent court decision (Winter Wildlands Alliance V. US Forest Service) and in compliance with EO 11644, the BLM will address snowmobile use as being an OHV activity. The RMP decisions have been altered to reflect this. Please see Glossary for definition of "OHV", Appendix O, and chapters 2,3, and 4, Travel and Trail sections.
DR-MTDK-BL-13-0436-21	Travel mngt	We note the recent (March 2013) Idaho District Court decision that the snowmobile exemption in the Forest Service 2005 Travel Management Rule did not comply with Executive Order 11644.	y	Thank you for your comment. Following the recent court decision (Winter Wildlands Alliance V. US Forest Service) and in compliance with EO 11644, the BLM will address snowmobile use as being an OHV activity. The RMP decisions have been altered to reflect this. Please see Glossary for definition of "OHV", Appendix O, and chapters 2, 3, and 4, Travel and Trail sections.
DR-MTDK-BL-13-0436-22	NEPA	The Pryors Coalition is concerned that neither BLM nor CNF appears to have any overall Vision or Master Plan for the future of the Pryors.	n	Thank you for your comment
DR-MTDK-BL-13-0436-3	ACEC	In Alt A East Pryor ACEC is included in the list of areas "closed to mineral material disposals" but is not listed in Alt 0 (2-106). Similarly "mineral materials sales and permits" are "not allowed" in East Pryor ACEC in Alt A, but are allowed in Alt D (2-147). Surely it is not wise to relax the current protection of this very special area. (Is this a mistake in the RMP document?)	N	<p>Thank you for your comments.</p> <p>Mineral materials sales and permits are a discretionary action.</p>
DR-MTDK-BL-13-0436-4	Oil and Gas	we are very concerned about the possibility of mining of fracking sand in the Bear Canyon area.	n	Thank you for your comment. The BLM is aware of the potential for and interest in "frack" sand in the Bear Canyon area. Any proposed activity will be subject to the BLM's 43 CFR 3809 Surface Management Regulations. Actual mining or disturbance greater than 5 acres would require the submittal of a Plan of Operations and compliance with NEPA.
DR-MTDK-BL-	Travel mngt	Alternative D designates 130 miles of motorized routes and NO non-motorized routes. We have not found any discussion in the RMP where the thrust of the	y	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
13-0436-5		analysis is something balanced and symmetrical-like: "Would particular routes be most valuable as a motorized or as non-motorized routes?" Instead the tone is "Is there any reason routes should not be motorized?" The presumption seems to be that routes should be motorized unless a reason is found for them not to be. And there is no indication that "to provide a non-motorized route" was ever considered as such a reason. In the Recreation and Visitor Services section of Appendix O (0-156 to 169) non-motorized activities like hiking, biking and equestrian are mentioned (barely) in the first paragraph - but never again. It is true as claimed (0-156) that people interested in non-motorized activities also use roads, but only as access for other "Visitor Services." The motorized routes are not the objective. Different types of motorized routes ("comfortable, low risk" or "challenging, high risk driving experiences") are discussed in some detail, but non-motorized routes are not mentioned, let alone different types of non-motorized routes. Non-motorized users should be provided a variety of options, including different trail lengths and levels (easy, moderate, strenuous). ² In general whenever we use the term "non-motorized" we are referring to hiking, equestrian, and mountain bike use. There may be some situations where certain of these activities are not appropriate such as mountain bikes in WSAs.		under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS. The initial work as seen in the draft RMP did not include recent revisions to Travel and Transportation planning. BLM Manual 1626 (Travel and Transportation) specifies that BLM establish a comprehensive program for both motorized and non-motorized travel. This will be done in this RMP. Please refer to Appendix O and Table 2.62
DR-MTDK-BL-13-0436-6	Travel mngt	Equestrians, including the Beartooth Back Country Horsemen, have legitimate safety concerns with mixing horses and bicycles. As the number of recreation visits to the Pryors continues to increase there may be a need for nonmotorized routes closed to mountain bikes.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS. This particular comment is not within the scope of the RMP, but it is an implementation decision and can be addressed elsewhere.
DR-MTDK-BL-13-0436-7	Travel mngt	The management plan needs to identify and designate both motorized and non-motorized routes at the same time in a balanced plan to provide an appropriate range of recreational opportunities and to minimize use conflicts. Postponing non-motorized designations until later will not work if all the prime routes are already designated in the RMP for motorized use. The designation of certain tracks for motorized use precludes their designation as non-motorized routes later.	y	BLM Manual 1626 (Travel and Transportation) specifies that BLM establish a comprehensive program for both motorized and non-motorized travel. This will be done in this RMP. Please refer to Appendix O and Table 2.62
DR-MTDK-BL-13-0436-8	Travel mngt	Most routes are not identified with names or numbers in the RMP on the TMA maps or in the text. The key map for the route inventory sheets on the BLM website at: http://www.blm.gov/mt/stJen/fo/billings field office/rmp/drmp/travel management/pryors.html is incomplete. 54 of the 144 inventoried route segments do not have route number labels on the map. Due to the high density of routes mapped it is often unclear just which route on the map a route number label applies to. Therefore we may not always have the correct route ID number. The descriptions should resolve any resulting ambiguity.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS. Specifically, though, the maps have been revised and now show route numbers.
DR-	Travel	The north end of 2 mile of Bear Canyon "road" (In north 1/2 of section 3, PM1	n	Thank you for your comment.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
MTDK-BL-13-0436-9	mngt, recreation	070) This section in the bottom of the canyon was washed out by a flood in spring 2011. It is currently signed closed to motorized use and barricaded. This is the only designated non-motorized route in any alternative (Alt B, map 144). In Alt 0 this section is designated open to motorized use (map 146). Several reasons why this route should be designated for non-motorized use only.1. This route is in a sensitive and rare (in the Pryors) riparian area. Bear Canyon is one of the few canyons on the south side of the Pryors that has intermittent to perennial water available for wildlife. It is also part of a National Audubon Society-designated Important Bird Area. Motorized use would significantly disturb birds and other wildlife using and dependent on the area.2. This area is infested with invasive weeds. Efforts to manage those weeds are beginning. Motorized use will seriously handicap this effort. Also motor vehicles making a quick 1 mile round trip tour into this canyon before going on up the Bear Canyon Ridge Rd (PM 1069) would collect weed seeds to distribute throughout the rest of Big Pryor Mountain.3. This route is part of an increasingly popular hiking route for people who wish to escape motorized commotion. It has been used several times already in 2013 by MWA hiking groups. The presence of new cairns marking the descent into Bear Canyon indicate additional use by other hikers.4. This is a dead end route for motorized use. The old (and illegal) track on north into Custer NF is closed to motorized use.		With regard to comment #2, weed infestation: It is a documented fact the motorized travel is a vector for the transport of invasive and noxious weeds. However, there are many vectors for the transport and deposition of invasive and noxious weed seeds, including hiking boots, clothing, pets etc.. Therefore, limiting the trail designation to non-motorized would not necessarily eliminate the spread of invasive and noxious weeds. Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS In regards to the Bear Canyon route, the RMP has a range of possible decisions. In this case, due to the conditions you mentioned the Alternative D has been modified to reflect the current conditions. The route will be designated as "closed" Refer to map 146
DR-MTDK-BL-13-0438-1	NEPA	four RMP volumes are 5.5 inches thick and do not include the 2,549 on-line pages of Background & Supporting Material for Travel Plan, nor all necessary travel mapping. 40CFR part 1500.4 states "Agencies shall reduce excessive paperwork by: Reducing the length of environmental impact statements (1502.2), by means such as appropriate page limits (1501.7(b)(l) and 1502.7).	N	Thank you for your comment. (non substantive)
DR-MTDK-BL-13-0438-10	Travel mngt	Routes CW2024 and CW2025 should be open to motorized users. This would allow access to state land from the west and south for hunting purposes.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS. In regards to your specific comment regarding access to the Montana State Land Parcel, the RMP has a range of possible decisions. In this case, the decision to ensure adequate public access resulted in CW 1030, the proposed access route, being closed and CW 2024 being designated as "open" while CW 2025 remains unchanged.
DR-MTDK-BL-13-0438-2	Travel mngt	All of the background and supporting information for individual routes that I looked at were all dated in 2009. Why wasn't this information available between the summer of 2009 and sometime in the latter part of May 2013? The RMP process started off well in August and September of 2008 and continued until August 2009 with little information from the BLM or dialogue since then until the issuance of the RMP DEIS.	n	The BLM hosted a number of public meetings throughout the region in the course of preparing this RMP including a series recently once the draft was completed, as well as meeting with a number of individuals and organizations whenever requested.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
DR-MTDK-BL-13-0438-3	NEPA	40CFR1502.22 talks about foreseeable significant adverse effects on the human environment in an EIS and there are incomplete or unavailable information, the agency shall make clear such information is lacking. Habitat fragmentation, sage grouse habitat and cultural resources were factors in the BLM Background & Supporting Material for Travel Plan which was not available until after half of the comment period had expired. Preferred Alternative D calls for 302 miles of Administrative Use Only routes and 59.9 miles of closures which are evaluated in the material which was not immediately available or disclosed when the DEIS was issued. The documentation and references to habitat and cultural issues lead one to believe travel management decisions fall in the adverse effects on the human environment discussion.	N	Thank you for your comment. Please see the route reports. All resources and resource uses were considered for each route report evaluation.
DR-MTDK-BL-13-0438-4	NEPA	I suspect we will have many twists to the sage-grouse issue well into the future. How will this affect Montana and its economy in the future; that is the main question.	N	Thank you for your comment.
DR-MTDK-BL-13-0438-5	Travel mngt	Page 3-197 has a table entitled Estimated Number of Vehicles Used Off-Highway in Montana (1990-1998), which was used to project regional recreational use to 2015. The data is not only out of date but also makes some flawed conclusions. For instance, how many of the motorcycles used in the table weren't built for off-highway usage?	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS..
DR-MTDK-BL-13-0438-6	Travel mngt	Route PM1023 is listed as an Open to 50" or Less route. This is a route used by all sized vehicles as not only a loop, but a cut across from Helt Road to Crooked Creek Road. If this is not changed, some visitors would have to go approximately twelve miles out of the way.-There is a switchback north of PM1023 which has been used for many years by many recreationists to go from Red Pryors Road to Crooked Creek Road. Reading your latest route numbered maps, it looks like it goes from PM1017 to PM1025. Alternative D shows the route as being closed. This is an important loop and access route which should be kept open.	n	Thank you for your comments. These comments are addressed in the Travel Comments. The vehicle route PM 1023 and PM 1024 decision has been reviewed by BLM staff and the decision is to allow all size vehicle to use PM 1023 The decision for closure of PM 1024 is that it is a redundant route (PM 1023 provide the same experience and opportunity) and it will continue to be closed.
DR-MTDK-BL-13-0438-7	Travel mngt	There are routes which are not shown on the RMP maps, particularly in the Hollenbeck area.	n	Thank you for your comments. The BLM has stated that additional routes can be added and is aware that in this particular area there are additional existing routes. The text in the RMP has been specifically altered to reflect this
DR-MTDK-BL-13-0438-8	Travel mngt	Looking at the most recent maps which have route numbers, I see routes which do not have route numbers or names. Many of these routes are on the Cottonwood Weatherman map near the Wyoming border. What is the status of this area?	n	In this case, the density of the routes was such that displaying individual routes with their numbers was not feasible. The motorcycle routes in the Elk Basin area were numbered as being EB 001, EB 002, or EB 003 inclusively. In regards to the status of these routes, the RMP has a range of possible decisions. In Alternative D, the chosen one, these 103 miles of routes would remain open to all types of vehicles.
DR-MTDK-BL-13-0438-9	Travel mngt	Routes PM1071 and PM1072 should be considered for opening to OHV travel. This is a connector loop which ties into Bear Canyon Road PM1067. Neither route indicates habitat or cultural issues.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
				<p>associated with the Billings and Pompeys Pillar National Monument RMP/EIS</p> <p>In regards to the two routes mentioned, the RMP has a range of possible decisions. In this case, due to the conditions documented in the Route Inventory the Alternative D has been chosen to best meet regulatory obligations. The routes will be designated as “closed” Refer to map 146</p>
DR-MTDK-BL-13-0440-1	Wildlife	The plan should clearly document its analysis of the NTT report recommendations	n	<p>The NTT report (or BER, or COT) is not the sole source of management decisions for the range of alternatives. A National Technical Team (NTT) was formed as an independent, science-based team to ensure that the best information about how to manage the greater sage-grouse is reviewed, evaluated, and provided to the BLM and the Forest Service in the planning process. The group produced a report in December 2011 that identified science-based management considerations to promote sustainable greater sage-grouse populations. The NTT is staying involved as the BLM and the Forest Service work through the Strategy to make sure that relevant science is considered, reasonably interpreted, and accurately presented; and that uncertainties and risks are acknowledged and documented.</p> <p>A baseline environmental report, titled Summary of Science, Activities, Programs, and Policies That Influence the Rangeland Conservation of Greater Sage-grouse (<i>Centrocercus urophasianus</i>) (referred to as the BER), was released on June 3, 2013, by the U.S. Geological Survey. The peer-reviewed report summarizes the current scientific understanding about the various impacts to greater sage-grouse populations and habitats and addresses the location, magnitude, and extent of each threat. The BER does not provide management options. The report is being used by the BLM and the Forest Service in our efforts to develop regulatory mechanisms and improve our conservation efforts of the greater sage-grouse and its habitat to reduce the potential for listing it under the Endangered Species Act. The data for this report were gathered from BLM, Forest Service, and other sources and were the “best available” at the range-wide scale at the time collected. The report provides a framework for considering potential implications and management options, and demonstrates a regional context and perspective needed for local planning and decision-making.</p> <p>In March 2012, the FWS initiated a collaborative approach to develop range-wide conservation objectives for the greater sage-grouse to inform the 2015 decision about the need to list the species and to inform the collective conservation efforts of the many partners working to conserve the species. In March 2013, this team of State and FWS representatives, released the Conservation Objectives Team (COT) report based upon the best scientific and commercial data available at the time that identifies key areas for greater sage-</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
				<p>grouse conservation, key threats in those areas, and the extent to which they need to be reduced for the species to be conserved. The report serves as guidance to Federal land management agencies, State greater sage-grouse teams, and others in focusing efforts to achieve effective conservation for this species.</p> <p>The range of alternatives is based upon analysis of public scoping comments as well as information provided in the NTT report, the BER, the COT report, and State management plans. The alternatives represent different degrees of and approaches to balancing resources and resource use among competing human interests, land uses, and the conservation of natural and cultural resource values, while sustaining and enhancing ecological integrity across the landscape, including plant, wildlife, and fish habitat.</p> <p>Greater sage-grouse conservation measures in A Report on National Greater Sage-grouse Conservation Measures (NTT 2011) were used to form BLM and the Forest Service management direction under at least one alternative (Alternative B and portions of D), which is consistent with the direction provided in BLM Washington Office Instruction Memorandum 2012-044 (the BLM must consider all applicable conservation measures developed by the NTT in at least one alternative in the land use planning process).</p> <p>Additionally, all alternatives considered within this planning process are consistent with conservation measures and objectives outlined in the COT Report and follow the basic principles of: (1) avoiding the impact of an activity; (2) minimizing impacts by limiting the degree of activity; and (3) mitigating for an impact by improving or enhancing greater sage-grouse habitat. Each of the alternatives considers different means for accomplishing this strategy. For example, some alternatives place greater emphasis on avoidance of impacts, whereas other alternatives place more emphasis on minimization and mitigation.</p> <p>While there was consistent direction provided in alternative develop, such as BLM WO IM 2012-044, variation across sub-regionals was needed to accommodate the local issues and specific state and Forest Service requirements.</p>
DR-MTDK-BL-13-0440-10	Wildlife	The BLM has the greatest opportunity to affect the status of the white-tailed prairie dog, a BLM special status species (note: Table 3-26 at p. 3-77 should note that the white-tailed prairie dog is an S1 state species of concern listing, the highest level of threat under MFWP assessment16). Defenders is pleased to see this is a priority for BLM (Draft Billings RMP, Alternatives, Table 2.61, p. 274). As noted in the Draft RMP, the most current estimate of white-tailed prairie dogs in 2005 on BLM lands was precipitously low (Billings Draft RMP, Affected Environment, Table 3-28, p. 380-81), in the order of 100-200 acres. Segland et al. (2005) stated that "The current observed decline of the WTPD in Montana	n	<p>Thank you for the comment. Refer to Chap. 2, pages 2-74 and 75. Note that prairie dog management is subject to the, "Conservation Plan for Black-tailed and White-tailed prairie dogs in Montana, 2002", along with several alternatives described. Best Management Practices or conservation strategies are discussed in that plan.</p> <p>In reference to shooting the 2002 plan states, "Management regulations for prairie dogs will be jointly established by Fish, Wildlife & Parks, and the Fish, Wildlife & Parks Commission and subject to public review in the same manner as annual rules are established for other species. Regulations pertaining to</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		<p>during this century represents a range contraction for the species, and risk of extirpation in the short-term is high." The BLM has previously proposed, in cooperation with Montana Fish, Wildlife and Parks ("FWP") a translocation program to increase white-tailed prairie dogs on BLM lands (consistent with Wildlife alternative D in Draft Billings RMP, Alternatives, Table 2-6.1, p. 2-75 (and see Segland et al. 2005). However, this proposal did not materialize. Although the BLM may not control the majority of surface area occupied by white-tailed prairie dogs (Segland et al 2005)¹⁷, BLM lands may be the last best hope for the white-tailed prairie dog in Montana given the BLM's resources and statutory obligation to protect them and their habitat. Therefore Defenders urges the BLM to implement the translocation activity. Second, and critically, the BLM must enact shooting closures on white-tailed prairie dog colonies immediately, and this should be specified in the RMP. As Segland et al noted, "MFWP and the Montana Fish, Wildlife, and Parks Commission adopted a year-round shooting closure on WTPDs throughout their range in Montana (not including school state trust lands, private, or tribal lands) beginning March 2002. An extension of this closure was approved in 2003 and 2004." However, the Montana legislature refused to extend the management designation for prairie dogs in 2007, and has failed to give Montana Fish, Wildlife, and Parks management authority to take action to conserve or manage prairie dogs, including regulating the take of prairie dogs. Given this void, the BLM truly needs to take the initiative to meet its statutory mandate in the planning area. Defenders commends the BLM for recognizing its responsibility and cooperating in past conservation efforts, but this gap in conservation protection from shooting needs to be remedied in order for the BLM to meet its statutory obligations. Shooting pressure can result in extinction of small colonies and is likely to impair any ability of existing colonies to grow (see review by Segland et al 2005). Without an annual shooting closure, unregulated take of white-tailed prairie dogs could lead to their demise in Montana, which would in turn be a significant change in their range-wide status.</p>		<p>prairie dog shooting will be evaluated on an annual basis."</p> <p>Note that white-tailed prairie dogs were translocated in 2006 from dog towns disturbed from Highway #72 construction near Belfry to a Historic dog town location through a cooperative project with Montana Fish, Wildlife, and Parks.</p> <p>Prairie dogs are considered BLM Special Status Species (I.M. MT-2009-039) and will be considered in all activities proposed on public lands.</p>
DR-MTDK-BL-13-0440-11	Wildlife	<p>Further, Defenders urges the BLM to adopt as part of this plan, a statement of "best management practices"¹⁸ for black-tailed and white-tailed prairie dogs that includes at a minimum the following:1) Shooting closures/management Shooting has significant effects on prairie dog populations (Pauli 2005; Keffer et al. 2000; Segland et al 2005). BLM needs to close at least some core habitat within each conservation area it identifies to shooting. Shooting closures initiated by federal managers to maintain black-footed ferret habitat currently exist on federal lands in South Dakota, Wyoming, Colorado and in the past, in Montana as well. The BLM has the legal authority to regulate prairie dog shooting on BLM lands (see, e.g., 64 Fed. Reg. 56213 (Oct.18, 1999). Colonies free of shooting will provide refugia where prairie dog production, instead of being taken by shooters, can</p>	n	<p>Thank you for the comment. Refer to Chap. 2, pages 2-74 and 75. Note that prairie dog management is subject to the, "Conservation Plan for Black-tailed and White-tailed prairie dogs in Montana, 2002", along with several alternatives described. Best Management Practices are discussed in that plan.</p> <p>In reference to shooting the 2002 plan states, "Management regulations for prairie dogs will be jointly established by Fish, Wildlife & Parks, and the Fish, Wildlife & Parks Commission and subject to public review in the same manner as annual rules are established for other species. Regulations pertaining to prairie dog shooting will be evaluated on an annual basis."</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		<p>provide a source of prairie dogs to "restock" colonies that are decimated by shooting elsewhere and by plague. New access roads should avoid intersecting a prairie dog colony or bisecting two adjacent colonies, to avoid access by recreational shooters (see, e.g. BLM 2007, recommendation 9). Work with Montana Fish, Wildlife and Parks to reestablish restrictions on prairie dog shooting, including both seasonal closures for non-priority areas and annual closures for priority and white-tailed prairie (see, e.g. BLM 2007, recommendation 14).2) Poisoning Ensure there is no unauthorized control of prairie dogs on BLM lands. Prairie dog control on public land should not be authorized except for human health and safety reasons (see e.g. BLM 2007, recommendation 7). Notify the public that unauthorized use of poisons for prairie dog control is not allowed on BLM lands (see e.g. BLM 2007, recommendation 8). 3) Prairie dog expansion/supplementation Utilize translocations of prairie dogs and other habitat enhancing techniques to maximize the footprint of prairie dog occupancy in white-tailed prairie dogs and to meet statewide Category 1 and 2 contributions for black-tailed prairie dogs. Establish land stewardship agreements with other agencies and/or private landowners where large (1,000 acre) prairie dog towns or complexes exist adjacent to BLM land ownership. These agreements can control potential uses that may be detrimental to prairie dogs and their habitats, while preserving the landowner's intent for use (see e.g. BLM 2007 recommendation 17).The BLM should avoid the sale or exchange of lands with prairie dogs and should attempt to acquire parcels with prairie dogs on them (see e.g. BLM 2007 recommendation 16). BLM should review the list of disposal property in Appendix H of the Draft RMP to confirm that it is not disposing of property that has had active prairie dogs in the past 10 years or that may contribute to a Category 1, 2, or 3 prairie dog conservation goals. Defenders believes that prairie dog management will be more effective if an aggressive program of land consolidation is undertaken throughout the planning area generally. Retention of lands inside conservation priority areas should be specifically incorporated into retention and acquisition priority criteria. Consolidating BLM management in priority areas will reduce potential prairie dog edge conflicts with neighbors and allow for more efficient administration.4) Plague management Current plague mitigation for prairie dogs involves application of deltamethrin dust (Biggins et al 2010), which has been shown to be effective in suppressing flea populations, thus interdicting plague outbreaks in prairie dogs. Currently some half dozen black-footed ferret reintroduction areas in the U.S. and Canada deploy deltamethrin as part of the management regime for black-footed ferret and prairie dog conservation. BLM needs to consider use of deltamethrin or other plague management tools to maintain prairie dog numbers, particularly in white-tailed prairie dogs and in some subset of colonies within priority zones to maintain prairie dog colonies for prairie dog associates</p>		<p>Note that white-tailed prairie dogs were translocated in 2006 from dog towns disturbed from Highway #72 construction near Belfry to a Historic dog town location through a cooperative project with Montana Fish, Wildlife, and Parks.</p> <p>Prairie dog poisoning has not been authorized on public lands in the Billings Field Office.</p> <p>Prairie dogs are considered BLM Special Status Species (I.M. MT-2009-039) and will be considered in all activities proposed on public lands.</p> <p>Currently, several dynamic factors are influencing prairie dog management. These include plague and vaccine research, landowner incentive programs, prairie dog town mapping, complex Category designations (1, 2, 3), and black-footed ferret reintroduction. BLM is actively participating in the Prairie Dog Working Group and will support plans and research results developed by the group.</p> <p>According to the Glossary definition, page 5, "Black-footed ferret habitat: a complex of prairie dog towns within 1.5 kilometers of each other comprising a total of 1,000 acres.", there is not Category 1, black-footed ferret habitat, on public lands within the field office. The potential may exist if other land ownerships are considered in complex designations.</p> <p>All Special status species, including prairie dogs, are considered during the Grazing Permit Renewal process.</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		<p>and potential future blackfooted ferret reintroduction.5) Surface disturbance Further oil and gas exploration and development should be excluded on occupied prairie dog colonies. Defenders supports the NSO designation within ¼ mile for all prairie dog colonies in the Preferred Alternative D. Defenders disagrees, however, with stipulations described for mountain plovers (Draft Billings RMP, Appendices H, p. H-25-26), and recommends that NSO be extended, without waivers, to all mountain plover habitat (prairie dog colonies), regardless of plover occupancy or season of use. More importantly, it is not known to what extent prairie dog colony dependent grassland birds such as mountain plovers, burrowing owls and ferruginous hawks may exhibit avoidance behavior to oil and gas field development activity, so any surface occupancy needs to be adaptively managed to avoid loss of nesting habitat for plovers. When drilling multiple oil or gas wells, if geologically and technically feasible, drill from the same pad using directional (horizontal) drilling technologies (up to 16 wells per pad, as technologically feasible) to lessen surface impacts on prairie dog colonies/towns (see, e.g. BLM 2007, recommendation 21).When possible, no seismic activity should be allowed in occupied or recovering prairie dog habitat (see e.g., BLM 2007, recommendation 11).BLM should amend rights-of-way classification to include "exclusion" for all prairie dog colonies (for mountain plover and other associated species), with the exception of allowing small scale, non-surface (buried) transmission within 500 feet of an existing road (see Draft Billings RMP, Alternatives, Table 2- 6.2, p. 2-111 et seq.).While prairie dog habitat can be maintained with some loss to surface disturbance (see e.g. Clark et al 1986), surface mining of coal, gravel, bentonite and other minerals is essentially a complete surface conversion and therefore incompatible with maintaining prairie dog habitat, including intra-colony areas needed for connectivity within prairie dog complexes. Therefore, these activities should also be "excluded" for all prairie dog colonies.6) Organizational/coordination steering committee should be formed to develop and prioritize management practices and assist BLM and other stakeholders in prairie dog conservation efforts (see e.g., BLM 2007, Recommendation 12). The Billings Field Office should continue to participate in the Montana Prairie Dog Working Group and actively participate in its implementation (BLM 2007, recommendation 13). The Billings Field Office should participate in efforts to remove unprotected status of prairie dogs in conjunction with the Montana Prairie Dog Working Group (see e.g., BLM 2007, recommendation 14). BLM should encourage, support, and/or establish a prairie dog research program, addressing issues such as: The effect(s) of oil and gas development on prairie dogs, sylvatic plague control and population viability analysis.7) Grazing Miles City STANDARD #5 of the Standards for Rangeland Health and Guidelines for Livestock Grazing Management for Public Lands Administered by the Bureau of Land Management for Montana and the Dakotas:</p>		

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		provides that "habitats are improved or maintained for special status species (federally threatened, endangered, candidate or Montana species of special concern)." (Draft Billings RMP, Appendix I). This means that native plant communities will be "maintained or improved to ensure the proper functioning of ecological processes and continued productivity and diversity of native plant life forms. Where native communities exist, the conversion to exotic communities after disturbance will be minimized. "On any given grazing allotment containing prairie dogs, the Bureau and grazing permittee should manage for a mosaic of range conditions (see e.g., BLM 2007 recommendation 9). Areas occupied by prairie dogs may have reduced vegetation while other areas of the allotment which do not contain prairie dogs may have thicker stands of grass and forbs.		
DR-MTDK-BL-13-0440-12	Wildlife	Ensure that prairie dog conservation is being addressed on all livestock permit renewal evaluations and associated environmental assessments for oil and gas developments, rights-of-way grants, organized recreational events, etc. (see e.g., BLM 2007, recommendation 17).	n	Thank you for the comment. The BLM addresses these concerns in NEPA documentation during routine operations. This is not an RMP issue. Prairie dogs are considered BLM Special Status Species (I.M. MT-2009-039) and will be considered in all activities proposed on public lands.
DR-MTDK-BL-13-0440-13	Livestock Grazing	Grazing should be reduced or eliminated during drought. Practices should avoid vegetation stand conversions (BLM 2007, Recommendation 18).	n	In Table 2-6.2 on page 2-116 of the DRMP under management common to all alternatives it is stated "During periods of drought, adjust livestock numbers commensurate with the needs of other resources in the area (riparian, wildlife, etc.)" In Table 2.6.1, pages 2-59 and 2-60 of the DRMP, there are several management actions prescribed under the alternatives to improve the resiliency of the native vegetative communities which would reduce the likelihood of vegetative stand conversions. There are varied action alternatives (page 2-60) to convert non-native crested wheatgrass seedings to native vegetative communities.
DR-MTDK-BL-13-0440-2	Wildlife	The MMCAs were purportedly used in the RMP and EIS process as a tool to help develop management alternatives (AB-1). However, it is unclear how they influenced alternative development in the plan. Given the mixed derivation of Appendix M, it is also unclear if the DRMP/EIS analyzed the entirety of the NTT recommendations as directed by the Washington Office (BLM Memo 2012-044), or only some of the NTT prescriptions mixed in with recommendations from other sources.	n	Thank you for your comment. In response to the greater sage-grouse management objectives described in the 2006 WAFWA Greater Sage-grouse Comprehensive Conservation Strategy, many reports have been prepared for the development of management recommendations, strategies, and regulatory guidelines. The National Technical Team report (NTT 2011), Conservations Objectives Team (COT; FWS 2013), and the Summary of Science, Activities, Programs and Policies that Influence the Rangewide Conservation of Greater Sage-Grouse (also referred to as the Baseline Environmental Report [BER]; Manier et al. 2013) are the most widely used reports that have been incorporated in BLM and Forest Service EISs that address the effects of implementing greater sage-grouse conservation measures on lands they manage. Management actions by the BLM and the Forest Service in concert with other State and Federal agencies, and private land owners play a critical role in the future trends of greater sage-grouse populations. To ensure management

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
				<p>actions are effective and based on the best available science, the BLM's National Policy Team created a NTT in August 2011. The objective for chartering this planning strategy effort was to develop new or revised regulatory mechanisms, through land use plans, to conserve and restore greater sage-grouse and their habitat on BLM-administered lands on a range-wide basis over the long term. The NTT report (NTT 2011) used the best current scientific knowledge to guide the BLM and the Forest Service planning efforts through management considerations to ameliorate threats, focused primarily on priority greater sage-grouse habitats on public lands.</p> <p>On December 27, 2011, the BLM released IM 2012-044. In accordance with this IM, the BLM must consider all conservation measures developed by the NTT in at least one alternative in the land use planning process. For the majority of greater sage-grouse DRMP/EISs, Alternative B fulfills this requirement by incorporating the recommendations set forth by the NTT. Other alternatives, including those developed by individuals and conservation groups, as well sub-regional alternatives developed by regional offices of the BLM and the Forest Service, have incorporated elements of the NTT report.</p> <p>The COT report (FWS 2013) qualitatively identifies threats/issues that are important for individual populations across the range of greater sage-grouse, regardless of land ownership. The Summary of Science, Activities, Programs and Policies that Influence the Rangeland Conservation of Greater Sage-Grouse (also referred to as the Baseline Environmental Report [BER]; Manier et al. 2013) then provides complimentary quantitative information to support and supplement the conclusions in the COT. Both documents helped planning teams identify issues within their planning area, determine the context within the management zone, prioritize habitats, and assist in creating a range of alternatives with management actions that can alleviate or mitigate threats to greater sage-grouse at an appropriate level. Both the NTT report and the COT report tier from the WAFWA Greater Sage-grouse Comprehensive Conservation Strategy (Stiver et al. 2006).</p> <p>Alternative B and portions of Alternative D are based on A Report on National Greater Sage-grouse Conservation Measures (NTT report) per direction in IM 2012-044. Conservation measures included in the NTT based alternative focus primarily on greater sage-grouse PPH and include a 3-percent disturbance cap in PPH. PPH areas have the highest conservation value to maintaining or increasing greater sage-grouse populations.</p>
DR-MTDK-BL-13-0440-3	NEPA	The DRMP/EIS acknowledges that climate change poses a challenge to resource management (3-26 -" 3- 29) and notes that "sensitive species in the planning area, such as the greater sage-grouse, which are already stressed by declining habitat, increased development, and other factors, could experience additional pressures due to climate change" (3-28; 4-39) (effects of climate	N	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		<p>change could have "very serious impacts" on sage-grouse, 4-39). These additional stressors may include reduced soil moisture, increased drought, diminished water quantity, and increased wildfire (3-25, 3-27, 3-28). However, rather than planning for the anticipated and cumulative effects of climate change on sage-grouse and sagebrush habitats in the DRMP/EIS, the plan instead defers to an adaptive management strategy to be applied, as appropriate, to future management activities in the planning area (2-52, 2-57). Leaving climate adaptation to future project-level decision making could make it difficult to implement needed prescriptions that are not already analyzed and approved in the RMP. For example, livestock grazing is known to reduce ecosystem resilience to climate change (Beschta et al. 2012), and the DRMP/EIS appears to acknowledge that new grazing strategies could improve resilience (4-43), but the plan does not specifically approve taking definitive action to modify grazing systems to achieve this goal. The DRMP/EIS should support future decision making by land managers by identifying and analyzing specific measures that can be implemented across the planning area to address the negative impacts of climate change on sage-grouse and sagebrush steppe.</p>		RMP/EIS. Please see Appendix AA.
DR-MTDK-BL-13-0440-4	Wildlife	<p>The DRMP/EIS declined to separately analyze the Sage-Grouse Recovery Alternative (www.sagebrushsea.org/land_recovery_alternative.htm), a management alternative submitted by conservation organizations to conserve and recover sage-grouse populations. The DRMP/EIS contends that components of the "conservation groups alternative" were substantially considered in the range of other alternatives analyzed in the plan (2-16)- "although it is unclear whether the DRMP/EIS is referring specifically to the Recovery Alternative, since different conservation organizations submitted at least three different conservation alternatives to BLM during the scoping process for the National Greater Sage-Grouse Planning Strategy. The Sage-Grouse Recovery Alternative, though based on the NTT report recommendations, makes additional and stronger management prescriptions for a number of land uses and related effects in sagegrouse range, including livestock grazing, vegetation management, invasive plants, and fire management. These recommendations were not analyzed together or individually in the DRMP/EIS. Moreover, given that sage-grouse populations may continue to decline under the DRMP/EIS (4-285), the BLM should analyze the complete Sage-Grouse Recovery Alternative as a possible strategy to conserve and restore sage-grouse populations and potentially preclude the need to list the species under the ESA.</p>	n	Thank you for your comment. The "Conservation Groups Alternative" on page 2-16 of the DRMP was described as a "Alternative Considered, but not Analyzed in Detail." The explanation for this is included in this section.
DR-MTDK-BL-13-0440-5	Wildlife	<p>The DRMP/EIS asserts that expected impacts from land uses and related effects on sage-grouse and sagebrush habitat in priority protection areas under the preferred alternative (Alternative D) would be similar to impacts under Alternative B, the conservation alternative (2-184 -" 2-185, Table 2-7; 4-281; 4- 567), which prescribes more restrictive management than Alternative D (2-165 -" 2-167,</p>	N	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the B&PPNM RMP/EIS.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		<p>Table 2-6.3) and would also designate priority habitat as an ACEC (4-567).² Such a contention is illogical and without basis. As the plan notes elsewhere, the proposed management of ACECs is the most restrictive for resource uses (2-31) and the Greater Sage-grouse Habitat ACEC would offer the greatest protection for sage-grouse (4-287). Alternative B would close priority habitat to fluid minerals development and exploration, as well as material minerals extraction; exclude renewable energy development in priority areas; close the areas to locatable mineral extraction, and recommend them for withdrawal; specially manage roads to minimize impacts on sage-grouse; restrict the use of prescribed fire in priority habitat and protect sage-grouse leks from heavy equipment used in fire suppression (2-165 - 2-167, Table 2-6.3). Alternative B would also limit discrete anthropogenic disturbances to less than 3% in priority sage-grouse habitat. In comparison, land use prescriptions under the preferred alternative are more flexible and could allow more development in sage-grouse priority habitat (see Table 1). While the plan (in apparent contradiction with the statements cited above) acknowledges that "[m]anagement actions would be less beneficial to wildlife and special status species [under the preferred alternative] than actions provided under Alternative B," a thorough analysis of environmental consequences on sage-grouse and sagebrush steppe is lacking. The plan should more clearly and more thoroughly analyze the anticipated effects of the alternative management regimes on sage-grouse. The Miles City and HiLine draft RMPs could be useful examples for how to analyze environmental consequences of plan alternatives.</p>		<p>Please see crosswalk table in the sage-grouse Appendices AA and AB to see management by alternative for sage-grouse.</p>
DR-MTDK-BL-13-0440-6	Wildlife	<p>The plan should examine whether management alternatives comply with the BLM sensitive species policy. Greater sage-grouse are a candidate species for listing under the Endangered Species Act (ESA) and a designated Bureau of Land Management "sensitive species" across their range. BLM's policy directs that actions authorized, funded or implemented by BLM do not contribute to the need to list a candidate species under the ESA (BLM WO IM 97-118; BLM Manual 6840). Unfortunately, and even with a liberal reading of the DRMP/EIS, it is unclear from the brief, general analysis included in the plan (4-285 - 4-287) whether and which alternatives might comply with the agency's sensitive species policy as applied to sage-grouse. There are also some problems with the current plan that may need to be addressed before BLM can proceed with a sound examination of this question. First, any assessment of the preferred alternative may be compromised by potential implementation of a plethora of waivable and discretionary BMPs and MMCAs incorporated in the alternative (see above). It is unlikely that future project-level decision making would completely, consistently apply these measures throughout the planning area and over the life of the plan. In fact, any analysis of Alternative D should assume that the potential benefits of conservation measures to sage-grouse would likely be less than if all of these</p>	n	<p>Thank you for the comment. BLM can only manage resources and habitat on public lands. Although Alternative D is the "preferred alternative", any range of the alternatives can be selected in the Final Decision Record for the RMP/ EIS to comply with the sensitive species policy.</p> <p>The statement on page 2-184, Table 2.7, will be revised to, "Alternative D will provide less protection to wildlife resources than Alternative B due to smaller buffers and fewer exclusion areas for potential development."</p> <p>The subject of the remaining comments are beyond the scope of the RMP/EIS.</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		<p>measures were compulsory. Second, the relatively shallow analysis and occasionally schizophrenic comparison of Alternatives B and D in the plan ("[t]he impacts to wildlife and [Special Status Species], (sic) would be the same under Alternative D as those described under Alternative B, with less protection to wildlife resources due to smaller buffers and fewer exclusion areas for potential development," 2-184, Table 2.7) must be expanded and clarified in order to provide a basis for determining whether these alternatives comply with the BLM sensitive species policy (see above). Even accounting for the uncertainties and ambiguities in the current analysis, it is likely that management under all alternatives would continue to impact sage-grouse (4-285). Existing and foreseeable energy development on all land ownerships in the planning area (4-285 -" 4-286; 3-164; Map 24); inadequate protections in general habitat areas (e.g., 0.6-mile lek buffers, 2-45, Table 2-5); and agricultural conversion on private lands (4-287 -" 4-288) would all likely negatively affect sage-grouse populations.</p>		
DR-MTDK-BL-13-0440-7	Wildlife	<p>The plan should incorporate important, new information concerning sage-grouse and sagebrush steppe. The following new information related to sage-grouse and sagebrush steppe was published during preparation of the Billings-PPNM DRMP/EIS and should be considered in the plan, as appropriate. 1. Beschta, R. L., D. L. Donahue, D. A. DellaSala, J. J. Rhodes, J. R. Karr, M. H. O'Brien, T. L. Fleischner, C. Deacon-Williams, Cindy. 2012. Adapting to climate change on western public lands: addressing the ecological effects of domestic, wild, and feral ungulates. Environmental Management, available at http://fes.forestry.oregonstate.edu/sites/fes.forestry.oregonstate.edu/files/PDFs/Beschta/Beschta_2012EnvMan.pdf. Domestic livestock and other ungulates alter vegetation, soils, hydrology, and wildlife species composition and abundances that exacerbate the effects of climate change on western landscapes. Removing or reducing livestock grazing across large areas of public land would alleviate a widely recognized and long-term stressor and make ecosystems less susceptible to the effects of climate change. 2. Knick, S. T., S. E. Hanser, K. L. Preston. 2013. Modeling ecological minimum requirements for distribution of greater sage-grouse leks: implications for population connectivity across their western range, U.S.A. Ecology and Evolution, available at http://onlinelibrary.wiley.com/doi/10.1002/ece3.557/pdf. Sage-grouse require sagebrush-dominated landscapes containing minimal levels of anthropogenic disturbance. Ninety-nine percent of remaining active sage-grouse leks were in landscapes with less than 3 percent disturbance within 5 km of the lek, and 79 percent of the area within 5 km was in sagebrush cover. 3. Patricelli, G. L., J. L. Blickley, S. L. Hooper. 2012. The impacts of noise on greater sage-grouse: a discussion of current management strategies in Wyoming with recommendations for further research and interim protections. Unpublished report. Prepared for the</p>	n	<p>Before beginning the B&PPNM RMP/EIS and throughout the planning effort, the BLM and the Forest Service considered the availability of data from all sources, adequacy of existing data, data gaps, and the type of data necessary to support informed management decisions at the land-use plan level. The data needed to support broad-scale analysis of the Billings Field Office planning area are substantially different than the data needed to support site-specific analysis of projects. The RMP/EIS data and information is presented in map and table form and is sufficient to support the broad scale analyses required for land use planning.</p> <p>The BLM and the Forest Service used the most recent and best information available that was relevant to a land-use planning-level analysis including the Baseline Environmental Report (BER; Manier et al. 2013). The BER assisted the BLM and the Forest Service in summarizing the effect of their planning efforts at a range-wide scale, particularly in the affected environment and cumulative impacts sections. The BER looked at each of the threats to greater sage-grouse identified in the Fish and Wildlife Service's "warranted but precluded" finding for the species. For these threats, the report summarized the current scientific understanding, as of report publication date (June 2013), of various impacts to greater sage-grouse populations and habitats. The report also quantitatively measured the location, magnitude, and extent of each threat. These data were used in the planning process to describe threats at other levels, such as the sub-regional boundary and WAFWA Management Zone scale, to facilitate comparison between sub-regions. The BER provided data and information to show how management under different alternatives may meet specific plans, goals, and objectives.</p> <p>Additionally, the BLM and the Forest Service consulted with, collected, and</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		<p>Bureau of Land Management, Lander Field Office and Wyoming State Office, Cheyenne and Wyoming Game and Fish Department; available at http://www.wy.blm.gov/jio-papo/papo/wildlife/reports/sagegrouse/2012sgNoiseMon.pdf.⁴ Maximum noise levels from land use and development allowed under the Wyoming state sage-grouse core area policy near sage-grouse leks and other habitat are untested, may be difficult to measure, and may be too high to support sage-grouse conservation within and outside core areas.⁴ Reisner, M. D., J. B. Grace, D. A. Pyke, P. S. Doescher. 2013. Conditions favoring Bromus tectorum dominance of endangered sagebrush steppe ecosystems. Journal of Applied Ecology, available at http://onlinelibrary.wiley.com/doi/10.1111/1365-2664.12097/pdf.⁵ Cattle grazing exacerbates cheatgrass (Bromus tectorum) dominance in sagebrush steppe by decreasing bunchgrass abundance, shifting and limiting bunchgrass composition, increasing gaps between perennial plants, and trampling biological soil crusts. Grazing was also not found to reduce cheatgrass cover, even at the highest grazing intensities.⁵ Copeland, H. E., A. Pocewicz, D. E. Naugle, T. Griffiths, D. Keinath, J. Evans, J. Platt. 2013. Measuring the effectiveness of conservation: a novel framework to quantify the benefits of sagegrouse conservation policy and easements in Wyoming. PLoS ONE 8(6): e67261. doi:10.1371/journal.pone.0067261. Available at www.plosone.org/article/doi/10.1371/journal.pone.0067261.⁶ Modeling indicates that the Wyoming sage-grouse core area conservation strategy, fully applied, plus \$250 million invested in targeted conservation easements, would slow, but not stop projected sage-grouse population declines in the state. The Wyoming core area policy prohibits or restricts surface occupancy within 0.6 miles of sage-grouse leks, generally limits development to one site per 640 acres, and limits cumulative surface disturbance to 5 percent per 640 acres in core habitat.⁶ Manier, D. J., D. J. A. Wood, Z. H. Bowen, R. M. Donovan, M. J. Holloran, L. M. Juliusson, K. S. Mayne, S. J. Oyler-McCance, F. R. Quamen, D. J. Saher, A. J. Titolo. 2013. Summary of science, activities, programs, and policies that influence the rangewide conservation of greater sage-grouse (Centrocercus urophasianus). U.S. Geological Survey, Open-File Report 2013-1098; available at http://pubs.usgs.gov/of/2013/1098/.</p>		<p>incorporated data from other agencies and sources, including but not limited to the U.S. Fish and Wildlife Service and Montana Fish, Wildlife and Parks. As a result of these actions, the BLM and the Forest Service gathered the necessary data essential to make a reasoned choice among the alternatives analyzed in detail in the DRMP/EIS, and provided an adequate analysis that led to an adequate disclosure of the potential environmental consequences of the alternatives see Chapter 4. As a result, the BLM and the Forest Service have taken a "hard look," as required by the NEPA, at the environmental consequences of the alternatives in the DRMP/EIS to enable the decision maker to make an informed decision. Finally, the BLM and the Forest Service have made a reasonable effort to collect and analyze all available data. The requisite level of information necessary to make a reasoned choice among the alternatives in an EIS is based on the scope and nature of the proposed decision. The baseline data provided in Chapter 3 and various appendices including in the B&PPNM RMP/EIS is sufficient to support, at the general land use planning-level of analysis, the environmental impact analysis resulting from management actions presented in the DRMP/EIS. A land use planning-level decision is broad in scope and, therefore, does not require an exhaustive gathering and monitoring of baseline data. Although the BLM and the Forest Service realize that more data could always be gathered, the baseline data provides the necessary basis to make informed land use plan-level decisions. Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions (BLM Land Use Planning Handbook H-1601-1, Chapter II, A-B at 11-13 and Chapter IV, B at 29; Forest Service Handbook 1909.12 – Land Management Planning). The BLM and the Forest Service will conduct subsequent project-specific NEPA analyses for projects proposed for implementation under the land use plan, which may include but are not limited to fuels treatment, habitat restoration, [etc.; list others as applicable]. The subsequent NEPA analyses for project-specific actions will tier to the land-use planning analysis and evaluate project impacts at the appropriate site-specific level (40 CFR 1502.20, 40 CFR 1508.28). As required by NEPA, the public will have the opportunity to participate in the NEPA process for site-specific actions.</p>
DR-MTDK-BL-13-0440-8	Wildlife	<p>In addition, the Montana BLM has endorsed and committed to implementing the Montana Prairie Dog Conservation Plan (Montana Prairie Dog Working Group 2002), which envisions at least two "Category 1" prairie dog complexes (suitable for establishment of a viable population of black-footed . 10,000 acres (Harris et al 1989)) in the state, as well as 20 complexes of 1,000 acres or more to accommodate associated species (not necessarily ferrets) and approximately 44,000 acres statewide in "Category 3" or scattered distribution to maintain</p>	N	<p>Thank you for the comment. According to the Glossary definition, page 5, "Black-footed ferret habitat: a complex of prairie dog towns within 1.5 kilometers of each other comprising a total of 1,000 acres.", there is no Category 1, black-footed ferret habitat, on public lands within the field office.</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		distribution and associated species needs. The distribution of prairie dogs in Montana makes it likely that one or a combination of these complexes is sited within the Billings planning area (see, e.g., Proctor et al. 2006b; Maxell et al. 2010; Luce 2008). While it is not BLM's sole responsibility to "designate" such complexes pursuant to the plan, it is BLM's duty to identify those lands that would qualify for conservation activity (or categorization) under BLM's policy guidance and the commitments made pursuant to the Montana statewide prairie dog management plan. Nowhere in the documents has the BLM identified potential Category 1, 2, or 3 designations, a task that would go far in meeting BLM's obligations and commitments. Utilizing the distributions of associate species such as mountain plover and burrowing owl (Figures 1, 2 and 3) would provide support for such identification.		
DR-MTDK-BL-13-0440-9	Wildlife	Given the opportunities to manage for at least part of the prairie dog distribution called for in the state plan, the Draft Billings RMP falls short of addressing the need to manage some sufficient quantity of BLM lands for at least associated species of black-tailed prairie dogs, and identifying, as a preliminary matter, where those colonies are situated. Again, our analysis of associated species such as the mountain plover (Figure 2, Montana Natural Heritage database combined records) and burrowing owl (Figure 3, Montana Natural Heritage database) show a high degree of overlap with prairie dog occupancy, indicating the importance of prairie dog habitats for these species. As these habitats prove to be less favorable with smaller colony size (n	Prairie dog towns and acreage are discussed in Chapter 3, pages 3-80 and 81. Due to the relatively small acreage of prairie dog towns on public land a map was not included. The most recent mapping projects are preliminary and could not be published at this time.
DR-MTDK-BL-13-0441-1	Travel mngt	I am very concerned about the changes that are being proposed as to closing roads, and trails on and around the Meeteetse Trail area, including the road I live on, Grove Creek rd. There should be no closing of public land.	n	Thank you for your comments. In regards to your comment, While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS. In regards to the vehicle route which you have identified, Grove Creek, BLM staff have reviewed the route designations and determined that the route is designated as "open" in the RMP and is not closed.
DR-MTDK-BL-13-0442-1	NEPA	plan, under other alternatives defers decisions on further coal leasing to a later time, relying on project specific analyses for future coal leasing but potentially necessitating changes to the RMP at some point in the future. This approach is short sighted and is not sufficient for the purpose of a management plan that will guide agency actions for many years. BLM should expand the purpose, and the alternatives analyzed, to address continuing coal exploration, leasing, and development within the Resource Management Area	N	Thank your for your comment.
DR-MTDK-BL-	Coal	The BLM states that "Surface owners of land overlying federal coal from both the Mammoth-Rehder and McCleary beds were consulted to determine their	N	The date when the surface owner consultation was conducted was added to the text. The coal screening process would be applied to future lease application

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
13-0442-10		preference for or against leasing of their land for surface mining. The results of the consultation are shown in Table 2.3. Federal coal was found unacceptable for further consideration where the surface owners responded negatively to surface mining." BLM did not mention that this consultation occurred in 1984 or earlier. Furthermore there has been no updated surface-owner consultation to support this draft RMP. Table 2.3 does not exist in Appendix M. SPE requests that coal screening be conducted in response to specific proposals using current data for future coal leasing actions		areas.
DR-MTDK-BL-13-0442-2	Coal	Signal Peak Energy recommends that all coal resources within the RMP be specifically included in the environmental analysis for future leasing potential. The Montana Bureau of Mines and Geology produces maps showing coal resources that should be unilaterally evaluated in this EIS for future exploration and leasing	N	The coal screening process will be applied to future lease application areas.
DR-MTDK-BL-13-0442-3	Coal	In its analysis of RMP alternatives, the BLM underestimates the potential for future development of coal by narrowly defining the reasonably foreseeable future as the continuing mining at the Signal Peak operations under current conditions. The analysis should be expanded to include considerations for expanded operation at the existing mine, additional exploration and potential leasing within a reasonable distance to the existing mine infrastructure and additional underground and surface mining new leases in all of the known areas of coal deposits. Signal Peak Energy currently operates at a permitted rate of 15 million tons of coal produced per year - a rate that is used for the environmental analyses in this EIS. However, the infrastructure in place at the operation could accommodate a throughput of 60 million tons of coal per year without major construction at the coal load out. It is reasonable to expect that market conditions may sustain such a production increase within the life of the RMP. State permits e.g. air permits, would require demonstrations of compliance with appropriate environmental standards if production rates increase. Site specific environmental evaluation of expansion at the site would be done by the state and, in the case of development of federal coal leases, by the BLM as well. These reasonably foreseeable conditions should be included in the Chapter 4 analysis	n	Thank you for your comment. Text has been added to reflect the role that SPE's existing coal processing and rail infrastructure may have regarding future coal development in the Bull Mountain coalfield.
DR-MTDK-BL-13-0442-4	Social/econ , Coal	Economic evaluations should also take into account future development of federal coal and expansion of Signal Peak operations. Currently, Signal Peak has 325 employees with an annual payroll of 539 million. Federal, state and local extractive taxes contribute an additional 540 million to the economy each year. With the addition of coal from Federal leases, additional employees may be added, and Federal lease payments will further contribute to the economy	N	Chapter 4 currently states the following: The average annual federal coal leasing, production, tax, and royalty revenues related to BLM federal minerals are unknown at this time and would be determined based on whether the proposed Montana Federal Mineral Conveyance Act (HR 1158) passes in Congress. For analysis purposes, under all Alternatives, it is assumed that all federal coal is retained in federal ownership, and a coal lease sale covering 2,680 acres of federal coal are leased, an annual average of 2.8 million tons of federal coal are produced over the life of the lease, and price per ton of coal in Montana is \$18.11 (Energy Information Administration, 2012). Future coal

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
				leasing is uncertain due to lack of infrastructure (e.g., rail lines) near potential coal reserves and low international coal prices.
DR-MTDK-BL-13-0442-5	Edits	Appendix B BMPs for mineral exploration and development should be clarified to reflect that these relate to oil and gas exploration and development. Not all of the recommendations are appropriate for coal exploration or development	n	Thank you for your comment. Text has been changed to reflect your comment.
DR-MTDK-BL-13-0442-6	Wildlife	The BLM proposes Mitigation Measures and Conservation Actions for Greater Sage Grouse Habitat. The recommended measures for solid minerals clearly do not reflect mining practices and appear to be more consistent with BLM's approach to development of fluid minerals. In describing its recommended practices for solid minerals, BLM appropriately recognizes the need to develop mitigation measures during activity level planning. Many of the recommendations for solid minerals are not appropriate, for a variety of reasons. First, coal is located where naturally deposited and recovery of coal must be done in an economically viable fashion where the coal is located. Location of surface disturbance and surface facilities may not be optional, particularly in the case of surface mining, and should only be evaluated on a site specific basis, not specified in a general BMP. While seasonal restrictions may be possible when using certain types of technologies e.g. coal gasification, it is inappropriate to unilaterally apply seasonal restrictions to solid mineral development without a clear recognition that the BLM is effectively withdrawing coal resources without the proper findings	n	Text has been modified in Chapter to specific to coal leasing. The BLM and the Forest Service complied with the NEPA by including a discussion of measures that may mitigate adverse environmental impacts of the alternatives in the DRMP/EIS. See 40 CFR 1502.14(f), 1502.16(h). Potential forms of mitigation include: (1) avoiding the impact altogether by not taking a certain action or parts of an action; (2) minimizing impacts by limiting the degree or magnitude of the action and its implementation; (3) rectifying the impact by repairing, rehabilitating, or restoring the affected environment; (4) reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; or (5) compensating for the impact by replacing or providing substitute resources or environments. 40 CFR 1508.20. Taking certain is only one of many potential forms of mitigation. The BLM and the Forest Service must include mitigation measures in an EIS pursuant to the NEPA; yet the BLM and the Forest Service have full discretion in selecting which mitigation measures are most appropriate, including which forms of mitigation are inappropriate.
DR-MTDK-BL-13-0442-7	Coal	Secondly, the BLM has erroneously attempted to apply strict BMP requirements proposed for fluid minerals development to solid minerals development without consideration of the nature of solid minerals extraction. Appendix AB includes BMPs for location of pipelines, roads and holding tanks - facilities that are connected with fluid minerals management but are generally only incidental to mining. Surface mining is often the most economic means of recovery of solid minerals, including coal, and by nature does not lend itself to seasonal restrictions as proposed in Appendix AB. If implemented as proposed, restrictions of activities to certain times and dates would have significant socioeconomic impact within the resource management area, potentially necessitating long furloughs for workers, reduction of production capacity and rendering certain mineral resources uneconomic	n	Text in Appendix B has been clarified to reflect your concerns .
DR-MTDK-BL-13-0442-8	Wildlife	Thirdly, the BLM has not provided sufficient rationale or basis for some of the restrictions. For example, BLM suggests that roads should not be designed to standards any higher than necessary to accommodate their intended purpose. While we are sure that the BLM does not intend for any road to be unsafe for travel, this restriction implies that only minimum safety standards can be used as a basis of design. SPE specifically objects to this requirement as safety (personnel and public) is the highest priority in our operations and we are unwilling to accept minimum standards. The restriction on ROW designations for	n	The BLM's FLPMA (Section 103(c)) defines "multiple use" as the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people. Accordingly, the BLM is responsible for the complicated task of striking a balance among the many competing uses to which public lands can be put. The BLM's multiple-use mandate does not require that all uses be allowed on all areas of the public lands. The purpose of the mandate is to require the BLM to evaluate and choose an appropriate balance of resource

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		<p>counties on mining development roads is not justified or supported by any rationale that show greater protection for sage grouse habitat. County maintenance of mine access roads is often the most safe, efficient and economic means to support transport of personnel, equipment and supplies to mine related activities such as exploration and operations and should not be precluded by some unsupported BMP</p>		<p>uses which involves tradeoffs between competing uses. The FLPMA also directs the United States (US) Department of the Interior, Bureau of Land Management (BLM) to develop and periodically revise or amend its Resource Management Plans (RMPs), which guide management of BLM-administered lands, and provides an arena for making decisions regarding how public lands would be managed and used.</p> <p>Consistent with the Multiple-Use Sustained-Yield Act of 1960 (16 U.S.C. 528–531) (MUSYA), the Forest Service manages National Forest System land to sustain the multiple use of its renewable resources in perpetuity while maintaining the long-term health and productivity of the land. Resources are managed through a combination of approaches and concepts for the benefit of human communities and natural resources. Land management plans guide sustainable, integrated resource management of the resources within the plan area in the context of the broader landscape, giving due consideration to the relative values of the various resources in particular areas. The Forest Service is required by statute to have a national planning rule: the Forest and Rangeland Renewable Resources Planning Act of 1974, as amended by the National Forest Management Act of 1976, requires the Secretary of Agriculture to issue regulations under the principles of the Multiple-Use Sustained-Yield Act of 1960 for the development and revision of land management plans.</p> <p>The B&PPNM RMP/EIS is a targeted amendment specifically addressing goals, objectives, and conservation measures to conserve greater sage-grouse and to respond to the potential of its being listed (Chapter 1 - Purpose and Need). Both, the Forest Service’s and BLM’s planning processes allow for analysis and consideration of a range of alternatives in the DRMP/EIS that identified and incorporated appropriate regulatory mechanisms to conserve, enhance, and restore greater sage-grouse habitat and to eliminate, reduce, or minimize threats to this habitat to ensure that a balanced management approach was recommended. The DRMP/EIS includes alternatives that provide a greater and lesser degree of restrictions in various use programs, but would not eliminate or invalidate any valid existing development rights.</p>
DR-MTDK-BL-13-0442-9	Wildlife	<p>Fourthly, the operations restrictions, in addition to the misapplication of fluid mineral restricted actions to solid minerals, do not necessarily provide the best environmental balance when evaluated on a project or site specific basis. For example, there are many requirements in this appendix referring to pit and impoundment construction that is not applicable to mining operations and include extraneous requirements not directly applicable to the greater sage grouse (e.g.: equip tanks and other above ground facilities with structures or devices that discourage nesting of raptors and corvids; eliminate threats from West Nile virus). Man camps are rarely used in solid minerals operations and sage grouse mitigation measures should be specifically designed for mining or</p>	n	<p>Thank you for your comment. The type of issues raised in your comment will be considered by the Billings Field Office during implementation of the Approved RMP when project-specific plans are prepared or evaluated</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		exploration activities that use them. The ROW siting requirement to reduce disturbance to sagebrush habitats may not be the best overall environmental option for a solid mineral project, when considering other resources and habitat types. Reclamation requirements for access roads and well pads is not appropriate for this section		
DR-MTDK-BL-13-0443-1	Locatable Minerals	Internal inconsistencies found throughout the DRMP/DEIS must be addressed. For example the amount of "sub-surface" or mineral acreage described is inconsistent. Chapter 3: Affected Environment quantifies 979,000 sub-surface acres under the BLM's jurisdiction (DRMP/DEIS Ch.3 at 3-241), while Chapters 1 and 2 quantify 1,839,782 mineral acres under BLM's jurisdiction, which is a significant difference of 860,782 acres. The above inconsistency needs to be revised before the Final EIS documents are published.	n	Thank you for your comment. The acreage numbers have been corrected.
DR-MTDK-BL-13-0443-10	Wildlife	Â However, the information provided to us by BLM did not specify what requirements, direction, measures, or guidance has been included in the newly revised RMPs to address threats to sage-grouse and sagebrush habitat. Therefore, we cannot assess their value or rely on them as regulatory mechanisms for the conservation of sage-grouse "Although RMPs, AMPs, and the permit renewal process provide an adequate regulatory framework, whether or not these regulatory mechanisms are being implemented in a manner that conserves sage-grouse is unclear (75 Fed. Reg. 13910 at 13975-77, emphasis added).	n	Lessons or improved management indicated by ongoing monitoring of implemented regulatory mechanisms effects on sage grouse populations will be implemented through "Adaptive Management" described in Section 2.3.4. This guidance will be supplemented with a Monitoring appendix in the RMP. During scoping for the B&PPNM RMP/EIS, individuals and conservation groups submitted management direction recommendations for protection and conservation of greater sage-grouse and their habitat. The recommendations, in conjunction with resource allocation opportunities and internal sub-regional BLM and the Forest Service input, were reviewed to develop the management direction for greater sage-grouse under Alternatives B and D. Conservation measures in the alternative are focused on PPH, PGH, and linkage/connectivity habitat. These areas have been identified by MTFWP in coordination with respective BLM and Forest Service offices.
DR-MTDK-BL-13-0443-12	Wildlife	Using this as a premise, BLM maintains the NTT Report conservation measures are required to respond to the WBP determination. The NTT Report does not use Manual 6840 or ESA as a foundation upon which to build. In fact, the NTT Report never references Manual 6840, nor does it explain the need for an entirely new regulatory approach. As such, it inappropriately discards an existing agency policy without ever justifying the radical change advanced in the NTT Report, and is thus arbitrary and capricious.11 Moreover, BLM identifies in the DRMP/DEIS that "[c]hanging existing laws, policies, and regulations" is out of scope for the RMP process (Ch. 1 at 17). To that end, the Final EIS documents should not be published until a full and detailed analysis of an additional alternative, that incorporates and analyzes full implementation of existing BMPs, Manual 6840, 2004 Strategy, and Fundamentals for Standards for Rangeland Health (43 CFR 4180.1) is included. NWMA contends that this additional alternative would fit the Purpose, Need, and Objectives of the DRMP/DEIS and would be consistent with FLPMA, the Mining Law of 1872, the Mining, Minerals	n	Thank you for your comment. The BLM and the Forest Service considered a reasonable range of alternatives during the greater sage-grouse planning process in full compliance with the NEPA. The CEQ regulations (40 CFR 1502.1) require that the BLM and the Forest Service consider reasonable alternatives that would avoid or minimize adverse impacts or enhance the quality of the human environment. While there are many possible alternatives or actions to manage public lands and greater sage-grouse in the planning area, the BLM and the Forest Service fully considered the management opportunities presented in the Analysis of the Management Situation (AMS) and the planning issues and criteria developed during the scoping process to determine a reasonable range of alternatives. As a result, four alternatives were analyzed in detail in the DRMP/EIS that best addressed the issues and concerns identified by the affected public. The range of alternatives in the DRMP/EIS represented a full spectrum of options including a no action alternative (current management, Alternative A).

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		and Policy Act, and BLM's sage-grouse conservation goals and objectives.		
DR-MTDK-BL-13-0443-13	NEPA	None of the alternatives give proper analysis to the existing conservation measures or authorities the BLM has to protect sage-grouse and its habitat. The DRMP/DEIS fails to include or even reference Manual 6840 in the Alternatives and Impact analyses. BLM must not ignore Manual 6840. NWMA recognizes that BLM generally describes Manual 6840 (DRMP/DEIS Ch. 3 at 3-75, 3-76), but then fails to provide discussion within the context of impacts of how any of the specific provisions of Manual 6840 meet, or fail to meet the objectives and goals set for the planning area. The DRMP/DEIS documents should evaluate the numerous directives in BLM Manual 6840 in the context of each Alternative Considered in Detail.	N	Thank your for your comment.
DR-MTDK-BL-13-0443-14	Wildlife	BLM fails to fully explain or adequately analyze how these measures (DRMP/DEIS Appendix B at B14, B35-39) are either adequate to conserve sage-grouse or inadequate to conserve sage-grouse, and therefore provides no useful baseline against which each of the proposed alternatives would be compared. The continuation of existing management and conservation measures and existing regulatory policies including the directives in BLM Manual 6840 must define the No Action Alternative. As is the case for all NEPA documents, the No Action Alternative provides the baseline against which all other alternatives must be compared and measured	n	The intent of the BMP's referenced on these pages is described on page B-1. In summary, BMPs are voluntary measures for reducing environmental impacts associated with certain classes of activity. BLM typically uses these measures as guidelines or "project design features" during implementation planning at the activity and/or project-specific levels. The No Action Alternative includes outdated resource management guidelines from the 1983 plan. BLM intends to rely on the latest research and best available science by utilizing existing research and incorporating other future research through the "Adaptive Management" approach described in Section 2.3.4, page 2-7.
DR-MTDK-BL-13-0443-15	Wildlife	DRMP/DEIS Ch. 4 at 4-246).BLM maintains this conclusion throughout the impact analysis specific to locatable minerals. NWMA agrees with these findings; however BLM fails to include other management actions or conservation measures currently in effect in the planning area that would have a positive effect on wildlife, such as habitat conservation improvements.	N	Thank you for your comment. Habitat improvement plans are implementation level documents and are therefore out of scope of this document. See the proposed actions (Chapter 2 and Appendix) for sage-grouse habitat management, including establishment of PHMAs, RA, and GHAs.
DR-MTDK-BL-13-0443-16	Locatable Minerals, wildlife	NWMA Recommendation No. 4: The Alternatives Described in Detail Should Consider Other Conservation Measures Besides those in the NTT Report- At least one additional alternative should be included that analyzes conservation measures that are not described in the NTT Report. Analysis of existing regulatory authorities including but not limited to BLM's Surface Management Regulations for locatable minerals at 43 CFR 3809 that allows for hardrock mineral development with mitigation to prevent unnecessary or undue degradation needs to be included.	n	Thank you for expressing your concerns. The BLM and the Forest Service considered a reasonable range of alternatives during the greater sage-grouse planning process in full compliance with the NEPA. The CEQ regulations (40 CFR 1502.1) require that the BLM and the Forest Service consider reasonable alternatives that would avoid or minimize adverse impacts or enhance the quality of the human environment. While there are many possible alternatives or actions to manage public lands and greater sage-grouse in the planning area, the BLM and the Forest Service fully considered the management opportunities presented in the Analysis of the Management Situation (AMS) and the planning issues and criteria developed during the scoping process to determine a reasonable range of alternatives. As a result, four alternatives were analyzed in detail in the DRMP/EIS that best addressed the issues and concerns identified by the affected public. The range of alternatives in the DRMP/EIS represented a full spectrum of options including a no action alternative (current management, Alternative A).

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
				43 CFR 3809 require the submittal of a Plan of Operations for any activities above Casual Use level in "proposed or listed threatened or endangered species or their proposed or designated critical habitat" (unless BLM allows for other action under a formal land-use plan or threatened or endangered species recovery plan;). Submittal of a Plan of Operations requires completion of an Environmental Assessment or Environmental Impact Statement to comply with NEPA. Mitigations to protect T and E species and their habitat would be developed through the NEPA process. Mitigation measures not protective of T and E species and their habitat would not meet the U or U criteria identified in the 43 CFR 3809 regulations.
DR-MTDK-BL-13-0443-17	Locatable Minerals	NWMA recognizes that BLM appropriately identified locatable mineral development as a primary issue in the DRMP/DEIS (Ch. 1 at 1-12, 1-13). However, BLM fails to provide for environmentally responsible mineral exploration and development, or recognize the Nation's need for domestic mineral sources, under Alternatives, B and D, the Preferred Alternative. BLM must acknowledge that it is required to fully consider the need for future mineral development along side with the need for conservation of resources.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS. The BLM is developing conservation measures which would allow mineral development to occur.
DR-MTDK-BL-13-0443-18	NEPA	NWMA Recommendation No. 5: Demonstrate Compliance with FLPMA- The DRMP/DEIS should discuss how the proposed land withdrawals and surface disturbing restrictions in sage-grouse priority and general habitat areas contained in each Alternative Considered in Detail, and the Agency Preferred Alternative comply with the FLPMA mandate to balance a wide range of resource values and uses of public lands including the directive in the Mining and Minerals Policy Act at 43 U.S.C. §1701(a)(12) and 30 U.S.C. §21(a) to recognize the Nation's need for domestic sources of minerals.	N	Thank you for your comment. The BLM must comply with all the applicable laws, regulations, policies, and acts.
DR-MTDK-BL-13-0443-19	Locatable Minerals	30 U.S.C. §22 ensures pre-discovery access, use, and occupancy rights to enter lands open to location for mineral exploration and development. Prohibiting mineral exploration and development on lands co-located with priority sage-grouse habitat, is contrary to the provisions under Section 22 of the General Mining Law, and therefore must be revised.	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS. Please see updated text in Chapter 4.
DR-MTDK-BL-13-0443-2	NEPA	The format of Chapter 4: Environmental Consequences is very difficult to use and is generally confusing due to convoluted numbering and internal references which require the reader/reviewer to flip through hundreds of pages of text. The format needs to be revised to allow for easy reference and clear headings or titles. For example, do not use numbering like " 4.6.5.6.15" instead simply title it "Impacts to Water Resources from Renewable Energy Development," this will eliminate any question as to what resource is being discussed. Further do not use internal references like "Impacts are the same as Alternative B;" instead	n	Thank you for your comment.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		describe the impacts, after all this section is supposed to be a complete description -“ not a summary of the impacts. In addition, throughout the DRMP/DEIS, BLM uses broad generalizations to describe activities. For example, "PPA's would be closed to future oil and gas leasing, exploration, and development, and grazing allotments would be designated"" (DRMP/DEIS Ch. 4 at 287). Does this mean all exploration and development, or only oil and gas exploration and development? The vague language, like that highlighted in the above example must be revised to eliminate any confusion as to what resource may be affected by a proposed management action.		
DR-MTDK-BL-13-0443-20	Locatable Minerals	Alternative B describes "closing exploration and development" in sage-grouse protection priority areas. Alternative D is described as "similar" to the surface disturbance and disruptive activities described under Alternative B (Table 2-7 at 2-185). Describing the management action as merely "similar" is inadequate; does this apply to the closure of locatable mineral exploration and development in protection priority areas? If so, the proposed "closure" is contrary to §22 of the General Mining Law. Moreover, exploration and development of locatable minerals cannot simply be "closed" without first being withdrawn. BLM does not have the authority to withdraw large areas of land; that power resides solely with Congress. As such the proposed "closures" are far outside BLM's authority and will not withstand legal scrutiny.	n	In response to your comment, [Table 2-7 at 2-191 in the DRMP] in the Proposed RMP and Final EIS has been modified to more clearly present that the implementation of the Alternatives would result in some public lands being recommended for withdrawal from locatable mineral entry under the mining laws. Please see page 2-191 table 2-7 2nd box
DR-MTDK-BL-13-0443-21	Locatable Minerals, wildlife	In addition, the impact analysis lacks any useful discussion regarding locatable mineral development and surface use restrictions within priority sage-grouse habitat, claiming that current and future bentonite development would not be affected because the claims are valid (DRMP/DEIS Ch. 4 at 4-445), which is particularly perplexing because almost all locatable mineral potential and present activity is located within Carbon County, which is co-located within priority habitat for sage-grouse. However, there is no meaningful discussion of how the proposed land withdrawals, prohibitions, and surface use restrictions will affect individuals attempting to assert their pre-discovery rights, as discussed above.	n	Thanks you for the comment. The statement on page 4-445, will be revised to read, "Although, the mining claims are valid, existing rights, current and future bentonite surface mining operations could be affected through the approval process and subject to additional mitigation. Areas recommended for withdrawal do not coincide with areas having development potential." Site specific impacts would be analyzed on a site specific basis.
DR-MTDK-BL-13-0443-22	Locatable Minerals	NWMA maintains that the cumulative impact to locatable minerals from the combined land withdrawals currently in place, as well as the future land withdrawals proposed in dozens of RMP revisions will have an inadequately defined and significant adverse effect on the hardrock mining industry, and this must be given thorough analysis in the DRMP/DEIS; otherwise it represents a significant flaw that renders the DRMP/DEIS incomplete. NWMA further contends that the direct, indirect, and cumulative impact analysis is inadequate and lacks convincing data as well as rationale that the impacts to mineral development are insignificant (See DRMP/DEIS Ch. 4).	n	Thank you for your comment. We believe the DRMP/DEIS accurately represents the effects on locatable mineral development. Cumulative impacts to locatable minerals must be evaluated in the context of potential for locatable minerals.
DR-MTDK-BL-13-0443-	Social/econ	The Regulatory Flexibility Act (RFA), as amended by the Small Business Regulatory Enforcement Fairness Act (SBREFA) requires BLM to analyze adequately the impacts of its proposal on small entities. The DRMP/DEIS does	n	Thank you for your comment. The economic analysis included in the RMP/EIS examines the potential impacts of withdrawing lands from mineral leasing by measuring the economic contributions associated with current foreseeable

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
23		not consider the adverse impact on small businesses of requiring validity exams in withdrawn or segregated lands, and is devoid of any analysis or discussion of the impact of sweeping and cumulative land withdrawals in priority sage-grouse. This is a significant omission and must be included in the socioeconomic analysis, especially because the proposed land withdrawals are co-located in areas with moderate to high mineral development (DRMP/DEIS Ch. 4 at 592, 593, 594). As BLM discovered in <i>Northwest Mining Association v. Babbitt</i> , 5 F.Supp.2d 9 (D.D.C. 1998), failure to comply with the RFA and SBREFA will invalidate a rulemaking. Therefore the Final EIS/RMP risks being invalidated if this issue is not addressed.		development alongside those associated with development anticipated under alternatives which propose land withdrawals. Although land withdrawals may hamper future economic activity in sectors specializing or supporting mineral development, it cannot be determined how these withdrawals would affect individual firms within these industries.
DR-MTDK-BL-13-0443-24	Locatable Minerals	NWMA Recommendation No. 8: Include a Detailed Socioeconomic Analysis of the Impacts Related to Locatable Minerals -" For each alternative, the DRMP/DEIS must re-evaluate the socioeconomic benefit or harm each alternative will have and disclose and quantify any adverse effects to job creation and local economies in light of BLM's own assertion that implementation of the Agency Preferred Alternative and Alternative B will have adverse impacts to locatable mineral development (DRMP DEIS Ch. 4 at 4-444).	n	Thank you for your comment. Levels would not change under any alternative. The analysis assumes they are valid claims and would be developed.
DR-MTDK-BL-13-0443-25	NEPA Wildlife,	NWMA Recommendation No. 9: The EIS Must Evaluate Ways to Minimize Adversely Affecting Private Property Rights- The land use restrictions, prohibitions, and withdrawals proposed pursuant IM 2012-044 and the NTT Report have significant potential to diminish landowners' rights to develop their private property if their lands have priority sage-grouse habitat or are located near priority sage-grouse habitat. The EIS must evaluate ways to minimize interfering with private property rights, including the rights associated with owning patented mining claims and fee mineral estates located in, adjacent to or near priority sage-grouse habitat.	n	Thank you for your comment. Per requirements of NEPA as noted above, the DRMP/EIS provided analysis of the effects of each alternative's actions on locatable mineral extraction. Socioeconomic impacts and the method of analysis are described in Section 4.3.1 of the DRMP/EIS. For each alternative, the DRMP/EIS describes the impacts on the region's locatable mineral extraction, regional housing, regional income, tax revenues, local government expenditures, population, housing, community stability and connectiveness, quality of life, and other social and community services. Under Alternative D, the pace of locatable mineral development and production and, therefore, the socioeconomic impacts, are expected to be very similar to Alternative A, the current management situation.
DR-MTDK-BL-13-0443-3	NEPA	As described below, NWMA does not support any of the Alternatives as they are drafted, Alternative B and Alternative C and D, the Preferred Alternative, do not recognize rights provided to individuals under the Mining Law of 1872 (General Mining Law, 43 U.S.C. 21a et seq), and are not consistent with provisions under the Federal Land Policy and Management Act of 1976 (FLPMA, 43 U.S.C 1701 et seq). In addition to being inconsistent with FLPMA and the General Mining Law Alternatives B, C, and D, the Preferred Alternative, are subject to Appendix AB, which proposes surface-disturbing restrictions that are not scientifically supported as required by the regulations that implement the National Environmental Policy Act (NEPA) at 40 C.F.R §1502.24	N	Thank you for your comment. (non substantive)
DR-MTDK-BL-13-0443-4	Wildlife	We also believe that IM 2012-044 and the NTT Report inappropriately jettison BLM's existing policies to protect candidate species, including the policies contained in BLM Manual 6840, "Special Status Species Management" (Manual	n	The NTT report (or BER, or COT) is not the sole source of management decisions for the range of alternatives. A National Technical Team (NTT) was formed as an independent, science-based team to ensure that the best

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		<p>6840). Instead, the DRMP/DEIS arbitrarily imposes a completely new regulatory framework without providing a reasonable explanation for doing so, and is therefore arbitrary and capricious.</p>		<p>information about how to manage the greater sage-grouse is reviewed, evaluated, and provided to the BLM and the Forest Service in the planning process. The group produced a report in December 2011 that identified science-based management considerations to promote sustainable greater sage-grouse populations. The NTT is staying involved as the BLM and the Forest Service work through the Strategy to make sure that relevant science is considered, reasonably interpreted, and accurately presented; and that uncertainties and risks are acknowledged and documented.</p> <p>A baseline environmental report, titled Summary of Science, Activities, Programs, and Policies That Influence the Rangeland Conservation of Greater Sage-grouse (<i>Centrocercus urophasianus</i>) (referred to as the BER), was released on June 3, 2013, by the U.S. Geological Survey. The peer-reviewed report summarizes the current scientific understanding about the various impacts to greater sage-grouse populations and habitats and addresses the location, magnitude, and extent of each threat. The BER does not provide management options. The report is being used by the BLM and the Forest Service in our efforts to develop regulatory mechanisms and improve our conservation efforts of the greater sage-grouse and its habitat to reduce the potential for listing it under the Endangered Species Act. The data for this report were gathered from BLM, Forest Service, and other sources and were the "best available" at the range-wide scale at the time collected. The report provides a framework for considering potential implications and management options, and demonstrates a regional context and perspective needed for local planning and decision-making.</p> <p>In March 2012, the FWS initiated a collaborative approach to develop range-wide conservation objectives for the greater sage-grouse to inform the 2015 decision about the need to list the species and to inform the collective conservation efforts of the many partners working to conserve the species. In March 2013, this team of State and FWS representatives, released the Conservation Objectives Team (COT) report based upon the best scientific and commercial data available at the time that identifies key areas for greater sage-grouse conservation, key threats in those areas, and the extent to which they need to be reduced for the species to be conserved. The report serves as guidance to Federal land management agencies, State greater sage-grouse teams, and others in focusing efforts to achieve effective conservation for this species.</p> <p>The range of alternatives is based upon analysis of public scoping comments as well as information provided in the NTT report, the BER, the COT report, and State management plans. The alternatives represent different degrees of and approaches to balancing resources and resource use among competing human interests, land uses, and the conservation of natural and cultural resource</p>

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
				values, while sustaining and enhancing ecological integrity across the landscape, including plant, wildlife, and fish habitat.
DR-MTDK-BL-13-0443-5	NEPA	The NEPA process requires an agency to rigorously explore and objectively evaluate all reasonable alternatives so that decision-makers and the public are fully informed. NEPA documents are intended to be used as a tool during the planning and decision-making process (40 C.F.R. §§1502.14(a), 1502.14(b),(d)). Substantial case law exists regarding the range of alternatives that need to be included in an Environmental Impact Statement (EIS), and "[t]he existence of a viable but unexamined alternative renders an environmental impact statement inadequate" (Resources Ltd. v. Robertson, 35 F.3d 1300, 1307 (9th Cir. 1993)). To that end, failing to analyze full and consistent implementation of Manual 6840, IM-2005-024: National Sage-Grouse Habitat Conservation Strategy (2004 Strategy), Fundamentals for Standards for Rangeland Health (43 C.F.R §4180.1), and existing Best Management Practices (BMPs) as an alternative (a "Manual 6840 Alternative") in the EIS documents is arbitrary and capricious and does not comply with NEPA requirements. Consequently, the Final EIS documents should not be published for public review until a detailed analysis of the Manual 6840 Alternative is included. Additionally, the failure to provide a detailed evaluation of Manual 6840 and other BLM policies pertaining to sage-grouse conservation is inconsistent with the guidance in Section 6.6 of BLM's NEPA Handbook (H-1790-1):	N	Thank you for your comment. This topic is discussed in Chapter 2 of the RMP/EIS. Four alternatives are presented for managing public lands within the Billings Field Office Planning Area to meet the purpose and need and to address the issues presented in Chapter 1.
DR-MTDK-BL-13-0443-6	NEPA	The analysis also contains broad generalization that the level of disturbance directly correlates to the level of adverse impact to species generally (DRMP/DEIS Ch. 4 at 4-236, 4-237, 4-238), but does not provide data to support that assertion.	N	Thank you for your comment.
DR-MTDK-BL-13-0443-7	NEPA	NWMA believes BLM's Preferred Alternative does not satisfy statutory requirements, does not balance BLM goals, objectives and policies, and is not the best solution to the purpose and need. BLM must provide detailed analysis that supports why the Preferred Alternative is in the best interest of the agency as well as the public. BLM's Land Use Planning Manual and Land Use Planning Handbook, II.A.7, pg. 22 (Rel. 1-1693 03/11/05), provides that BLM must identify how the Preferred Alternative best meets the multiple use and sustained yield requirements of FLPMA. The lack of meaningful analysis contained in the DRMP/DEIS constitutes a serious shortcoming that must be addressed. Consequently, the DRMP/DEIS is "inadequate as to preclude meaningful analysis" (40 CFR 1502.0(a)); and therefore the BLM must prepare and re-issue a revised draft which provides the analysis necessary to support each of the management alternatives, including the Preferred Alternative.	N	Thank you for your comment. Please see Chapter 4 for impact analysis of each of the alternatives.
DR-MTDK-BL-13-0443-8	Wildlife	However, precluding mineral development by way of validity exams and land withdrawals (See DRMP/DEIS Ch. 4 at 4-265, 4-444) does not accomplish the DRMP/DEIS' stated goal, or provide consistency with the mandate under	n	Thank you for your comment. Text in Chapter 4 had been edited for clarification. Please see 4.3.1.6.2. The BLM's FLPMA (Section 103(c)) defines "multiple use" as the management

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		<p>FLPMA or the Mining and Mineral Policy Act to recognize the Nation's need for domestic mineral sources. NWMA contends that full implementation of existing regulatory tools - " including required conservation and mitigation measures - " are adequate to ensure environmentally sound mineral development that is compatible with sage-grouse conservation.</p>		<p>of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people. Accordingly, the BLM is responsible for the complicated task of striking a balance among the many competing uses to which public lands can be put. The BLM's multiple-use mandate does not require that all uses be allowed on all areas of the public lands. The purpose of the mandate is to require the BLM to evaluate and choose an appropriate balance of resource uses which involves tradeoffs between competing uses. The FLPMA also directs the United States (US) Department of the Interior, Bureau of Land Management (BLM) to develop and periodically revise or amend its Resource Management Plans (RMPs), which guide management of BLM-administered lands, and provides an arena for making decisions regarding how public lands would be managed and used.</p> <p>Consistent with the Multiple-Use Sustained-Yield Act of 1960 (16 U.S.C. 528–531) (MUSYA), the Forest Service manages National Forest System land to sustain the multiple use of its renewable resources in perpetuity while maintaining the long-term health and productivity of the land. Resources are managed through a combination of approaches and concepts for the benefit of human communities and natural resources. Land management plans guide sustainable, integrated resource management of the resources within the plan area in the context of the broader landscape, giving due consideration to the relative values of the various resources in particular areas. The Forest Service is required by statute to have a national planning rule: the Forest and Rangeland Renewable Resources Planning Act of 1974, as amended by the National Forest Management Act of 1976, requires the Secretary of Agriculture to issue regulations under the principles of the Multiple-Use Sustained-Yield Act of 1960 for the development and revision of land management plans.</p> <p>The B&PPNM RMP/EIS is a targeted amendment specifically addressing goals, objectives, and conservation measures to conserve greater sage-grouse and to respond to the potential of its being listed. Both, the Forest Service's and BLM's planning processes allow for analysis and consideration of a range of alternatives in the DRMP/EIS that identified and incorporated appropriate regulatory mechanisms to conserve, enhance, and restore greater sage-grouse habitat and to eliminate, reduce, or minimize threats to this habitat to ensure that a balanced management approach was recommended. The DRMP/EIS includes alternatives that provide a greater and lesser degree of restrictions in various use programs, but would not eliminate or invalidate any valid existing development rights.</p>
DR-MTDK-BL-13-0443-9	NEPA	<p>To that end, BLM's failure to examine this viable alternative in the Draft RMP/DEIS will not withstand legal scrutiny pursuant to NEPA case law. Moreover, the alternatives analysis in the DRMP/DEIS does not satisfy BLM's</p>	N	<p>Thank you for your comment.</p> <p>Please see Chapter 2 for a discussion of alternative formation.</p>

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		own requirements for analyzing alternatives as set forth in its NEPA Handbook, H-1790-1, or the above-noted Purpose of the document because it fails to recognize the Nation's need for domestic sources of minerals, violates FLPMA, does not balance BLM's goals and objectives, and fails to incorporate appropriate management actions by opting for a one-size fits-all approach to conservation. The Final RMP/EIS must include a revised and expanded alternatives analysis.		
DR-MTDK-BL-13-0444-1	NEPA	Each Alternative in the DRMP/EIS includes a variation on a proposal to bury power lines that are <69kV voltage when feasible where wildlife conflicts exist without due consideration of what those conflicts may be.	n	Thank you for your comment.
DR-MTDK-BL-13-0444-2	Wildlife	A proposal common to all Alternatives is a requirement where wildlife conflicts exist, tall structures or power lines would be designed to include bird flight diverters to prevent bird strikes and perching by birds of prey. NWE wishes to point out that bird flight diverters are not designed to prevent perching by birds of prey on power lines nor would they be effective in this regard. The BLM may wish to revise this to avoid confusion	n	thank you for your comment.
DR-MTDK-BL-13-0444-3	NEPA	A topic very important to NWE is how the BLM intends to manage existing and future rights of way (ROW). Significant acreage is designated as "ROW avoidance" without adequate discussion, documentation or justification for the proposed prohibitions of ROW. Additionally, the DRMP/EIS indicates, that proposed ROW must be 'compatible with the purpose for which the area was designated' and "not otherwise feasible on lands outside the avoidance area." However, these statements do not specify any standards by which such determinations will be made. NWE recommends that BLM provide more definition to these statements that take into account the short-term nature of construction disturbance and the minimal residual impacts associated with power line and pipeline ROWS	n	See the Glossary. The definition of "Avoidance Areas" has been changed.
DR-MTDK-BL-13-0444-4	Wildlife	We caution the BLM, however, to not make land management decisions that benefit one use and unduly impact another. According to the BLM's Land Use Planning Manual and Land Use Planning Handbook, II.A.7, pg. 22 (Rel. 1A-1693 03/11/05), BLM must identify how the Preferred Alternative best meets the multiple use requirements of the Federal Land Policy Management Act. The DRMP/EIS includes several examples of where protection of sage grouse habitat results in added restrictions on existing or potential energy operations including wind power, overhead electric lines and natural gas production, operation, and distribution	n	The BLM's FLPMA (Section 103(c)) defines "multiple use" as the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people. Accordingly, the BLM is responsible for the complicated task of striking a balance among the many competing uses to which public lands can be put. The BLM's multiple-use mandate does not require that all uses be allowed on all areas of the public lands. The purpose of the mandate is to require the BLM to evaluate and choose an appropriate balance of resource uses which involves tradeoffs between competing uses. The FLPMA also directs the United States (US) Department of the Interior, Bureau of Land Management (BLM) to develop and periodically revise or amend its Resource Management Plans (RMPs), which guide management of BLM-administered lands, and provides an arena for making decisions regarding how public lands would be managed and used.

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				<p>Consistent with the Multiple-Use Sustained-Yield Act of 1960 (16 U.S.C. 528–531) (MUSYA), the Forest Service manages National Forest System land to sustain the multiple use of its renewable resources in perpetuity while maintaining the long-term health and productivity of the land. Resources are managed through a combination of approaches and concepts for the benefit of human communities and natural resources. Land management plans guide sustainable, integrated resource management of the resources within the plan area in the context of the broader landscape, giving due consideration to the relative values of the various resources in particular areas. The Forest Service is required by statute to have a national planning rule: the Forest and Rangeland Renewable Resources Planning Act of 1974, as amended by the National Forest Management Act of 1976, requires the Secretary of Agriculture to issue regulations under the principles of the Multiple-Use Sustained-Yield Act of 1960 for the development and revision of land management plans.</p> <p>The B&PPNM RMP/EIS is a targeted amendment specifically addressing goals, objectives, and conservation measures to conserve greater sage-grouse and to respond to the potential of its being listed. Both, the Forest Service’s and BLM’s planning processes allow for analysis and consideration of a range of alternatives in the DRMP/EIS that identified and incorporated appropriate regulatory mechanisms to conserve, enhance, and restore greater sage-grouse habitat and to eliminate, reduce, or minimize threats to this habitat to ensure that a balanced management approach was recommended. The DRMP/EIS includes alternatives that provide a greater and lesser degree of restrictions in various use programs, but would not eliminate or invalidate any valid existing development rights. For example, [insert one or more examples of the range of actions considered, include references to sections/table where they can be found].</p> <p>Additionally, the BLM and the Forest Service developed the B&PPNM RMP/EIS with involvement from cooperating agencies, including Montana Fish Wildlife and Parks, USFWS, Montana Governor’s Office, including several Montana counties within the planning area, etc. to ensure that a balanced multiple-use management strategy to address the protection of greater sage-grouse while allowing for utilization of renewable and nonrenewable resources on the public lands.</p>
DR-MTDK-BL-13-0444-5	Wildlife	NWE encourages the BLM to consider mitigation banks and offsite mitigation as mechanisms to pool habitat conservation resources and target conservation efforts in highest priority areas. In the development of such mitigation banks, the potential for future energy delivery corridors should be considered. For unknown impacts of operating and maintaining power lines, NWE recommends that the BLM provide opportunities and incentives to conduct additional studies using the research protocols developed by Utah Wildlife in Need in 2012 and endorsed by	n	The BLM and the Forest Service complied with the NEPA by including a discussion of measures that may mitigate adverse environmental impacts of the alternatives in the DRMP/EIS. See 40 CFR 1502.14(f), 1502.16(h). Potential forms of mitigation include: (1) avoiding the impact altogether by not taking a certain action or parts of an action; (2) minimizing impacts by limiting the degree or magnitude of the action and its implementation; (3) rectifying the impact by repairing, rehabilitating, or restoring the affected environment; (4)

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		the Western Association of Fish and Wildlife Agencies (WAFWA). As indicated by WAFWA, such research should be acceptable as a component of a mitigation package for unknown project impacts. In addition, NWE encourages the BLM to jointly identify potential sage-grouse incentives and partnerships with the electric and gas utility industry		reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; or (5) compensating for the impact by replacing or providing substitute resources or environments. 40 CFR 1508.20. Taking certain is only one of many potential forms of mitigation. The BLM and the Forest Service must include mitigation measures in an EIS pursuant to the NEPA; yet the BLM and the Forest Service have full discretion in selecting which mitigation measures are most appropriate, including which forms of mitigation are inappropriate.
DR-MTDK-BL-13-0447-1	Realty, Cadastral Survey, and Lands	The BLM include a stipulation to prevent impacts to split estate conservation easement properties. This could be facilitated via a no surface occupancy stipulation that precludes development on easement properties, similar to the protections provided in the draft RMP on split estate ownership with state-owned surface. Finally, the BLM could implement a controlled surface use stipulation that requires development to be compatible with the terms of the conservation easement. Under this stipulation the lessee and the land trust must develop and sign off on a mutually agreeable surface use plan before development may occur	n	Thank you for your comment. It will be taken under consideration.
DR-MTDK-BL-13-0447-2	NEPA	The BLM conduct an impacts analysis on split estate conservation easement properties. This analysis should identify where these lands are located and what the effects of BLM authorized activities would be to these lands. MLR would be happy to provide maps of all easements in the area that could potentially be impacted	n	Thank you for your comment.
DR-MTDK-BL-13-0448-1	Travel mngt, recreation	we offer these suggestions in lieu of seasonal closures:1. Erect additional signage in strategic places warning people that off road use is illegal and will result in a fine. This past week I noticed that there is a new narrow sign saying something like wilderness study behind this point. The inconspicuous sign is above the cirque on upper Burnt Timber Road. It is barely noticeable and is not explicit enough regarding what behavior it hopes to illicit. We are proposing harder to miss signs that make it clear that there are consequences of driving off the roads. These signs should be placed at all the entrances to the horse range and in places where off road use has occurred or is likely to occur.2. Create natural barriers (rocks, limbs, and logs), which prevent off road use in key areas of concern in all areas of the PMWHR. This falls in the "making the right thing easy and the wrong thing hard" category. Both BLM and TCF have done this and it has been effective in deterring people from creating new roads that others then follow, not even realizing they are driving illegally. We will continue to offer our help in creating these types of deterrents to going off road and we are open to suggestions on what type of deterrent might be most needed.3. Obviously, road improvements need to be made in strategic areas of concern (the rock pile on Sykes, wash outs in the making on both Burnt Timber and Sykes) as well as areas where drivers are veering off road. Most of these are not in the seasonal	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS Many of these comments are actually implementation-level actions which can be conducted without a RMP decision as part of existing regulation or policy and which are being done. Specifically: 1. All main access routes into the Pryors (both FS and BLM) already have regulatory signage on Kiosks at entrances and at a number of existing problem sites. 2. BLM already uses natural barriers to prevent illegal OHV use. 3. BLM already does road maintenance on vehicle routes, funding levels permitting. 4. Contact numbers are posted on entrance Kiosks, web pages, telephone books, agency offices, etc.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
		closure areas by the way. We appreciated the work of the Conservation Core the other day in putting poles along the road near the snow-fed waterhole atop the mountain. I believe these will be effective.4. TCF will report any downed trees that are blocking roads as quickly as we see them and will alert those "friends of the Pryors" to do the same. It would be good to know who in BLM to alert about this and the appropriate number to call or text. Texting is sometimes the only way to communicate, so a cell phone number would be a good thing for us to have. We believe that the four suggestions above will mitigate habitat degradation without preventing public access on the only roads open (other than snow mobile routes) during the April 15-June 15 time frame		
DR-MTDK-BL-13-0448-2	Recreation, Travel mgnt	Even more so than in summer when many people camp, tourists in the non-summer months tend to stay at local motels in Lovell, WY. They buy gas, supplies, and food at local stores. We believe that these factors should be considered in any decision to close off the roads as this could have a negative economic impact on the area	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS. Please see the socio- economics section of the RMP.
DR-MTDK-BL-13-0448-3	Travel mgnt	The other reason mentioned for seasonal road closure relates to the negative impact of vehicle use at this time on the viability of the herd during foaling season. In my 19 years of documenting the Pryor herd, I cannot recall a single case in which vehicle use resulted in the loss of a foal or deterred a stallion from breeding a mare. The herd is obviously a viable population or else there would be no need for population suppression through the use of PZP. Additionally, closure of Sykes Ridge above the old trap site will do little to help or hinder viability/foaling in April-June as foals are rarely born in this area, which would be closed	n	Thank you for expressing your concerns. While statements of opinion (including agreement or opposition) do not require specific responses or text revisions under NEPA regulations, they have been considered by the Billings Field Office and Montana State Office and documented in the administrative record associated with the Billings and Pompeys Pillar National Monument RMP/EIS. As mentioned in the RMP, the seasonal closure is for a number of reasons, not just for wild horse protection.
DR-MTDK-BL-13-0448-4	WILD HORSES, PMWHR	While it was dismissed from analysis, TCF believes that the expansion of the PMWHR on the North side of the PMWHR including Tony Island and Tony Island Spring area to the existing fence line beyond the Dryhead Overlook is critical to the long term survival of the herd and provides the public with viewing opportunities denied to those who do not have four wheel drive or high clearance vehicles. Expansion of the range into the highest elevations, where there is high quality forage, is more essential based on the projected temperature increases. The RMP indicates a 2-3 degree rise in temperature between 2010 and 2029. TCF strongly encourages BiFO to work with the CNF to accomplish this expansion	N	Thank you for your comment. BLM can only make land allocations on BLM administered lands.
DR-MTDK-BL-13-0448-5	WILD HORSES, PMWHR	The PMWHR 2009 Herd Management Area Plan (HMAP) prioritizes the important of maintaining rare colors and bloodlines. TCF recommends that the words rare colors be added to the RMP as well as no sex skewing and a review of AML based on the addition of the Administrative Pastures will be conducted with a revision to the high AML.	N	Thank you for your comments, but specific objectives for the herd would be part of a HMAP which is an implementation level planning document for the day to day management of the horses and the range.
DR-	WILD	The draft RMP does not discuss the lease situation between BiFO and Krueger	n	Thank you for your comment, but this is not a Land Use Planning Decision.

Comment Number	Topic	Comment Text	Changes Document (Y/N)	BLM Response to Comment
MTDK-BL-13-0448-6	HORSES, PMWHR	Land & Livestock Inc. Krueger L&L owns a parcel of land within the PMWHR, which includes all or a portion of the only permanent water source atop the mountain within the designated PMWHR. The Krueger land also contains vital summer grazing which takes on added importance as the horses are now restricted by a 2 mile-long fence from accessing their mid to late summer and fall, high elevation grazing in the Custer National Forest which includes the permanent water source on Tony Island. According to the BiFO, the lease is valid through September 30, 2017. Will BLM actively work with Krueger L&L to renew this lease? The land is currently for sale through a real estate company in Salt Lake City. We strongly encourage BiFO to include a discussion in the RMP about the future of this critical acreage		The situation where this property was for sale no longer exists.
DR-MTDK-BL-13-0455-1	lands with wilderness characteristics	The draft RMP states in at least two sections that LWCs is a high priority for BLM (p. 3-141 and K-1). In light of this priority, BLM should interpret liberally the qualifications for designation. The following areas should be reconsidered for LWC status: Much of Weatherman Draw meets the LWC qualifications, it is of high cultural significance, and former roads are rehabilitating. Bad Canyon has a stable population of native Yellowstone Cutthroat trout, is an important grizzly bear corridor, and there is no motorized access. While Tract 4 of the Pryor Mountain Unit is surrounded by roads, the two roads are redundant. If one was closed and the land rehabilitated, the area would qualify for LWC designation and would be an important addition to the adjoining WSA.	n	Thank you for your concerns and comments. BLM follows Manual 6301 in conducting its wilderness inventories and Manual 6302 when considering lands with wilderness characteristics during planning. These Manuals implement Secretarial Order 3310 and incorporates principles from BLM guidance (Organic Act directives) and legal rules developed as part of BLM's original wilderness inventories. Two of the units you mentioned (Bad Canyon, Weatherman Draw) do possess wilderness characteristics. Tract 4 of the Pryor Mountain Unit does not currently meet the size criteria. Please see Appendix K for details. You are correct to note that should one of the two mentioned vehicle routes be closed and-or become unusable for motorized use, that Tract 4 would then be adjacent to a WSA. Please note that the Billings Field Office has chosen a management direction in the chosen Alternative which do not specifically manage for lands with wilderness characteristics resource values but which have management actions which provide for protection of those resources, as in the case of Weatherman Draw and Bad Canyon.
DR-MTDK-BL-13-0455-2	Travel mngt	Consider closing the current road that bisects Demijohn Flat. It leads to the sensitive cultural area and does not have a clear ending point, which encourages people in motorized vehicles to drive further.	n	Thank you for your comments and your concern. We appreciate the interest in management of public lands. In regards to the Demijohn Flat route, the RMP has a range of possible decisions. In this case, due to the conditions you mentioned the Alternative D has been modified to reflect the current conditions. The route will be designated as "closed" for motorized use with the exception of administrative access. Refer to map 146

**Billings and Pompeys Pillar National
Monument**

**Resource Management Plan and
Environmental Impact Statement**

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**Billings and Pompeys Pillar National
Monument**

**Resource Management Plan and
Environmental Impact Statement**

Glossary

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1 Glossary

ACCRETED: Accreted lands are those lands that have been deposited by meandering river channels. The lands are effectively added to federal ownership and management. As a river channel changes lands are avulsed from one bank and accreted to the opposite bank, adding to acreage ownership on the opposite bank.

ACQUISITION: The Bureau of Land Management (BLM) acquires land, easements, and other real property rights when it is in the public interest and consistent with approved land use plans (LUPs). The BLM's land acquisition program is designed to: (1) improve management of natural resources through consolidation of federal, state, and private lands; (2) increase recreational opportunities, preserve open space, and/or ensure accessibility of public land; (3) secure key property necessary to protect endangered species and promote biological diversity; (4) preserve archaeological and historical resources; and (5) implement specific acquisitions authorized by Acts of Congress.

ACTIVE USE: Livestock grazing term meaning the current authorized use. Active use may constitute a portion, or all, of permitted use. Active use does not include temporary non-use or suspended use for forage within all or a portion of an allotment. (43 CFR 4100.0-5)

ACTIVITY PLAN: A type of implementation plan (see Implementation plan); an activity plan usually describes multiple projects and applies best management practices to meet land use plan objectives. Examples of activity plans include interdisciplinary management plans, habitat management plans, recreation area management plans, and allotment management plans. (H-1601, BLM Land Use Planning Handbook)

ACTUAL USE: Annual livestock grazing report describing where, how many, what kind or class of livestock, and how long livestock graze on an allotment, or on a portion or pasture of an allotment. (43 CFR 4100.0-5)

ADDITIONALITY: The conservation benefits of compensatory mitigation are demonstrably new and would not have resulted without the compensatory mitigation project. (adopted and modified from BLM Manual Section 1794)

ADMINISTRATIVE PURPOSES: Administrative use functions involving regular maintenance or operation of facilities or programs.

ADMINISTRATIVE USE: Official use related to management and resources of the public lands by federal, state, or local governments or non-official use sanctioned by an appropriate authorization instrument, such as right-of-way (ROW), permit, lease, or maintenance agreement.

AFFECTED ENVIRONMENT: The natural, physical, and human-related environment that is sensitive to changes from the alternatives.

AIR POLLUTION: The contamination of the atmosphere by any toxic or radioactive gases and particulate matter as a result of human activity.

AIR QUALITY: Air quality depends on the quantity and type of pollutants present in the atmosphere and the dispersion potential of an area to dilute those pollutants.

AIR QUALITY RELATED VALUE (AQRV): A resource identified by the Federal Land Management Agency for one or more Federal areas that may be adversely affected by a change in air quality. The resource may include visibility or a specific scenic, cultural, physical, biological, ecological, or recreational resource identified by the FLM for a particular area. AQRV impacts may also include sulfur, nitrogen, acid deposition, and lake acidification.

ALLOTMENT: An area of land designated and managed for grazing of livestock (43CFR 4100.0-5). An allotment may be grazed by one or more livestock operators. Allotments generally consist of BLM lands but may also include other federally managed, state-owned, and private lands. An allotment may include one or more separate pastures. Livestock numbers and periods of use are specified for each allotment.

ALLOTMENT MANAGEMENT PLAN (AMP): A document prepared in consultation with the grazing lessees or permittees involved, which applies to livestock operations on the public lands and which (1) prescribes the manner in, and extent to which livestock operations will be conducted in order to meet the multiple-use, sustained-yield, economic and other needs and objectives as determined for the lands by the Secretary concerned; and (2) describes the type, location, ownership, and general specifications for the range improvements to be installed and maintained on the lands to meet the livestock grazing and other objectives of land management; and (3) contains such other provisions relating to livestock grazing and other objectives found by the Secretary concerned to be consistent with the provisions of this Act and other applicable law (from FLPMA, Title 43 Chapter 35, Subchapter I 1702[k]).

ALLOWABLE SALE QUANTITY (ASQ): The gross amount of timber volume that may be sold annually from a specified area over a stated period of time in accordance with the management plan.

ALL-TERRAIN VEHICLE (ATV): A wheeled vehicle (other than a snowmobile) that is defined as having a wheelbase and chassis width of 50-inches or less, steered using handlebars, generally having a dry weight of 800-pounds or less, travels on three or more low-pressure tires, and has a seat designed to be straddled by the operator.

ALTERNATIVE: A mix of management prescriptions applied to specific land areas to achieve a set of goals and objectives. Each alternative represents a different way of achieving a set of similar management objectives.

AMENDMENT: The process for considering or making changes in the terms, conditions, and decisions of approved RMPs or management framework plans. Usually only one or two issues are considered that involve only a portion of the planning area. (H-1601, BLM Land Use Planning Handbook)

ANALYSIS OF THE MANAGEMENT SITUATION (AMS): Assessment of the current management direction. It includes a consolidation of existing data needed to analyze and resolve identified issues, a description of current BLM management guidance, and a discussion of existing problems and opportunities for solving them.

ANIMAL UNIT MONTH (AUM): The amount of forage necessary for the sustenance of one cow or its equivalent for a period of one month, approximately 800 pounds of forage. (43 CFR 4100.0-5)

APPEAL: Application for review of an implementation decision by a higher administrative level.

APPROPRIATE FIRE MANAGEMENT RESPONSE (AMR): Any specific action suitable to meet fire management objectives. Typically, eth AMR ranges across a spectrum of tactical options (from monitoring to intensive management actions). The response action is based on an evaluation of risks to firefighter and public safety, the circumstances under which the fire occurs, including weather and fuel conditions, natural and cultural resource management objectives, protection priorities, and values to be protected. The evaluation must also include an analysis of the context of the specific fire within the overall local, geographic area, or national wildland fire situation.

AREA OF CRITICAL ENVIRONMENTAL CONCERN (ACEC): Areas within the public lands where special management attention is required (when such areas are developed or used or where no development is required) (1) to protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources, or other natural systems or processes, or (2) to protect life and safety from natural hazards (FLPMA Section 103 (a)).

ASSESSMENT: The act of evaluating and interpreting data and information for a defined purpose (H-1601-1, BLM Land Use Planning Handbook).

ASSETS: Term utilized to describe roads, primitive roads, and trails that comprise the transportation system. Also the general term utilized to describe all BLM constructed “Assets” contained within the Facility Asset Management System.

ATMOSPHERIC DEPOSITION: Air pollution produced when acid chemicals are incorporated into rain, snow, fog or mist and fall to the earth. Sometimes referred to as “acid rain” and comes from sulfur oxides and nitrogen oxides, products of burning coal and other fuels and from certain industrial processes. If the acid chemicals in the air are blown into areas where the weather is wet, the acids can fall to earth in the rain, snow, fog, or mist. In areas where the weather is dry, the acid chemicals may become incorporated into dust or smoke.

ATTAINMENT AREA: A geographic area in which criteria air pollutant levels meet the health-based primary standard (national ambient air quality standard (NAAQS) for the pollutant. An area may have on acceptable level for one criteria air pollutant but may have unacceptable levels for others. Thus, an area could be attainment and

nonattainment simultaneously. Attainment areas are defined using federal pollutant limits set by EPA.

AUTHORIZED OFFICER: The federal employee who has the delegated authority to make a specific decision.

AVOIDANCE AREA: Areas determined to be less suitable for a ROW because of (1) important and/or valued resources or resources assigned to a special status, or (2) a substantive conflict with use. These areas exhibit constraints to siting facilities and are less desirable for a ROW but could be mitigated to reduce potential effects the ROW might have on the environment.

AVOIDANCE MITIGATION: Avoiding the impact altogether by not taking a certain action or parts of an action (40 CFR 1508.20(a)) (e.g. may also include avoiding the impact by moving the proposed action to a different time or location).

AVULSED: Avulsed lands are those lands which have been eroded by meandering river channels. The lands are effectively removed from federal ownership and management. As a river channel changes lands are avulsed from one bank and accreted to the opposite bank, adding to acreage ownership on the opposite bank.

BACKCOUNTRY BYWAYS: Vehicle routes that traverse scenic corridors using secondary or backcountry road systems. National backcountry byways are designated by the type of road and vehicle needed to travel the byway.

BANKHEAD-JONES LAND USE LANDS: Formerly privately owned sub-marginal farmlands incapable of producing sufficient income to support the family of a farm owner and acquired by the United States, purchased under Title III of the Bankhead-Jones Farm Tenant Act of July 22, 1937. These acquired lands became known as land utilization projects and were subsequently transferred from jurisdiction of the USDA to the US-DOI. They are now administered by the BLM.

BASAL AREA: The cross-sectional area of a single stem, including the bark, measured at breast height (4.5 feet above the ground).

BASELINE: The pre-existing condition of a defined area and/or resource that can be quantified by an appropriate metric(s). During environmental reviews, the baseline is considered the affected environment that exists at the time of the review's initiation, and is used to compare predictions of the effects of the proposed action or a reasonable range of alternatives.

BENEFICIAL OUTCOMES: Also referenced as "recreation benefits"; improved conditions, maintenance of desired conditions, prevention of worse conditions, and the realization of desired experiences.

BEST MANAGEMENT PRACTICES (BMPs): A suite of techniques that guide or may be applied to management actions to aid in achieving desired outcomes. Best management practices are often developed in conjunction with LUPs, but they are not considered a

LUP decision unless the LUP specifies that they are mandatory. They may be updated or modified without a plan amendment if they are not mandatory. (H-1601, BLM Land Use Planning Handbook)

BIG GAME: Indigenous, ungulate (hoofed) wildlife species that are hunted, such as elk, deer, bison, bighorn sheep, and pronghorn antelope.

BIOLOGICAL ASSESSMENT (BA): The document prepared by or under the direction of BLM concerning listed and proposed species and designated and proposed critical habitat that may be present in the action area and contains the BLM's determination of potential effects of the action on such species and habitat. Biological assessments are required for formal consultations and conferences on "major construction projects." They are recommended for all formal consultations and formal conferences and many informal consultations where a written evaluation of the effects of an action on listed or proposed species and on designated or proposed critical habitat is needed. (M-6840, *Special Status Species Manual*).

BIOLOGICAL CRUST: Microorganisms (e.g., lichens, algae, cyanobacteria, micro fungi) and non-vascular plants (e.g., mosses, lichens) that grow on or just below the soil surface. Synonym: microbiotic crust and cryptogamic crust. (BLM 2005c TR 1734-06 Interpreting Indicators of Rangeland Health, Version 4 (2005))

BIOLOGICAL OPINION (BO): The document which includes: (1) the opinion of the USFWS as to whether or not a federal action is likely to jeopardize the continued existence of listed species or result in the destruction of adverse modification of designated critical habitat, (2) a summary of the information on which the opinion is based, and (3) a detailed discussion of the effects of the action on listed species or designated critical habitat. Depending upon the determination of jeopardy or non-jeopardy, the BO may contain reasonable and prudent alternatives, a statement of anticipated take of listed animals, and conservation recommendations for listed plants. (M-6840, *Special Status Species Manual*).

BIOLOGICALLY SIGNIFICANT UNIT (BSU): A Biologically Significant Unit for this plan is the summary of all the Priority Habitat Management Areas within a Greater Sage-Grouse population as delineated in the COT report.

BLACK-FOOTED FERRET HABITAT: A complex of prairie dog towns within 1.5 kilometers of each other comprising a total of 1,000 acres (Biggens 1993, Biggens et al. 2006).

BOARD FOOT: The amount of wood contained in an unfinished board 1 inch thick, 12 inches long, and 12 inches wide; abbreviated bd ft (1,000 bd ft is written as 1 MBF and 1,000,000 BF is written as 1 MMBF).

CANDIDATE SPECIES: Taxa for which the US Fish and Wildlife Service has sufficient information on their status and threats to propose the species for listing as endangered or threatened under the Endangered Species Act, but for which issuance of a proposed rule is currently precluded by higher priority listing actions. Separate lists for plants,

vertebrate animals, and invertebrate animals are published periodically in the Federal Register (M-6840, Special Status Species Manual).

CANOPY: The continuous cover formed by tree crowns consisting of one or several layers.

CASUAL USE: Activities that involve practices that do not ordinarily disturb or damage the public lands, resources, or improvements and, therefore, do not require a ROW grant or temporary use permit (43 CFR 2800). Also, any short-term noncommercial activity that does not damage or disturb the public lands, their resources, or improvements and that is not prohibited by closure of the lands to such activities (43 CFR 2920). Casual use generally includes collecting geochemical, rock, soil, or mineral specimens using hand tools, hand panning, and non-motorized sluicing. It also generally includes use of metal detectors, gold spears, and other battery-operated devices for sensing the presence of minerals, and hand battery-operated dry washers. Casual use does not include use of mechanized earth-moving equipment, truck mounted drilling equipment, suction dredges, motorized vehicles in areas or on routes designated as closed to off-road vehicles, chemicals, or explosives. It also does not include occupancy or operations where the cumulative effects of the activities result in more than negligible disturbance.

CAVE: A cave or cavern is a natural underground space large enough for a human to enter. Some people suggest that the term cave should only apply to cavities that have some part that does not receive daylight; however, in popular usage, the term includes smaller spaces like rock shelters and grottos.

CLOSED: Generally denotes that an area is not available for a particular use or uses. For example, 43 CFR 8340.0-5 sets forth the specific meaning of “closed” as it relates to off-highway vehicle (OHV) use, and 43 CFR 8364 defines “closed” as it relates to closure and restriction orders. (H-1601-1, *BLM Land Use Planning Handbook*).

CODE OF FEDERAL REGULATIONS (CFR): The official, legal tabulation or regulations directing Federal Government activities. (BLM National Management Strategy for OHV Use on Public Lands)

CO-DOMINANT: A tree whose crown helps to form the general level of the main canopy.

COLLABORATION: A cooperative process in which interested parties, often with widely varied interests, work together to seek solutions with broad support for managing public and other lands. (H-1601, *BLM Land Use Planning Handbook*)

COMMERCIAL THINNING: Any type of thinning producing merchantable material at least equal to the value of the direct costs of harvesting.

COMMUNITY RECREATION-TOURISM MARKET: A community or communities dependent on public lands recreation or related tourism use, growth, or development. Major investments in facilities and visitor assistance are authorized within SRMAs where the BLM’s strategy is to target demonstrated community recreation-tourism market demand. Here, recreation management actions are geared toward meeting primary recreation-tourism market demand for specific activity, experience, and benefit

opportunities. These opportunities are produced through maintenance of prescribed natural resource or community setting character and by structuring and implementing management, marketing, monitoring, and administrative actions accordingly.

COMPENSATORY MITIGATION: Compensating for the (residual) impact by replacing or providing substitute resources or environments (40 CFR 1508.20).

COMPENSATORY MITIGATION PROJECTS: The restoration, creation, enhancement, and/or preservation of impacted resources (adopted and modified from 33 CFR 332), such as on-the-ground actions to improve and/or protect habitats (e.g. chemical vegetation treatments, land acquisitions, conservation easements). (adopted and modified from BLM Manual Section 1794).

COMPENSATORY MITIGATION SITES: The durable areas where compensatory mitigation projects will occur. (adopted and modified from BLM Manual Section 1794).

COMPREHENSIVE TRAVEL MANAGEMENT: The proactive interdisciplinary planning; on-the-ground management and administration of travel networks (both motorized and non-motorized) to ensure public access, natural resources, and regulatory needs are considered. It consists of inventory, planning, designation, implementation, education, enforcement, monitoring, easement acquisition, mapping and signing, and other measures necessary to provide access to public lands for a wide variety of uses (including uses for recreational, traditional, casual, agricultural, commercial, educational, and other purposes).

CONDITIONS OF APPROVAL (COA): Conditions of approval are the conditions or provisions (requirements) under which an application for a permit to drill or a sundry notice is approved.

CONDITION CLASS (fire regimes): Fire regime condition classes are a measure describing the degree of departure from historical fire regimes, possibly resulting in alterations of key ecosystem components, such as species composition, structural stage, stand age, canopy closure, and fuel loadings. One or more of the following activities may have caused this departure: fire suppression, timber harvesting, livestock grazing, introduction, and establishment of exotic plant species, introduced insects or disease, or other management activities.

CONDITION CLASS 1: Fire regimes are within a historical range, and the risk of losing key ecosystem components from fire is low. Vegetation attributes (species composition and structure) are intact and functioning within an historical range.

CONDITION CLASS 2: Fire regimes have been moderately altered from their historical range. The risk of losing key ecosystem components from fire is moderate. Fire frequencies have departed from historical frequencies by one or more return intervals (increased or decreased). This results in moderate changes to one or more of the following: fire size, frequency, intensity, severity, and landscape patterns. Vegetation attributes have been moderately altered from their historical range.

CONDITION CLASS 3: Fire regimes have been altered significantly from their historical ranges. The risk of losing key ecosystem components from fire is high. Fire frequencies have departed from historical frequencies by multiple return intervals. This action results in dramatic changes to one or more of the following: fire size, frequency, intensity, severity, and landscape patterns. Vegetation attributes have been altered significantly from their historical range.

CONFORMANCE: A proposed action shall be specifically provided for in the land-use plan, or if not specifically mentioned, shall be clearly consistent with the goals, objectives, or standards of the approved land use plan. (H-1601, BLM Land Use Planning Handbook)

CONIFER: A tree or shrub of the order Coniferae with cones and needle-shaped or scale like leaves.

CONIFEROUS: Pertaining to conifers, which bear woody cones containing naked seeds.

CONSERVATION AGREEMENT: A formal signed agreement between the US Fish and Wildlife Service and other parties that implement specific actions, activities, or programs designed to eliminate or reduce threats to, or otherwise improve the status of, a species. Conservation agreements can be developed at a state, regional, or national level and generally include multiple agencies at both the state and federal level, as well as tribes. Depending on the types of commitments the BLM makes in a conservation agreement and the level of signatory authority, plan revisions or amendments may be required before the conservation agreement is signed or subsequently in order to implement the conservation agreement. (M-6840, Special Status Species Manual)

CONSERVATION STRATEGY: A strategy outlining current activities or threats that are contributing to the decline of a species, along with the actions or strategies needed to reverse or eliminate such a decline or threats. Conservation strategies are generally developed for species of plants and animals that are designated as BLM sensitive species or that have been determined by the USFWS to be federal candidates under the ESA.

CONTROLLED SURFACE USE: Use and occupancy is allowed (unless restricted by another stipulation), but identified resource values require special operational constraints that may modify the lease rights. CSU is used for operating guidance, not as a substitute, for the No Surface Occupancy (NSO) or timing stipulations. (2) Stipulations to be attached to oil and gas leases to protect specific areas or resources, such as riparian and wetland areas, rivers, sensitive species, viewsheds, and watersheds.

COOPERATING AGENCY: The Council on Environmental Quality (CEQ) regulations implementing National Environmental Policy Act (NEPA) define a cooperating agency as any agency that has jurisdiction by law or special expertise for proposals covered by NEPA (40 CFR 1501.6). Any federal, state, local government jurisdiction with such qualifications may become a cooperating agency by agreement with the lead agency. (H-1601, BLM Land Use Planning Handbook)

CORD: A stack of fuelwood that measures 4 foot by 4 foot by 8 foot (128 cubic feet) including wood, bark, and air space within the stack.

COUNCIL ON ENVIRONMENTAL QUALITY (CEQ): CEQ is an advisory council to the President of the U.S. established by the National Environmental Policy Act of 1969. It reviews federal programs to analyze and interpret environmental trends and information.

CREMAINS: Cremated human remains. Cremated remains are not considered a hazardous substance. (WO IM-2011-159)

CRITICAL HABITAT: (1) The specific areas within the geographical area currently occupied by a species, at the time it is listed in accordance with the ESA, on which are found those physical or biological features (i) essential to the conservation of the species and (ii) that may require special management considerations or protection, and (2) specific areas outside the geographical area occupied by a species at the time it is listed on determination by the USFWS and/or NMFS that such areas are essential for the conservation of the species. Critical habitats are designated in 50 CFR Parts 17 and 226. The constituent elements of critical habitat are those physical and biological features of designated or proposed critical habitat essential to the conservation of the species, including, but not limited to: (1) space for individual and population growth, and for normal behavior; (2) food, water, air, light, minerals, or other nutritional or physiological requirements; (3) cover or shelter; (4) sites for breeding, reproduction, rearing of offspring, germination, or seed dispersal; and (5) habitats that are protected from disturbance or are representative of the historic geographic and ecological distributions of a species. (M6840, Special Status Species Manual)

CROWN: The part of the tree or woody plant bearing live branches and foliage.

CRUCIAL VALUE HABITAT: Any particular range or habitat component that directly limits a community, population, or subpopulation to reproduce and maintain itself at a certain level over the long-term. Those sensitive use areas that, because of limited abundance and/or unique qualities, constitute irreplaceable critical requirements for high interest wildlife. This may also include highly sensitive habitats, including fragile soils that have little or no reclamation potential. Restoration or replacement of these habitats may not be possible. Examples include the most crucial (critical) summer and/or winter range or concentration areas; critical movement corridors; breeding and rearing complexes; spawning areas; developed wetlands; Class 1 and 2 streams, lake, ponds or reservoirs; and riparian habitats critical to high interest wildlife.

CRUCIAL WINTER RANGE: That part of the winter range where a high proportion of the species' population is located during severe winter conditions.

CULTURAL RESOURCES or CULTURAL PROPERTY: A definite location of human activity, occupation, or use identifiable through field inventory (survey), historical documentation, or oral evidence. The term includes archaeological, historic, or architectural sites, structures, or places with important public and scientific uses and

may include definite locations (sites or places) of traditional cultural or religious importance to specified social and/or cultural groups. (Cf. “traditional lifeway value”; see “definite location.”) Cultural resources are concrete, material places and things that are located, classified, ranked, and managed through the system of identifying, protecting, and utilizing for public benefit described in this Manual series. (M-8100-1, BLM Cultural Resources Management)

CULTURAL RESOURCE INVENTORY CLASSES: There are three cultural resource inventory classes as identified in M-8100-1, BLM Cultural Resources Management.

1. Class I-existing data inventory. A study of published and unpublished documents, records, files, registers, and other sources, resulting in analysis and synthesis of all reasonably available data. Class I inventories encompass prehistoric, historic, and ethnological/sociological elements and are in large part chronicles of past land uses. They may have major relevance to current land use decisions.

2. Class II-sampling field inventory. A statistically based sample survey designed to help characterize the probable density, diversity, and distribution of archaeological properties in a large area by interpreting the results of surveying limited and discontinuous portions of the target area.

3. Class III-intensive field inventory. A continuous, intensive survey of an entire target area, aimed at locating and recording all archaeological properties that have surface indications, by walking close-interval parallel transects until the area has been thoroughly examined. Class III methods vary geographically, conforming to the prevailing standards for the region involved. (M-8100-1, BLM Cultural Resources Management)

CUMULATIVE EFFECT: The impact on the environment resulting from the impact of one action added to other past, present, and reasonable foreseeable future actions regardless of what agency (federal or nonfederal) or person undertakes such other actions.

Cumulative impacts can result from individually minor but collectively significant actions taking place over time. (H-1790-1, BLM NEPA Handbook)

DEFERRED ROTATION: Rotation grazing with regard to deferring pastures turn-out dates beyond the growing season, if they were used early the prior year, or that have been identified as needing deferment for resource reasons.

DESIGNATED ROADS, PRIMITIVE ROADS, AND TRAILS: Specific roads, primitive roads, and trails identified by the BLM (or other agency) where some type of motorized vehicle use is appropriate and allowed, either seasonally or year-long (from MS-1626).

DESIGN VALUE: A statistic that describes the air quality status of a given location relative to the level of the National Ambient Air Quality Standards (NAAQS). Design values are defined to be consistent with the individual NAAQS in terms of their averaging times and their statistical formats.

DESIRABLE NON-NATIVE: Any species not naturally occurring within a given area, which independently or in conjunction with other species contributes beneficially to a site’s ecological function, recovery, or the desired future condition of a site.

DESIRED CONDITION: Description of those factors that should exist within ecosystems to maintain their survival and to meet social and economic needs.

DESIRED OUTCOMES: A type of land use plan decision expressed as a goal or objective.

DESTINATION RECREATION-TOURISM MARKET: This market is composed of national or regional recreation-tourism visitors and other constituents who value public lands as recreation-tourism destinations. Major investments in facilities and visitor assistance are authorized within SRMAs where the BLM's strategy is to target demonstrated destination recreation-tourism market demand. Here, recreation management actions are geared toward meeting primary recreation-tourism market demand for specific activity, experience, and benefit opportunities. These opportunities are produced through maintenance of prescribed natural resource setting character and by structuring and implementing management, marketing, monitoring, and administrative actions accordingly.

DIAMETER AT BREAST HEIGHT (DBH): Standard measurement of a tree's diameter, usually taken at 4.5 feet above the ground.

DISPERSED RECREATION: Recreation activities of an unstructured type that are not confined to specific locations or dependent on recreation sites. Examples of these activities may be hunting, fishing, off-road vehicle use, hiking, and sightseeing.

DISPOSAL: Transfer of public land out of federal ownership to another party through sale, exchange, Recreation and Public Purposes Act of 1926, Desert Land Entry or other land law statutes.

DISRUPTIVE ACTIVITIES: Those uses and activities that are likely to alter the behavior of, displace, or cause excessive stress to wildlife populations occurring at a specific location and/or time. In this context, disruptive activity(ies) refers to those actions that alter behavior or cause the displacement of wildlife such that reproductive success is negatively affected, or the physiological ability to cope with environmental stress is compromised. This term does not apply to the physical disturbance of the land surface, vegetation, or features. Examples of disruptive activities may include fence construction, noise, vehicle traffic, or other human presence regardless of the activity. The term is used in conjunction with protecting wildlife during crucial life stages (for example, breeding, nesting, birthing, etc.), although it could apply to any resource value. This definition is not intended to prohibit all activities or authorized uses.

These definitions are not intended to prohibit all activities or authorized uses. For example, emergency activities (fire suppression, search and rescue, etc.), or rangeland monitoring, dispersed recreational activities (hunting, hiking, etc.), and livestock grazing are not considered surface-disturbing or disruptive activities.

DOMINANT: A tree whose crown extends above the general level of the main canopy.

DURABILITY (PROTECTIVE and ECOLOGICAL): The maintenance of the effectiveness of a mitigation site and project for the duration of the associated impacts, which includes

resource, administrative/legal, and financial considerations. (adopted and modified from BLM Manual Section 1794)

EASEMENT: An interest in land entitling the owner or holder, as a matter of right, to enter upon land owned by another party for a particular purpose.

ECOLOGICAL SITE: A kind of land with a specific potential natural community and specific physical site characteristics, differing from other kinds of land in their ability to produce distinctive kinds and amounts of vegetation and to respond to management. Ecological sites are defined and described with information about soil, species composition, and annual production.

ECOLOGICAL SITE DESCRIPTION: Description of the soils, uses, and potential of a kind of land with specific physical characteristics to produce distinctive kinds and amounts of vegetation. (Interpreting Indicators of Rangeland Health)

ECOSYSTEM: Organisms together with their abiotic environment, forming an interacting system, inhabiting an identifiable space. (Society for Range Management)

ELIGIBLE RIVER: A river or river segment found eligible for inclusion into the National Wild and Scenic Rivers System through the determination that it is free-flowing and, with its adjacent land area, possesses one or more river-related outstandingly remarkable values. (Wild and Scenic Rivers Act)

EMERGENCY STABILIZATION AND REHABILITATION (ESR): Prompt action(s) following a wildfire that are necessary to stabilize and prevent unacceptable degradation to natural and cultural resources, minimize threats to life and property, repair lands unlikely to recover, and repair or replace minor facilities damaged by fire.

ENDANGERED SPECIES: An endangered species is defined as any species that is in danger of extinction throughout all or a significant portion of its range (BLM Manual 6840, Special Status Species Manual).

ENVIRONMENTAL ASSESSMENT (EA): A concise public document for which a federal agency is responsible that serves to (1) briefly provide sufficient evidence and analysis for determining whether to prepare an environmental impact statement or a finding of no significant impact, (2) aid an agency's compliance with the NEPA when no environmental impact statement is necessary, and (3) facilitate preparation of an environmental impact statement when one is necessary. (40 CFR 1508.9)

ENVIRONMENTAL IMPACT STATEMENT (EIS): A detailed written statement as required by Section 102 (2) of the NEPA, which states that all agencies of the Federal Government shall include in every...major federal action significantly affecting the quality of the environment, a detailed statement prepared by the responsible official on (1) the environmental impacts of the proposed action, (2) any adverse environmental effects that cannot be avoided should the proposal be implemented, (3) alternatives to the proposed action, (4) the relationship between local short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and (5)

any irreversible and irretrievable commitments of resources that would be involved in the proposed action, should it be implemented. (40 CFR 1508.11 and the NEPA of 1969)

EPHEMERAL STREAM: A stream that flows only in direct response to precipitation, and whose channel is at all times above the water table. Generally, ephemeral streams do not flow continuously for more than 30 days and have more robust upland vegetation than found outside the ephemeral riparian wetland area.

EXISTING WAY: A way existing at the time that a Wilderness Study Area survey was completed.

EVALUATION (plan evaluation): The process of reviewing the land use plan and the periodic plan monitoring reports to determine whether the land use plan decisions and NEPA analysis are still valid and whether the plan is being implemented.

EXCEEDANCE: With respect to a national ambient air quality standard means one occurrence of a measured or modeled concentration greater than the specified concentration level of such standard for the averaging period (1-hr, 3-hr, 8-hr, 24-hr, or annual) specified by the standard.

EXCEPTIONAL EVENT: An event that affects air quality, is not reasonably controllable or preventable, is an event caused by human activity that is unlikely to recur at a particular location or a natural event, and is determined by the EPA Administrator in accordance with 40 CFR 50.14 to be an exceptional event. It does not include stagnation of air masses or meteorological inversions, a meteorological event involving high temperatures or lack of precipitation, or air pollution relating to source noncompliance.

EXCLUSION AREA: Areas determined unsuitable for a ROW because of (1) unique, highly valued, complex, or legally protected resources; (2) potentially significant environmental impact resulting from conflict with current land uses; or (3) areas posing substantial hazard to construction and/or operation of linear facility (e.g., electric transmission line, pipeline, telephone line, fiber optic line). In these areas, ROWs would be granted only in cases where there is a legal requirement to provide such access.

EXTENSIVE RECREATION MANAGEMENT AREA (ERMA): The ERMA is an administrative unit that requires specific management consideration in order to address recreation use, demand, or R&VS program investments.

FEDERAL LANDS: As used in this document, lands owned by the United States, without reference to how the lands were acquired or what federal agency administers the lands. The term includes mineral estates and coal estates underlying private surface but excludes lands held by the United States in trust for Indians, Aleuts, or Eskimos.

FEDERAL LAND POLICY AND MANAGEMENT ACT OF 1976 (FLPMA): Public law 94-579. An Act to establish public land policy; to establish guidelines for its administration; to provide for the management, protection, development, and enhancement of the public lands; and for other purposes.

FEDERAL LAND TRANSACTION FACILITATION ACT (FLTFA): FLTFA monies accrue from disposal of BLM lands by sale and the monies stay within the state where the disposal parcels are located. The BLM is entitled to 60% of the fund, while the Forest Service, Park Service and Fish and Wildlife Service are each entitled to 10%. The remaining 10% covers administrative costs. A proposal to use the fund for a specific acquisition must be presented to and agreed upon by all four agencies.

FEDERAL REGISTER: A daily publication that reports Presidential and federal agency documents. (BLM National Management Strategy for OHV Use on Public Lands)

FIRE FREQUENCY: How often a fire burns in a given area; often expressed in terms of fire return intervals. For example, a site might burn over every 5 to 15 years.

FIRE INTENSITY: Expression used to describe the power of wildland fires. More commonly described as the rate of energy released per unit length of the fire front.

FIRE MANAGEMENT PLAN: Strategic implementation-level plans that define a program to manage wildland fires, fuel reduction, and fire rehabilitation based on an area's approved RMP. Fire management plans must address a full range of fire management activities that support ecosystem sustainability, values to be protected, protection of firefighter and public safety, and public health and environmental issues and must be consistent with resource management objectives and activities of the area.

FIRE PREPAREDNESS: Activities that lead to a safe, efficient, and cost-effective fire management program in support of land and resource management objectives through appropriate planning and coordination.

FIRE REGIME/CONDITION CLASS: An interagency standardized tool for determining the degree of departure from reference condition vegetation, fuels, and disturbance regimes. Assessing FRCC can help guide management objectives and set priorities for treatments

FIRE SEVERITY: A qualitative measure of the fire's immediate effects on the ecosystem. Relates to the extent of mortality and survival of plant and animal life – both above and below ground and to loss of organic matter.

FIRE SUPPRESSION: All work activities connected with fire extinguishing operations, beginning with discovery of a fire and continuing until the fire is completely out.

FLUID MINERALS: Fluid minerals includes: Oil, gas, coal bed natural gas, and geothermal resources.

FLUVIAL: Pertaining to streams or produced by stream action.

FORAGE: Vegetation of all forms available and of a type used for animal consumption.

FOREST: An ecosystem characterized by a more or less dense and extensive tree cover, often consisting of stands varying in characteristics such as species composition, structure,

age class, and associated processes, and commonly including meadows, streams, fish, and wildlife.

FOREST ECONOMIC ANALYSIS SPREADSHEET TOOL (FEAST): A modeling tool used to assist in the development of economic impacts. The goal for FEAST model is to assist both economists and planning specialists in completing economic impact analyses.

FOREST HEALTH: The perceived condition of a forest derived from concerns about such factors as its age, structure, composition, function, vigor, presence of unusual levels of insects or disease, an resilience to disturbance.

FOREST HEALTH TREATMENTS: Treatments that restore forest ecosystems or stands to a condition that sustains complexity, function, and/or productivity while providing for human needs.

FOREST LAND: Land that is now, or has the potential of being, at least 10 percent stocked by forest trees (based on crown closure) or 16.7 percent stocked (based on tree stocking).

FOSSIL: Fossils are remains, traces, or imprints of organisms, preserved in or on the earth's crust, and include fossilized bones, impressions of parts of organisms, or tracks.

FRAGMENTATION: Fragmentation is the splitting or isolating of patches of similar habitat. Habitat can be fragmented by natural events or development activities.

FREE-FLOWING RIVER: "Free-flowing," as applied to any river or section of a river, means existing or flowing in a natural condition without impoundment, diversion, straightening, rip-rapping, or other modifications of the waterway. (Wild and Scenic Rivers Act)

FUEL LOADING: The weight of fuels in a given area, usually expressed in tons per acre, pounds per acre, or kilograms per square meter.

FUEL MANAGEMENT: Manipulation or reduction of fuels to meet forest protection and management objectives while preserving and enhancing environmental quality.

FUEL TREATMENT: The rearrangement or disposal of fuels to reduce the fire hazard.

FUEL TYPE: An identifiable association of fuel elements of a distinctive plant species, form, size, arrangement, or other characteristics that will cause a predictable rate of fire spread or difficulty of control under specified weather conditions.

FUNCTIONAL HABITAT: The combination of requirements (i.e. food, water, cover, and space), juxtaposed in a manner necessary to provide sustainable populations of fish and wildlife species. In addition, anthropogenic activities within this habitat must be such that fish or wildlife can subsist without reducing sustainability of the species. Habitat functionality would vary by wildlife species and by location.

FUNCTIONING AT RISK: (1) A condition in which vegetation and soil are susceptible to losing their ability to sustain naturally functioning biotic communities. Human activities, past or present, may increase the risks. (Rangeland Reform Final Environmental Impact Statement [FEIS] at 26.) (2) Uplands or riparian-wetland areas that are properly functioning, but a soil, water, or vegetation attribute makes them susceptible to degradation and lessens their ability to sustain natural biotic communities.

Uplands are particularly at risk if their soils are susceptible to degradation. Human activities, past or present, may increase the risks. (Rangeland Reform Draft Environmental Impact Statement [DEIS] Glossary). See also Properly Functioning Condition and Nonfunctioning Condition (H-4180-1, BLM Rangeland Health Standards Manual).

GEOCACHING: Geocaching is an outdoor adventure game for global position system (GPS) users. Participating in a cache hunt is an activity designed to take advantage of the features and capability of a GPS unit and enjoy the freedom of access to public land. GPS users use the location coordinates to find the caches. Once found, a cache may provide the visitor with a variety of awards. The visitor is asked to sign a logbook and to leave or replace items they find in the cache.

GEOGRAPHIC INFORMATION SYSTEM (GIS): A system of computer hardware, software, data, and applications that capture, store, edit, analyze, and display a wide array of geospatial information. (H-1601, BLM Land Use Planning Handbook)

GOAL: A broad statement of a desired outcome; usually not quantifiable and may not have established timeframes for achievement. . (H-1601, BLM Land Use Planning Handbook)

GRAZING LEASE: A document authorizing use of the public lands outside an established grazing district. Grazing leases specify all authorized use including livestock grazing, suspended use, and conservation use. Leases specify the total number of AUMs apportioned, the area authorize for grazing use, or both. (43CFR 4100.0-5)

GRAZING PERMIT: A document authorizing the use of the public lands within an established grazing district. Grazing permits specify all authorized use including livestock grazing, suspended use, and conservation use. Permits specify the total number of AUMs apportioned, the area authorized for grazing use, or both (43CFR 4100.0-5).

GRAZING PLAN: A concisely written program of livestock grazing management, including supportive measures, if required, designed to attain specific management goals in a grazing allotment. A grazing plan is prepared in consultation with the permittee(s), lessee(s), and the interested public. Livestock grazing is considered in relation to other uses of the range and to renewable resources, such as watershed, vegetation, and wildlife. A grazing plan establishes seasons of use, the number of livestock to be permitted, the range improvements needed, and the grazing system.

GRAZING PREFERENCE (or Preference): A superior or priority position against others for the purpose of receiving a grazing permit or lease. This priority is attached to base property owned or controlled by the permittee or lessee (43CFR 4100.0-5).

GUIDELINES: A practice, method, or technique determined to be appropriate to ensure that standards can be met or that significant progress can be made toward meeting the standard. Guidelines are tools such as grazing systems, vegetative treatments, or improvement projects that help managers and permittees achieve standards. Guidelines may be adapted or modified when monitoring or other information indicated the guideline is not effective, or a better means of achieving the applicable standard becomes appropriate. (H-4180-1, BLM Rangeland health Standards Manual)

HABITAT: An environment that meets a specific set of physical, biological, temporal, or spatial characteristics that satisfy the requirements of a plant or animal species or group of species for part or all of their life cycle. (M6840, Special Status Species Manual)

HABITAT TYPE: An aggregation of units of land capable of producing similar plant communities at climax.

HABITAT MANAGEMENT PLAN: .(HMP): a written and approved activity plan for a geographical area of public lands which identifies wildlife habitat management actions to be implemented in achieving specific objectives related to RMP planning document decisions. (BLM Manual 6780, 1981.)

HARVESTING: The felling, skidding, on-site processing, and loading of trees or logs onto trucks.

HERD AREA: The geographic area identified as having been used by a herd as its habitat in December 1971.

HERD MANAGEMENT AREA (HMA): Public land under the jurisdiction of the BLM that has been designated for special management emphasizing the maintenance of an established wild horse or burro herd. (H-4710-1)

HERD MANAGEMENT AREA PLAN (HMAP): An activity plan that focuses on and contains the necessary instructions for the management of wild horses on specified public lands to meet wild horse health, resource condition, sustained yield, multiple use, economic, and other objectives. The HMAP prescribes measures for the protection, management, and control of wild horses and burros and their habitat on one or more herd management areas, in conformance with decisions made in approved management framework or RMPs.

HISTORIC RANGE OF VARIABILITY (HVR): Characterizes fluctuations in ecosystem conditions or processes over time; thereby providing a reference against which to evaluate recent and potential future ecosystem change. Landres et al. (1999) defined natural variability as “the ecological conditions and their variability over space and time relatively unaffected by people.” The theory behind HRV is that the broad historical envelope of possible ecosystem conditions, such as burned area, vegetation cover type

area, or patch size distribution, provides a representative time series of reference conditions to guide land management (Aplet and Keeton 1999). For the RMP, the term “historical” is used to reference the time period prior to European settlement.

HISTORIC RESOURCES or HISTORIC PROPERTY: Any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register. The term includes, for purposes of these regulations, artifacts, records, and remains that are related to and located within such properties. The term “eligible for inclusion in the National Register” includes both properties formally determined as such by the Secretary of the Interior and all other properties that meet National Register listing criteria (quoted from 36 CFR 800.2(e); compare National Historic Preservation Act, Section 301, Appendix 5). (See also “cultural resource-cultural property.” “Cultural property” is an analogous BLM term not limited by National Register status.) (M-8100-1, BLM Cultural Resources Management) The term can also refer to cultural properties that have a period of use between Euro-American settlements to present.

HYDROLOGIC CONDITION: The current state of the processes controlling the yield, timing and quality of water in the watershed. Each physical and biologic process that regulates or influences stream flow and groundwater character has a range of variability associated with the rate or magnitude of energy and mass exchange. At any point in time, each of these processes can be defined by their current rate or magnitude relative to the range of variability associated with each process. Integration of all processes at one time represents hydrologic condition.

IMPLAN: The IMPLAN Model is an input-output impact model system which provides users with the ability to define industries, economic relationships and projects to be analyzed. This can be used to assess the economic impacts of resource management decisions, facilities, industries, or changes in their level of activity in a given area. The current IMPLAN input-output database and model is maintained and sold by MIG, Inc. (Minnesota IMPLAN Group).

IMPACTS (or EFFECTS): Environmental consequences (the scientific and analytical basis for comparison of alternatives) as a result of a proposed action. Effects may be either direct, which are caused by the action and occur at the same time and place, or indirect, which are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable, or cumulative. (BLM National Management Strategy for OHV Use on Public Lands)

IMPLEMENTATION DECISIONS: Decisions that take action to implement LUP decisions; generally appealable to the Interior Board of Land Appeals under 43 CFR 4.410. (H-1601-1, BLM Land Use Planning Handbook)

IMPLEMENTATION PLAN: An area or site-specific plan written to implement decisions made in a LUP. Implementation plans include both activity plans and project plans. (H-1601-1, BLM Land Use Planning Handbook)

IMPORTANT VALUE: As related to ACECs, a relevant value, resource, system, process, or hazard that has substantial significance and values. This generally requires qualities of more than local significance and special worth, consequence, meaning, distinctiveness, or cause for concern. A natural hazard can be important if it is a significant threat to human life or property. (43 CFR 1610.7-2(a) (2)).

INDIAN TRUST ASSETS: Lands, natural resources, money or other assets held by the federal government in trust for that are restricted against alienation for Indian tribes and individual Indians.

INDIAN TRUST RESOURCES: Lands and interests in lands, minerals, natural resources, or other physical assets held in trust by the federal government for beneficial owners and natural resources in which Indian tribes have federally protected or reserved interests (e.g. water, fish, wildlife, vegetation).

INDICATOR (species): Components of a system whose characteristics (presence or absence, quantity, distribution) are used as an index of an attribute (e.g., rangeland health attribute) that are too difficult, inconvenient, or expensive to measure. (Interagency Technical Reference 1734-8, 2000) (H-4180-1, BLM Rangeland Health Standards Manual)

INHOLDING: A nonfederal parcel of land that is completely surrounded by federal land.

INTEGRATED PEST MANAGEMENT (IPM): A long-standing, science-based, decision-making process that identifies and reduces risks from pests and pest management related strategies. It coordinates the use of pest biology, environmental information, and available technology to prevent unacceptable levels of pest damage by the most economical means, while posing the least possible risk to people, property, resources, and the environment. IPM provides an effective strategy for managing pest in all arenas from developed agricultural, residential, and public areas to wild lands. IPM serves as an umbrella to provide an effective, all encompassing, low-risk approach to protect resources and people from pests. BLM Departmental Manual 517 (Pesticides) defines integrated pest management as "a sustainable approach to managing pest by combining biological, cultural, physical, and chemical tools in a way that minimizes economic, health, and environmental risks.

INTEGRATED WEED MANAGEMENT (IWM): This is a decision support system involving deliberate selections, integration, and implementation of effective weed management tactics. It utilizes cost/benefit analysis and takes into consideration public interests and social, economical, and ecological impacts in the decision making process.

INTERDISCIPLINARY TEAM: Staff specialists representing identified skill and knowledge needs working together to resolve issues and provide recommendations to an authorized officer. (H-4180-1, BLM Rangeland Health Standards Manual)

INTERIM MANAGEMENT POLICY (IMP): An interim measure governing lands under wilderness review. This policy (H-8550-1) protects wilderness study areas from impairment of their suitability as wilderness.

INTERIOR BOARD OF LAND APPEALS (IBLA): The DOI Office of Hearings and Appeals Board acts for the Secretary of the Interior in responding to appeals of decisions on the use and disposition of public lands and resources. Because the IBLA acts for and on behalf of the Secretary of the Interior, its decisions usually represent the Department's final decision but are subject to the courts.

INTERMITTENT STREAM: A stream that flows only at certain times of the year when it receives water from springs or from some surface sources such as melting snow in mountainous areas. During the dry season and throughout minor drought periods, these streams will not exhibit flow. Geomorphological characteristics are not well defined and are often inconspicuous. In the absence of external limiting factors, such as pollution and thermal modifications, species are scarce and adapted to the wet and dry conditions of the fluctuating water level.

INVASIVE NON-NATIVE SPECIES (INNS): See invasive plants and species

INVASIVE PLANTS AND SPECIES: Plants and/or organisms that have been introduced into an environment where they did not evolve. Executive Order 13112 focuses on organism whose presence is likely to cause economic harm, environmental harm, or harms to human health.

INVASIVE WEEDS – NOXIOUS WEEDS: Non-native invasive plants that are fast spreading and often expensive or difficult to control. Noxious weeds may proliferate, forming mono-cultures, which can crowd out other plants that provide biodiversity.

JURISDICTION: The legal right to control or regulate use of a transportation facility. Jurisdiction requires authority, but not necessary ownership.

K FACTOR: A soil erodibility factor used in the universal soil loss equation that is a measure of the susceptibility of soil particles to detachment and transport by rainfall and runoff. Estimation of the factor takes several soil parameters into account, including soil texture, percent of sand greater than 0.10 millimeter, soil organic matter content, soil structure, soil permeability, clay mineralogy, and coarse fragments. K factor values range from .02 to .64, the greater values indicating the highest susceptibilities to erosion.

KARST TOPOGRAPHY: Karst is a landscape shaped by the dissolution of a layer or layers of soluble bedrock usually carbonate rock such as limestone or dolomite. Due to subterranean drainage, there may be very limited surface water, even to the absence of all rivers and lakes or perennial streams. Many karst regions display distinctive surface features, with sinkholes or dolines being the most common. Some karst regions include thousands of caves, even though evidence of caves that are big enough for human exploration is not a required characteristic of karst.

LAND CLASSIFICATION: A process for determining the suitability of public lands for certain types of disposal or lease under the public land laws or for retention under multiple use management.

LAND TENURE ADJUSTMENTS: Ownership or jurisdictional changes are referred as “Land Tenure Adjustments.” To improve the manageability of the BLM lands and their usefulness to the public, the BLM has numerous authorities for repositioning lands into a more consolidated pattern, disposing of lands, and entering into cooperative management agreements. These land pattern improvements are completed primarily through the use of land exchanges but also through exchange, sale, purchase, donation, or other authority, and through the use of cooperative management agreements and leases.

LAND TENURE ADJUSTMENT CATEGORY: The designation of an analyzed tract of land for retention or manner of disposal based upon resource values, or public access.

- **Category I:** Lands managed in Category I – Retention would include all ACECs, WSAs, Lands with Wilderness Characteristics, archeological sites/historic districts, and lands acquired through LWCF, National Historic Trails, National Monuments or other congressionally-designated areas. Lands within Category I would not be transferred from BLM management by any method for the life of the plan.
- **Category II:** Retention/Limited Land Ownership Adjustment (no land disposals through sale). Public lands within Category II would not be available for sale under section 203 of FLPMA. However, lands within this category could be exchanged for lands or interest in lands. Some public lands in Category II may contain resource values protected by law or policy. If actions cannot be taken to adequately mitigate impacts from disposal of those lands, those parcels would be retained.
- **Category III (Disposal – land ownership adjustments, including sale):** These lands generally have low or unknown resource values or are isolated or fragmented from other public land ownerships making them difficult to manage. Public land parcels in this category are relatively smaller in size (typically 160 acres or less). A listing of the legal descriptions of these disposal parcels can be found at the end of this Appendix (under Legal Descriptions of Disposal Tracts by Alternative). These parcels have been found to potentially meet the sale criteria of section 203(a)(1) of FLPMA and could be made available for sale, however, exchange could have priority over disposal by FLPMA sale.

LAND USE ALLOCATION: The identification in a land use plan of the activities and foreseeable development that are allowed, restricted, or excluded for all or part of the planning area, based on desired future conditions (from H-1601-1, BLM Land Use Planning Handbook).

LAND USE PLAN: A set of decisions that establish management direction for land within an administrative area, as prescribed under the planning provisions of FLPMA; an assimilation of land use plan level decisions developed through the planning process outlined in 43 CFR 1600, regardless of the scale at which the decisions were developed. The term includes both RMPs and management framework plans (MFPs). (H-1601-1, BLM Land Use Planning Handbook)

LAND USE PLAN BOUNDARY: The geographic extent of a resource management plan.

LAND USE PLAN DECISION: Establishes desired outcomes and actions needed to achieve them. Decisions are reached using the planning process in 43 CFR 1600. When they are presented to the public as proposed decisions, they can be protested to the BLM Director. They are not appealable to Interior Board of Land Appeals.

LANDS WITH WILDERNESS CHARACTERISTICS (LWC): Lands that have been inventoried under the provisions of BLM Manual Section 6300-1 and 6300-2 and found to contain wilderness characteristics as defined by section 2(c) of the Wilderness Act of 1964. If found to possess wilderness characteristics, these lands may be designated as “Wild Lands”.

LATE SEASON: Late summer or fall grazing.

LEASABLE MINERALS: Those minerals or materials designated as leasable under the Mineral Leasing Act of 1920. They include coal, phosphate, asphalt, sulphur, potassium and sodium minerals; and oil, gas, and geothermal.

LEASE: Section 302 of FLPMA provides the BLM’s authority to issue leases for the use, occupancy, and development of public lands. Leases are authorizations to possess and use public lands for fixed periods of time. Land uses which may be authorized by lease are those involving substantial construction, development, or land improvement and the investment of large amounts of capital which is to be amortized over time. A lease conveys a possessory interest and is revocable only in accordance with its terms and the provisions of 43 CFR 2920.1-1(a). There are no limitations on the amount of land that may be included in a lease, however the area should be limited to the size justified. Also see Permits.

LEASE STIPULATION (Oil & Gas): Conditions of lease issuance that provide protection for other resource values or land uses by establishing authority for substantial delay or site changes or the denial of operations within the terms of the lease contract. The authorized officer has the authority to relocate, control timing, and impose other mitigation measures under Section 6 of the Standard Lease Form. Lease stipulations clarify the Bureau’s intent to protect known resources or resource values.

LEK: An assembly area where birds, especially sage-grouse, carry on display and courtship behavior. Also referred to as a “strutting ground”. The following are the definitions of lek terminology when applied to trends and monitoring of leks from Montana Fish, Wildlife, and Parks:

- **Unconfirmed** - Single count with no subsequent survey or a reported lek without supporting survey data.
- **Confirmed Active** - Data supports existence of lek. Supporting data defined as: a) minimum of 2 years with 2 or more males lekking on site (preferred) or b) 1 year with 2 or more males lekking on site followed with evidence of lekking (vegetation trampling, feathers, and droppings) during subsequent year.

- **Confirmed Inactive** - 10 years with no males or sign of lek activity - supported by surveys conducted during 3 or more years over the last 10 years. Sage grouse abundance patterns have generally fit within a 10-year time frame, encompassing both years of abundance and relative scarcity. For the purpose of assigning lek status, 10 years with 3 years of supporting data is minimal for characterizing a lek as inactive. However, the capacity for surveying leks at a greater annual frequency in 10 years is generally limited and therefore this Status Definition incorporates both biological (i.e., past abundance patterns) and current administrative factors.
- **Confirmed Extirpated** - Habitat changes have caused birds to permanently abandon a lek (e.g., plowing, urban development, overhead power- line).

LIMITED AREAS: Designated areas where the use is subject to restrictions, such as limiting the number or types or vehicles allowed, dates and times of use (seasonal restrictions), limiting use to existing roads and trails, limiting use to designated roads and trails where use would be allowed only on roads and trails that are signed for use, or limited to administrative use. Combinations of restrictions are possible, such as limiting use to certain types of vehicles during certain times of the year (BLM National Management Strategy for OHV Use on Public Lands).

LU (Land Utilization) PROJECT LANDS (also referred to as Acquired Lands or Bankhead-Jones Lands): Formerly privately owned sub-marginal farmlands incapable of producing sufficient income to support the family of a farm owner and acquired by the United States, purchased under Title III of the Bankhead-Jones Farm Tenant Act of July 22, 1937. These acquired lands became known as land utilization projects and were subsequently transferred from jurisdiction of the USDA to the USDO. They are now administered by the BLM.

MECHANIZED TRAVEL: Moving by means of mechanical devices, such as a bicycle; not powered by a motor.

MINE: An opening or excavation in the earth for extracting minerals.

MINERAL: Any naturally formed inorganic material, solid or fluid inorganic substance that can be extracted from the earth, any of various naturally occurring homogeneous substances (as stone, coal, salt, sulfur, sand, petroleum, water, or natural gas) obtained usually from the ground. Under federal laws, considered as locatable (subject to the general mining laws), leasable (subject to the Mineral Leasing Act of 1920), and salable (subject to the Materials Act of 1947).

- **Leaseable Minerals:** Those minerals or materials designated as leasable under the Mineral Leasing Act of 1920, as amended. Leaseable minerals include such solid leaseables as coal, phosphate, asphalt, sulphur, potassium, sodium minerals and such fluid leaseables as oil and gas.
 - **Non-Energy Leasable Minerals:** These solid minerals include phosphate, sodium, potassium, sulphur, potash, and gilsonite. Most of

these non-energy leasables are used to make fertilizer, feed stock (mineral supplement for livestock) or other industrial processes. See 43 CFR 3500 for more information on non-energy leasable minerals.

- **Locatable Minerals:** Minerals subject to exploration, development, and disposal by staking mining claims as authorized by the Mining Law of 1872, as amended. This includes deposits of gold, silver, and other uncommon minerals not subject to lease or sale.
- **Saleable Minerals or Mineral Materials:** Common materials such as sand and gravel and common varieties of stone, pumice, pumicite, and clay that are not obtainable under the mining or leasing laws but that can be acquired under the Materials Act of 1947, as amended, through sales or special permits.

MINERAL ENTRY: The filing of a claim on public land to obtain the right to any locatable minerals it may contain.

MINERAL ESTATE: The ownership of minerals, including rights necessary for access, exploration, development, mining, ore dressing, and transportation operations.

MINIMIZATION MITIGATION: Minimizing impacts by limiting the degree or magnitude of the action and its implementation. (40 CFR 1508.20(b))

MINIMIZE: To reduce the adverse impact of an operation to the lowest practical level.

MINING CLAIM: A parcel of land that a miner takes and holds for mining purposes, having acquired the right of possession by complying with the Mining Law and local laws and rules. A mining claim may contain as many adjoining locations as the locator may make or buy. There are four categories of mining claims: lode, placer, millsite, and tunnel site.

MITIGATION: A measure that will result in a physical change to the proposed action that will actually reduce or eliminate impacts. CEQ NEPA regulations identify five types of measures to deal with significant environmental effects: (1) avoiding the impact altogether by not taking a certain action or parts of an action; (2) minimizing an impact by limiting the degree or magnitude of the action and its implementation; (3) rectifying the impact by repairing, rehabilitating, or restoring the affected environment; (4) reducing or eliminating the impact over time by preservation and maintenance; or (5) compensating for the impact by replacing or providing substitute resources or environments.

MONITORING: Observations, data collection, and studies that evaluate compliance of on-the-ground management with the RMP direction, or the effectiveness of RMP-prescribed management direction, in meeting broader goals objectives. Monitoring evaluates whether actions (1) comply with NEPA decisions that have been implemented; (2) achieve the desired objectives (e.g. effectiveness); and (3) are based on accurate assumptions (e.g., validation).

MOTORIZED: Any machine activated by a nonliving power source, except that small battery-powered, hand-carried devices such as flashlights, shavers, and Geiger counters are not classed as motorized equipment. (examples: ATV/OHV, motorcycles, cars, trucks, etc.)

MULTIPLE USE: The management of the public lands and their various resource values so that they are used in the combination that will best meet the present and future needs of the American people; making the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use to changing needs and conditions; the use of some land for less than all of the resources; a combination of balanced and diverse resource uses that takes into account the long-term needs of future generations for renewable and nonrenewable resources, including recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific and historical values; and harmonious and coordinated management of the various resources without permanent impairment of the productivity of the land and the quality of the environment with consideration being given to the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output (FLPMA) (BLM Manual 6840, Special Status Species Manual).

NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) of 1969: An Act which encourages productive and enjoyable harmony between man and his environment; promotes efforts to prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of man; enriches the understanding of the ecological systems and natural resources important to the Nation; and establishes a CEQ (BLM National Management Strategy for OHV Use on Public Lands)

NATIONAL REGISTER: The National Register of Historic Places, expanded and maintained by the Secretary of Interior, as authorized by Section 2(b) of the Historic Sites act and Section 101(a)(1)(A) of the National Historic Preservation Act. The National Register lists cultural properties found to qualify for inclusion because of their local, state, or national significance. Eligibility criteria and nomination procedures are found in 36 CFR Part 60. The Secretary's administrative responsibility for the National Register is delegated to the National Park Service. (M-8100-1, BLM Cultural Resource Management)

NATIONAL WILD AND SCENIC RIVERS SYSTEM: A system of nationally designated rivers and their immediate environments that have outstanding scenic, recreational, geologic, fish and wildlife, historic, cultural, and other similar values and are preserved in a free-flowing condition. The system consists of three types of streams: (1) recreational—rivers or sections of rivers that are readily accessible by road or railroad and that may have some development along their shorelines and may have undergone some impoundments or diversion in the past; (2) scenic—rivers or sections of rivers free of impoundments with shorelines or watersheds still largely undeveloped but accessible in places by roads; and (3) wild—rivers or sections of rivers free of impoundments and generally inaccessible except by trails, with watersheds or shorelines essentially primitive and waters unpolluted.

NATIVE AMERICAN TRIBE: Any Native American group in the coterminous United States that the Secretary of the Interior recognizes as possessing tribal status (listed periodically in the Federal Register). (H-1601, BLM Land Use Planning Handbook)

NATURALNESS: Lands and resources affected primarily by the forces of nature where the imprint of human activity is substantially unnoticeable in an area of 5,000 acres or greater. BLM has authority to inventory, assess, and/or monitor the attributes of the lands and resources on public lands, which, taken together, are an indication of an area's naturalness. These attributes may include the presence or absence of roads and trails, fence and other improvements; the nature and extent of landscape modifications; the presence of native vegetation communities; and the connectivity of habitats (from IM-20030275, change 1, Considerations of Wilderness Characteristics in LUP, Attachment 1).

NEOTROPICAL MIGRATORY BIRDS: Birds that winter in Central America, South America, the Caribbean, and Mexico and then return to the United States and Canada during spring to breed. Includes almost half of the bird species that breed in the United States and Canada.

NET CONSERVATION GAIN: The actual benefit or gain above baseline conditions.

NONFUNCTIONING CONDITION: (1) Condition in which vegetation and ground cover are not maintaining soil conditions that can sustain natural biotic communities. (2) Riparian-wetland areas are considered to be in nonfunctioning condition when they do not provide adequate vegetation, landform, or large woody debris to dissipate stream energy associated with high flows and thus are not reducing erosion, improving water quality, or other normal characteristics of riparian areas. The absence of a floodplain may be an indicator of nonfunctioning condition. (H-4180-1, BLM Rangeland Health Standards Manual)

NO SURFACE OCCUPANCY: A fluid mineral leasing constraint that prohibits occupancy or disturbance on all or part of the lease surface to protect special values or uses. Lessees may exploit the fluid mineral resources under the leases restricted by this constraint through use of directional drilling from sites outside the area. Leasing with "no surface occupancy" means that there will be no development or disturbance whatsoever of the land surface, including establishment of wells or well pads, and construction of roads, pipelines, or power lines.

NOXIOUS WEED: A plant species designated by federal or state law and county weed boards, are non-native species that generally possess one or more of the following characteristics: aggressive and difficult to manage; parasitic; aggressive and difficult to manage; parasitic; a carrier or host of serious insects or disease; or non-native, new, or not common to the United States.

OBJECTIVE: A description of a desired outcome for a resource. Objectives can be quantified and measured and, where possible, have established timeframes for achievement.

OFF-HIGHWAY VEHICLE or OFF-ROAD VEHICLE: Off-road vehicle (OHV) means any motorized vehicle designed for or capable of cross-country travel on or immediately over land, water, sand, snow, ice, marsh, swampland, or other natural terrain; except that such term excludes: (1) any registered motorboat, (2) any fire, emergency, or law enforcement vehicle when used for emergency operations, and any combat or combat support vehicle when used for national defense purposes, and (3) any vehicle whose uses is expressly authorized by the respective agency head under a permit, lease, license, or contract (E.O. 11644).

OFF-ROAD VEHICLE DESIGNATIONS:

- **Open:** Designated areas and trails where off-road vehicles may be operated, subject to operating regulations and vehicle standards set forth in BLM Manuals 8341 and 8343; or an area where all types of vehicle use is permitted at all times, subject to the standards in BLM Manuals 8341 and 8343.
- **Limited:** Designated areas and trails where use of off-road vehicles is subject to restrictions, such as limiting the number or types of vehicles allowed, dates and times of use (seasonal restrictions), limiting use to existing roads and trails, or limiting use to designated roads and trails designation, use would be allowed only on roads and trails that are signed for use. Combinations of restrictions are possible, such as limiting use to certain types of vehicles during certain times of the year.
- **Closed:** Designated areas and trails where the use of off-road vehicles is permanently or temporarily prohibited. The use of off-road vehicles in closed area may be allowed for certain reasons; however, such use shall be made only with the approval of the authorized officer.

OFFICIAL USE: Use by an employee, agent, or designated representative of the Federal Government or one of its contractors, in the course of his employment, agency, or representation. (BLM National Management Strategy for OHV Use on Public Lands)

OLD FOREST STRUCTURE: Physical forest or woodland characteristics that contribute to the structure, composition, or function of forested stands for a particular forest type. These characteristics include large and old tree components, accumulation of dead wood components such as standing snags and/or downed logs, occurrence of climax plant species or seral trees with a common decadent attributes such as broken or deformed tops and rotten boles, wide variation in tree age classes and stocking levels, and multiple canopy layers.

OLD GROWTH: Forested stands in late successional stages of development meeting the main characteristics or old forest structures that are described by the forest type for the East-side Montana Zone in Old-Growth Forest Types of the Northern Region (Green, 1992).

OPEN AREA: An area where all types of vehicle use is permitted at all times, anywhere in the area subject to the operating regulations and vehicle standards set forth in 43 CFR 8341 and 8342.

OPERATOR: An operator is one who has authorization from the BLM to conduct activity on public land.

OUTSTANDINGLY REMARKABLE VALUES: Values among those listed in Section 1(b) of the WSR Act of 1968: “scenic, recreational, geological, fish and wildlife, historical, cultural, or other similar values....” Other similar values that may be considered include ecological, biological, or botanical.

OVER-SNOW VEHICLE: An over-snow vehicle (OSV) is defined as a motor vehicle that is designed for use over snow that runs on a track or tracks and/or skis, while in use over snow. An over-snow vehicle does not include machinery used strictly for the grooming on non-motorized trails.

OVERSTOCKED: The situation in which trees are so closely spaced that they compete for resources and do not reach full growth potential.

OVERSTORY: That portion of the trees, in a forest of more than one story, forming the upper or uppermost canopy layer.

OZONE: Ozone is created and destroyed primarily by ultraviolet radiation.. When high-energy ultraviolet rays strike molecules of ordinary oxygen (O₂), they split the molecule into two single oxygen atoms, known as atomic oxygen (O). A freed oxygen atom then can combine with an oxygen molecule to form a molecule of ozone (O₃). In atmospheres containing nitrogen oxides (NO_x, a common pollutant) and volatile organic compounds (VOCs), ozone can be created in the presence of sunlight. Although ozone is critical in the high atmosphere to protect against ultraviolet (UV) light, low level ozone is implicated in impacts as diverse as crop damage and increased incidence of asthma and other respiratory complaints.

PALEONTOLOGICAL RESOURCES: Paleontological resource means any fossilized remains, traces, or imprints of organisms, preserved in or on the earth’s crust, that are of paleontological interest and that provide information about the history of life on earth, except that the term does not include (a) any materials associated with an archaeological resource (as defined in Section 3(1) of the Archaeological Resources Protection Act of 1979 (16 U.S.C. 470bb(1)); or (b) any cultural item (as defined in Section 2 of the Native American Graves Protection and Repatriation Act (24 U.S.C. 3001 et seq.)).

PERENNIAL STREAM: A stream that flows continuously. Perennial streams are generally associated with a water table in the localities through which they flow.

PERMIT: A short-term, for up to 3 years, revocable authorization to use public lands for specific purposes. Section 302 of FLPMA provides BLM’s authority to issue permits for the use, occupancy, and development of the public lands. Permit land uses involve either little or no land improvement or construction, or investment which can be amortized within the terms of the permit. A permit conveys no possessory interest. The authorized officer may renew it at his/her discretion or revoke it in accordance with its terms or the provisions of 43 CFR 2920.1-1(b). Also see Leases.

PERMITTEE: Holder of a valid permit that authorizes grazing use of the public lands within the grazing district, Also a holder of a Special Recreation Permit (SRP) for commercial, competitive, organized or vending activities for recreational uses being conducted on public lands. Also a holder of a commercial filming permit issued by the BLM for filming activities conducted on public lands.

PERMITTED USE: The forage allocated by, or under the guidance of, an applicable land use plan for livestock grazing in an allotment under a permit or lease and expressed in AUMs (43 CFR § 4100.0-5) (from H-4180-1, BLM Rangeland Health Standards Manual).

PETROGLYPH: A figure, design, or indentation carved, abraded, or pecked on natural rock surfaces.

PICTOGRAPH: A figure or design, colored with charcoal or natural mineral pigments, painted onto a rock.

PLANNING AREA: A geographical area for which land use and resource management plans are developed and maintained.

PLANNING CRITERIA: The standards, rules, and other factors developed by managers and interdisciplinary teams for their use in forming judgment about decision making, analysis and data collection during planning; planning criteria streamline and simplify the resource management planning actions. (H-1601, BLM Land Use Planning Handbook)

PLAT: Map of land parcels. The BLM Master Title Plat system records the size, location and ownership status of distinct parcels. The information is derived from warranty deeds and is updated as needed.

PLAY (oil & gas): Defined as a set of known or postulated oil and/or gas accumulations sharing similar geologic, geographic and temporal properties such as source rock, migration pathway, trapping mechanism, and hydrocarbon type.

POLE: A tree of a size between a sapling and a mature tree.

POPULATION: Within a species, a distinct group of individuals that tend to mate only with members of the group. Because of generations of inbreeding, members of a population tend to have similar genetic characteristics.

POTENTIAL FOSSIL YIELD CLASSIFICATION (PFYC): A system of general classification based upon the lithology of surface rocks that estimates the likelihood of a given rock unit to yield vertebrate or other scientifically important fossil materials.

POTENTIAL TO EMIT (PTE): The maximum capacity of a facility or emitting unit, within physical and operational design, to emit a pollutant. Any physical or operational limitation on the capacity of the facility or emitting unit to emit a pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or

amount of material combusted, stored, or processed, is treated as part of its design only if the limitation or the effect it would have on emissions is federally enforceable.

POWER SITE CLASSIFICATION: A classification made by the Federal Power Commission that is a segregate against the operation of the public laws for lands that are needed or have potential for power projects and associated transmission lines. Lands classified to benefit transmission lines are open to the operation of the public land laws subject to their use for transmission lines.

POWER SITE RESERVE: A reservation of public lands that have potential value for power development.

PRAIRIE DOG HABITAT: The maximum extent of areas occupied by prairie dogs at any time during the last 10 years.

PREFERENCE: A superior or priority position against others for the purpose of receiving a grazing permit or lease. This priority is attached to base property owned or controlled by the permittee or lessee. (43 CFR 4100.0-5) Active use and suspended use together make up permitted use.

PREHISTORIC: Refers to the period when wherein Native American cultural activities took place which was not yet influenced by contact with historic nonnative culture(s). The end of this time period varies by region.

PRESCRIBED FIRE: Any fire ignited by management action to meet specific objectives. A written approved fire plan must exist, and NEPA requirements must be met, prior to ignition. (H-9214-1, BLM Prescribed Fire Management Handbook)

PREVENTION OF SIGNIFICANT DETERIORATION (PSD): A regulatory program under the Clean Air Act (Public Law 84-159, as amended) to limit air quality and AQRV degradation in areas currently achieving the National Ambient Air Quality Standards. The PSD program established air quality classes in which differing amounts of additional air pollution are allowed above a legally defined baseline level. Small additional air pollution may be considered significant in PSD Class I areas (certain large national parks and wilderness areas in existence on August 7, 1977, and specific Tribal lands redesignated since then). PSD Class II areas allow deterioration associated with moderate, well-controlled growth (most of the country). Area classes are described below.

- **Class I:** an area that allows only minimal degradation above “baseline.” The Clean Air Act designated existing national parks over 6,000 acres and national wilderness areas over 5,000 acres in existence on August 7, 1977, as mandatory federal Class I Areas. These areas also have special visibility protection. In addition, four tribal governments have redesignated their lands as Class I Areas.
- **Class II:** an area that allows moderate degradation above “baseline.” Most of the United States (outside nonattainment areas) is Class II.

- Class III: any area that allows the maximum amount of degradation above “baseline.” Although the U.S. Congress allows air quality regulatory agencies to redesignate Class II lands to Class III, none have been designated.

PREVENTION OF SIGNIFICANT DETERIORION (PSD) INCREMENT AND

INCREMENT ANALYSIS: The allowable PSD increment is the change in pollutant concentration allowed in a Class I, Class II, or Class III area. PSD increment values are provided in EPA regulations. As performed by the BLM for NEPA analysis, PSD increment analysis is a method of comparing predicted (modeled) pollutant concentrations to EPA’s allowable PSD increment values for the purpose of public disclosure only. The BLM increment analysis is not a regulatory analysis. State air quality agencies and the USEPA perform regulatory PSD increment analysis.

PRIMITIVE AND UNCONFINED RECREATION (in regards to designated Wilderness

Areas): Means non-motorized types of outdoor recreation activities that do not require developed facilities or mechanical transport. Mechanical transport means any vehicle, device, or contrivance for moving people or material in or over land, water, snow, or air that has moving parts. This includes, but is not limited to, sailboats, sailboards, hang gliders, parachutes, bicycles, game carriers, carts, and wagons. The term does not include wheelchairs, nor does it include horses or other pack stock, skis, snowshoes, non-motorized river craft including, but not limited to, drift boats, rafts, and canoes, or sleds, travois, or similar devices without moving parts. (43 CFR 6301.5 Definitions.) There are no designated Wilderness Areas in the Billings Field Office Planning area. For lands under Wilderness Review, i.e. Wilderness Study Areas, “No mechanical transport, which includes all motorized vehicles plus trail or mountain bikes, will be allowed on such trails.” (H-8550-1, Chapter III, § H1)

PRIMITIVE RECREATION: As defined in the Recreation Opportunity Spectrum (ROS), primitive recreation is managed to be essentially free from evidence of humans and onsite controls. Motor vehicle use is not permitted. Means of access include hiking, cross-country skiing, snowshoeing, non-motorized boating, and horseback riding.

PRIMITIVE ROAD: A linear route managed for use by four-wheel drive or high clearance vehicles. Primitive roads do not normally meet any BLM road design standards.

PRIMITIVE ROUTE: Any transportation linear feature located within areas that have been identified as having wilderness characteristics and not meeting the wilderness inventory road definition.

PROBABLE SALE QUANTITY (PSQ): The allowable harvest level that can be maintained without decline over the long term if the schedule of harvests and regeneration are followed. PSQ recognizes a level of uncertainty in meeting the determined level; this uncertainty is typically based on other environmental factors that preclude harvesting at a particular time (for example, because of watershed or habitat concerns). A PSQ is not a commitment to offer for sale a specific level of timber volume every year.

PROPERLY FUNCTIONING CONDITION (PFC): (1) An element of the Fundamental of Rangeland Health for watersheds and therefore a required element of state or regional standard and guidelines under 43 CFR § 4180.2(b). (2) Condition in which vegetation and ground cover maintain soil conditions that can sustain natural biotic communities. For riparian areas, the process of determining that function is described in BLM Technical Reference (TR) 1737-9. Final Environmental Impact Statement at 26, 72. (3) Riparian-wetland areas are functioning properly when adequate vegetation, landform, or large woody debris are present to dissipate stream energy associated with high-water flows, thereby reducing erosion and improving water quality; filter sediment, capture bed load, and aid floodplain development; improve floodwater retention and groundwater recharge; develop root masses that stabilize streambanks against cutting action; develop diverse ponding and channel characteristics to provide the habitat and the water depth, duration, and temperature necessary for fish production, waterfowl breeding, and other uses; and support greater biodiversity. The functioning condition of riparian-wetland areas is influenced by geomorphic features, soil, water, and vegetation. (4) Uplands function properly when the existing vegetation and ground cover maintain soil conditions capable of sustaining natural biotic communities. The functioning condition of uplands is influenced by geomorphic features, soil, water, and vegetation. See also “Nonfunctioning Condition and Functioning at Risk” (H-4180-1, BLM Rangeland Health Standards Manual).

PROPER FUNCTIONING CONDITION FOR LENTIC AREAS: A riparian-wetland areas are functioning properly when adequate vegetation, landform, or debris is present to: dissipate energies associated with wind action, wave action, and overland flow from adjacent sites, thereby reducing erosion and improving water quality; filter sediment and aid floodplain development; improve flood-water retention and ground-water recharge; develop root masses that stabilize islands and shoreline features against cutting action; restrict water percolation; develop diverse ponding characteristics to provide the habitat and the water depth, duration, and temperature necessary for fish production, waterbird breeding, and other uses; and support greater biodiversity.

PROPER FUNCTIONING CONDITION FOR LOTIC AREAS: A riparian-wetland area is considered to be in proper functioning condition when adequate vegetation, landform, or large woody debris is present to:

- Dissipate stream energy associated with high waterflow, thereby reducing erosion and improving water quality;
- Filter sediment, capture bedload, and aid floodplain development;
- Improve flood-water retention and ground-water recharge;
- Develop root masses that stabilize streambanks against cutting action;
- Develop diverse ponding and channel characteristics to provide the habitat and the water depth, duration, and temperature necessary for fish production, waterfowl breeding, and other uses;
- Support greater biodiversity.

PROPOSED SPECIES: Species that have been officially proposed for listing as threatened or endangered by the Secretary of the Interior. A proposed rule has been published in the Federal Register. (M-6840, Special Status Species Manual)

PRYOR MOUNTAIN WILD HORSE RANGE (PMWHR): The combination of agency (BLM, USFS, and NPS) and private rangelands authorized for use by wild horses. Not to be confused with WILD HORSE RANGE (see definition below) which is a special designation of which only the BLM portion of the PMWHR has this status.

PUBLIC LAND: Any land and interest in land owned by the United States and administered by the Secretary of the Interior through the Bureau of Land Management, without regard to how the United States acquired ownership, except lands located on the Outer Continental Shelf and land held for the benefit of Indians, Aleuts, and Eskimos. (from H-1601-1, BLM Land Use Planning Handbook and BLM Public Land Statistics).

PULPWOOD: Roundwood, whole-tree chips, or wood residues that are used for the production of wood pulp.

RANGE IMPROVEMENT: An authorized physical modification or treatment which is designed to improve production of forage; change vegetation composition; control patterns of use; provide water; stabilize soil and water conditions; restore, protect and improve the condition of rangeland ecosystems to benefit livestock, wild horses and burros, and fish and wildlife. The term includes, but is not limited to, structures, treatment projects, and use of mechanical devices or modifications achieved through mechanical means. (43CFR 4100.0-5) (H-4180-1, BLM Rangeland Health Standards Manual)

RANGELAND: A kind of land on which the native vegetation, climax or natural potential consists predominantly of grasses, grasslike plants, forbs, or shrubs. Rangeland includes lands revegetated naturally or artificially to provide a noncrop plant cover that is managed like native vegetation. Rangeland may consist of natural grasslands, savannahs, shrublands, most deserts, tundra, alpine communities, coastal marshes, and wet meadows. (H-4180-1, BLM Rangeland Health Standards Manual)

RAPTOR: A group of predatory avian species (e.g., hawks, eagles, falcons, and owls) also referred to as birds of prey, which share various physical characteristics (e.g., sharp talons, strongly curved bill).

REASONABLE FORESEEABLE DEVELOPMENT (RFD) SCENARIO: The prediction of the type and amount of oil and gas activity that would occur in a given area. The prediction is based on geologic factors, past history of drilling, projected demand for oil and gas, and industry interest.

RECLAMATION: Actions taken to restore damaged lands to Proper Functioning Condition including removal of structures, replacement or regrading of topsoil, tilling of compacted soils to allow infiltration of air and water, installation of erosion control structures, seeding or planting of native vegetation and integrated pest management to control invasive species.

RECORD OF DECISION (ROD): A document signed by a responsible official recording a decision that was preceded by the preparing of an EIS.

RECREATION EXPERIENCE: Psychological outcomes realized either by recreation-tourism participants as a direct result of their on-site leisure engagements and recreation-tourism activity participation or by nonparticipating community residents as a result of their interaction with visitors and guests within their community or interaction with the BLM and other public and private recreation-tourism providers and their actions.

RECREATION AND PUBLIC PURPOSES (R&PP) ACT of 1926: The objective of the R&PP Act is to meet the needs of state and local government agencies and nonprofit organizations by leasing or conveying public land required for recreation and public purpose uses.

RECREATION MANAGEMENT ZONES: The recreation management zones are delineated for specific recreation opportunities, predominate recreation and visitor services focus, and recreation setting characteristics for long term management.

RECREATION NICHE: The place or position within the strategically targeted recreation-tourism market for each SRMA that is most suitable (i.e., capable of producing certain specific kinds of recreation opportunities) and appropriate (i.e., most responsive to identified visitor or resident customers), given available supply and current demand, for the production of specific recreation opportunities and the sustainable maintenance of accompanying natural resource or community setting character.

RECREATION SETTING CHARACTERISTICS MATRIX: More than ½ mile from either mechanized or motorized routes; undisturbed natural landscape; no structures, foot/horse and water trails only; fewer than three (3) encounters/day at campsites and fewer than six (6) encounters/day on travel routes; fewer than or equal to three (3) people per group; no alternation of the natural terrain; footprints only observed; and sounds of people rare.

RECREATION OPPORTUNITIES: Favorable circumstances enabling visitors' engagement in a leisure activity to realize immediate psychological experiences and attain more lasting, value-added beneficial outcomes.

RECREATION OPPORTUNITY SPECTRUM (ROS): A framework for inventorying, planning, and managing recreational opportunities. ROS is divided into six classes: primitive, semi-primitive non-motorized, semi-primitive motorized, roaded natural, rural, and urban. This system has been replaced by the Recreation Setting Characteristics Matrix.

RECREATIONAL RIVER: Those rivers or sections of rivers that are readily accessible by road or railroad, that may have some development along their shorelines, and that may have undergone some impoundment or diversion in the past.

RECREATION SETTINGS: The collective distinguishing attributes of landscapes that influence and sometimes actually determine what kinds of recreation opportunities are produced.

RECREATION SETTING CHARACTER: The distinguishing recreational qualities of any landscape, objectively defined along a continuum, ranging from primitive to urban landscapes, expressed in terms of the nature of the component parts of its physical, social, and administrative attributes. These recreational qualities can be both classified and mapped. This classification and mapping process should be based on variation that either exists (for example, setting descriptions) or is desired (for example, setting prescriptions) among component parts of the various physical, social, and administrative attributes of any landscape. The recreation opportunity spectrum is one of the tools for doing this. Below is a text version of the recreation setting character matrix:

- Primitive Classification:
 - ▶ Physical:
 - More than ½ mile from either mechanized or motorized routes.
 - Undisturbed natural landscape.
 - No structures. Foot/horse and water trails only.
 - ▶ Social:
 - Fewer than three encounters/day at camp sites and fewer than 6 encounters/day on travel routes.
 - Fewer than or equal to three people per group.
 - No alteration of the natural terrain. Footprints only observed. Sounds of people rare.
 - ▶ Operational:
 - Foot, horse, and non-motorized float boat travel.
 - No maps or brochures available on-site. Staff is rarely present to provide on-site assistance.
 - No on-site posting/signing of visitor regulations, interpretive information or ethics. Few use restrictions
- Back Country Classification
 - ▶ Physical:
 - Within ½ mile of four-wheel drive vehicle, ATV and motorcycles routes.
 - Character of the natural landscape retained. A few modifications contrast with character of the landscape (e.g. fences, primitive roads).
 - Maintained and marked trails, simple trailhead developments and basic toilets.
 - ▶ Social:
 - 3-6 encounters/day off travel routes (e.g., campsites) and 7-15 encounters/day on travel routes
 - 4-6 people per group.

- Areas of alteration uncommon. Little surface vegetation wear observed. Sounds of people infrequent.
- ▶ Operational:
 - Mountain bikes and perhaps other mechanized use, but all is non-motorized.
 - Basic maps, staff infrequently present (e.g. seasonally, high use periods) to provide on-site assistance.
 - Basic user regulations at key access points. Minimum use restrictions.
- Middle Country Classification:
 - ▶ Physical:
 - Within ½ mile of four-wheel drive vehicle, ATV and motorcycles routes.
 - Character of the natural landscape retained. A few modifications contrast with character of the landscape (e.g. fences, primitive roads).
 - Maintained and marked trails, simple trailhead developments and basic toilets.
 - ▶ Social:
 - 7-14 encounters/day off travel routes (e.g., staging areas) and 15-29 encounters/ day on travel routes
 - 7-12 people per group.
 - Small areas of alteration. Surface vegetation showing wear with some bare soils. Sounds of people occasionally heard.
 - ▶ Operational
 - Four-wheel drives, all-terrain vehicles, dirt bikes, or snowmobiles in addition to non-motorized, mechanized use.
 - Area brochures and maps, staff is occasionally (e.g. most weekends) present to provide on-site assistance.
 - Some regulatory and ethics signing. Moderate use restrictions. (e.g. camping, human waste).
- Front Country Classification
 - ▶ Physical:
 - Within ½ mile of low-clearance or passenger vehicle routes (includes unpaved County roads and private land routes).
 - Character of the natural landscape partially modified but none overpower natural landscape (e.g. roads, structures, utilities).
 - Rustic facilities such as campsites, restrooms, trailheads, and interpretive displays.
 - ▶ Social:
 - 15-29 encounters/day off travel routes (e.g., campgrounds) and 30 or more encounters/day on travel routes.
 - 13-25 people per group.

- Small areas of alteration prevalent. Surface vegetation gone with compacted soils observed. Sounds of people regularly heard
- ▶ Operational:
 - Two-wheel drive vehicles predominant, but also four wheel drives and non-motorized, mechanized use.
 - Information materials describe recreation areas & activities, staff periodically present (e.g. weekdays & weekends).
 - Rules, regulations, and ethics clearly posted. Use restrictions, limitations, and/or closures.
- Rural Classification
 - ▶ Physical:
 - Within ½ mile of paved/primary roads and highways.
 - Character of the natural landscape considerably modified (agriculture, residential or industrial).
 - Modern facilities such as campgrounds, group shelters, boat launches, and occasional exhibits.
 - ▶ Social:
 - People seem to be generally everywhere.
 - 26-50 people per group.
 - A few large areas of alteration. Surface vegetation absent with hardened soils. Sounds of people frequently heard.
 - ▶ Operational:
 - Ordinary highway auto and truck traffic is characteristic.
 - Information described to the left, plus experience and benefit descriptions, staff regularly present (e.g. almost daily).
 - Regulations strict and ethics prominent. Use may be limited by permit, reservation, etc.
- Urban Classification
 - ▶ Physical:
 - Within ½ mile of streets and roads within municipalities and along highways.
 - Urbanized developments dominate landscape.
 - Elaborate full-service facilities such as laundry, restaurants, and groceries.
 - ▶ Social:
 - Busy place with other people constantly in view.
 - Greater than 50 people per group.
 - Large areas of alteration prevalent. Some erosion. Constantly hear people.
 - ▶ Operational:
 - Wide variety of street vehicles and highway traffic is ever-present.

- Information described to the left, plus regularly scheduled on-site outdoor demonstrations and clinics.
- Enforcement in addition to rules to reduce conflicts, hazards, and resource damage.

REGENERATION: The act of renewing tree cover by establishing young trees naturally or artificially.

REIS: Regional Economic Information System (REIS). This is an information system used by the Bureau of Economic Analysis, U.S. Department of Commerce.

RELEVANT VALUE: As related to ACECs, a relevant value is a significant historic, cultural, or scenic value; a fish or wildlife resource or other natural system or process; or natural hazard. (43 CFR 1610.7-2(a)(1))

RELICT PLANT COMMUNITY: A remnant or fragment of vegetation remaining from a former period when the vegetation was more widely distributed.

RE-PLAT: When tracts of land are changed by avulsion or accretion of land due to changes in river channels it may be necessary to re-survey and map the altered landscape to reflect current conditions. Lots previously described may be removed from the Master Title Plat and new lots platted in their place.

REQUIRED DESIGN FEATURE (RFD): Required Design Features (RDFs) are required for certain activities in all GRSG habitat. RDFs establish the minimum specifications for certain activities to help mitigate adverse impacts. However, the applicability and overall effectiveness of each RDF cannot be fully assessed until the project level when the project location and design are known. Because of site-specific circumstances, some RDFs may not apply to some projects (e.g., a resource is not present on a given site) and/or may require slight variations (e.g., a larger or smaller protective area). All variations in RDFs would require that at least one of the following be demonstrated in the NEPA analysis associated with the project/activity:

- A specific RDF is documented to not be applicable to the site-specific conditions of the project/activity (e.g. due to site limitations or engineering considerations). Economic considerations, such as increased costs, do not necessarily require that an RDF be varied or rendered inapplicable;
- An alternative RDF is determined to provide equal or better protection for GRSG or its habitat;
- A specific RDF will provide no additional protection to GRSG or its habitat.

RESERVE ALLOTMENTS: A separate BLM administered grazing unit (allotment or pasture), that is reserved for nonrenewable grazing use by permittees/lessees or others participating in land restoration or recovery efforts that preclude use of all or part of the permitted use assigned to their base property.

RESERVE COMMON ALLOTMENT: An area which is designated in the land use plan as available for livestock grazing, but reserved as an area available for use as an alternative to grazing in another allotment in order to facilitate rangeland restoration treatments and

recovery from natural disturbances such as drought or wildfire. The reserve common allotment would provide needed flexibility that would help the agency apply temporary rest from grazing where vegetation treatments and/or management would be most effective.

RESIDUAL IMPACTS: Impacts that remain after applying avoidance and minimization mitigation; also referred to as unavoidable impacts.

RESILIENCE: The capacity of a plant community or ecosystem to maintain or regain normal function and development following disturbance.

RESOURCE ADVISORY COUNCIL (RAC): A council established by the Secretary of the Interior to provide advice or recommendations to BLM management (H-1601-1, BLM Land Use Planning Handbook)

RESOURCE MANAGEMENT PLAN (RMP): A land use plan as described by the Federal Land Policy and Management Act. The RMP generally establishes in a written document: (1) land uses for limited, restricted or exclusive use; designations, including ACEC designation; and transfer from BLM administration; (2) allowable resource uses (either singly or in a combination) and related levels of production or use to be maintained; (3) resource condition goals and objectives to be attained; (4) program constraints and general management practices needed to achieve the above items; (5) need for an area to be covered by more detailed and specific plans; (6) support action, including such measures as resource protection, access, development, realty action, cadastral survey, etc., as necessary to meet the above; (7) general implementation sequences in which carrying out a planned action; and (8) intervals and standards for monitoring and evaluating the plan to determine the effectiveness of the plan and the need for amendment or revision. (43 CFR 1601.0-5(k))

REST ROTATION: A grazing system, or plan that rests (and defers) use in specific pasture(s) in an allotment on an annual basis. The number of years between rest for a pasture depends on the number pastures in the allotment.

REVISION: The process of completely rewriting the land use plan due to changes in the planning area affecting major portions of the plan or the entire plan.

RIGHT-OF-WAY (ROW): Public lands authorized to be used or occupied for specific purposes pursuant to a right-of-way grant, which are in the public interest and which require ROWs over, on, under, or through such lands. A 44LD513 ROW is a ROW that BLM issues to itself.

- Major Rights-of-Way: High-voltage transmission lines (100kV and over) and major pipelines (24 inches and over in width)
- Minor Rights-of-Way and Land Use Authorizations/Permits: Communication sites and towers

RIGHT-OF-WAY CORRIDOR: A parcel of land that has been identified by law, Secretarial order, through a LUP or by other management decision as being the preferred location

for existing and future ROW grants and suitable to accommodate one type of ROW or one or more ROWs that are similar, identical or compatible. The purpose of establishing ROW corridors is to encourage the concentration of utilities in a defined area to reduce the proliferation of multiple single-user rights of way, and to reduce the extent of environmental impact analysis for each separate right-of-way proposal.

RIPARIAN AREA: A form of wetland transition between permanently saturated wetlands and upland areas. Riparian areas exhibit vegetation or physical characteristics that reflect the influence of permanent surface or subsurface water. Typical riparian areas include lands along, adjacent to, or contiguous with perennially and intermittently flowing rivers and streams, glacial potholes, and the shores of lakes and reservoirs with stable water levels. Excluded are ephemeral streams or washes that lack vegetation and depend on free water in the soil.

RIVER: As defined in the Wild and Scenic Rivers Act, “river” means a flowing body of water or estuary or section, portion, or tributary thereof, including rivers, streams, creeks, runs, kills, rills, and small lakes.

ROAD: A linear route declared a road by the owner, managed for use by low clearance vehicles having four or more wheels, and maintained for regular and continuous use.

- Closed
- Limited
- Open
- Permanent Road

ROADED NATURAL: As defined in the Recreation Opportunity Spectrum, roaded natural recreation is managed to provide a natural-appearing environment with moderate evidence of humans. Motor vehicle use is permitted and facilities for this use are provided. Activities include wood gathering, downhill skiing, fishing, OHV driving, interpretive uses, picnicking, and vehicle camping.

ROCK ART: A generic term used to describe both petroglyphs (carvings) and/or pictographs (paintings).

ROTATION: Livestock rotations from one pasture to the next (in an allotment) at specified times of the year.

ROUTES: Multiple roads, trails and primitive roads; a group or set of roads, trails, and primitive roads that represents less than 100 percent of the BLM transportation system. Generically, components of the transportation system are described as “routes.”

RURAL: As defined in the Recreation Opportunity Spectrum, rural recreation is managed to provide a setting that is substantially modified with moderate to high evidence of civilization. Motor vehicle use is permitted and visitor conveniences may be provided. Activities are facility/vehicle dependent and include sightseeing, horseback riding, road biking, golf, swimming, picnicking, and outdoor games.

SAGE-GROUSE HABITAT – GENERAL HABITAT AREAS: Areas with or without on-going or imminent impacts containing sage-grouse habitat outside of the priority areas. Management actions would maintain habitat for sustainable sage-grouse populations to promote movement and genetic diversity. Areas are delineated based on sage-grouse habitat.

SAGE-GROUSE HABITAT – PROTECTION PRIORITY AREAS: Areas with limited impacts containing substantial and high quality sage-grouse habitat that support sustainable sage-grouse populations. Management actions would emphasize the protection and enhancement of sustainable sage-grouse populations. Areas are delineated by using “key”, “core” and connectivity data/maps and other resource information.

SAGE-GROUSE HABITAT – RESTORATION AREAS: Areas with on-going or imminent impacts containing substantial and high quality sage-grouse habitat that historically supported sustainable sage-grouse populations. Management actions would emphasize restoration for the purpose of establishing or restoring sustainable sage-grouse populations. Areas are delineated by using “key,” “core,” and connectivity data/maps and other resource information.

SAPLING: A young tree larger than a seedling, but smaller than a pole.

SCENIC BYWAYS: Highway routes that have roadsides or corridors of special aesthetic, cultural, or historical value. An essential part of the highway is its scenic corridor. The corridor may contain outstanding scenic vistas, unusual geologic features, or other natural elements.

SCENIC QUALITY RATINGS: The relative scenic quality (A, B, or C) assigned a landscape by applying the scenic quality evaluation key factors; scenic quality A being the highest rating, B a moderate rating, and C the lowest rating. The evaluation factors are landform, vegetation, water, color, adjacent scenery, scarcity, and cultural modifications. (M-8400, Visual Resource Management)

SCENIC RIVER: A river or section of a river that is free of impoundments and whose shorelines are largely undeveloped but accessible in places by roads.

SCOPING: An early and open process for determining the scope of issues to be addressed and or identifying the significant issues related to a proposed action. This effort involves the participation of affected federal, state, and local agencies, and any affected Native American tribe, the proponent of the action, and other interested persons, unless there is a limited expectation under 40 CFR 1507.3I.

SEASON OF USE: The period of time during which livestock grazing is permitted on a given allotment, as specified in the mandatory terms and conditions of the grazing lease or permit.

SECTION 7 CONSULTATION: A part or section of the Endangered Species Act (ESA), called “Interagency Cooperation”, is the mechanism by which Federal agencies ensure the

actions they take, including those they fund or authorize, do not jeopardize the existence of any listed species.

SECTION 106 COMPLIANCE: The requirement of Section 106 of the National Historic Preservation Act that any project that the Federal Government funds, licenses, permits, or assists be reviewed for impacts on significant historic properties and that the State Historic Preservation Officer and the Advisory Council on Historic Preservation be allowed to comment on a project.

SEEDLING: A young plant or tree grown from a seed.

SEMI-PRIMITIVE MOTORIZED: As defined in the Recreation Opportunity Spectrum, semi-primitive motorized recreation is managed to provide a natural-appearing environment with evidence of humans and management controls present, but subtle. Means of access include motorized vehicles and mountain bicycles.

SEMI-PRIMITIVE NON-MOTORIZED: As defined in the Recreation Opportunity Spectrum, semi-primitive non-motorized recreation is managed to be largely free from evidence of humans and onsite controls. Motor vehicle use is not permitted (except as authorized). Facilities for the administration of livestock and for visitor use are allowed but limited. Means of access include hiking, cross-country skiing, snow shoeing, non-motorized boating, and horseback riding.

SENSITIVE CLASS II AREA: A Class II area under the Prevention of Significant Deterioration (PSD) Program for which a federal land management (FLM) agency, state agency, or tribal authority requests Air Quality Related Value (AQRV) analysis comparable to that performed for PSD Class I areas. Agencies with jurisdiction over sensitive Class II areas sometimes request that the lead agency implement mitigation measures to protect AQRVs at sensitive Class II areas. Sensitive Class II areas are not addressed by the Clean Air Act.

SENSITIVE SPECIES: Species that require special management consideration to avoid potential future listing under the ESA and that have been identified in accordance with procedures set forth in this manual (6840 Manual) Those species designated by a State Director, usually in cooperation with the state agency responsible for managing the species and State Natural heritage programs, as sensitive. They are those species that (1) could become endangered in or extirpated from a state, or within a significant portion of its distribution; (2) are under status review by the FWS and/or NMFS; (3) are undergoing significant current or predicted downward trends in habitat capability that would reduce a species' existing distribution; (4) are undergoing significant current or predicted downward trends in population or density such that federal listed, proposed, candidate, or state-listed status may become necessary; (5) typically have small and widely dispersed populations; (6) inhabit ecological refugia or other specialized or unique habitats; or (7) are state listed but that may be better conserved through application of BLM-sensitive species status (M6840, Special Status Species Manual).

SERAL (state or stage): One of three successional states based on the current composition of the vegetative community. States include early, mid and late seral states culminating in a climax community. Transition from one state to the next can be natural or induced. Induced transition is typically disturbance induced and can be progressive or retrogressive. Natural succession from one stage to the next is typically progressive, culminating in the climax community. “Climax community” is often used synonymously with terms such as Potential Natural Community (PNC) and Potential Natural Vegetation (PNV) and is the highest potential vegetative community that the site will support.

SETTING CHARACTER: See Recreation Setting Character.

SIGNIFICANT: An effect that is analyzed in the context of the proposed action to determine the degree or magnitude of importance of the effect, whether beneficial or adverse. The degree of significance can be related to other actions with individually insignificant but cumulatively significant impacts.

SIGNIFICANT PALEONTOLOGICAL RESOURCE (syn. Significant Fossil Resource): Any paleontological resource that is considered to be of scientific interest, including most vertebrate fossil remains and certain rare or unusual invertebrate and plant fossils. A significant paleontological resource may be considered to be scientifically important because it is a rare or previously unknown species, it is of high quality and well-preserved, it preserves a previously unknown anatomical or other characteristic, or provides new information about the history of life on earth. Paleontological resources that may be considered to not have paleontological significance include those that lack provenience or context, lack physical integrity because of decay or natural erosion, or that are overly redundant or are otherwise not useful for research.

SILVICULTURE: The art and science of controlling the establishment, growth, composition, health, and quality of forests and woodlands to meet the diverse needs and values of landowners and society on a sustainable basis.

SITE: The combination of biotic, climatic, topographic, and soil conditions of an area.

SITE PREPARATION: Hand or mechanized manipulation of a site, designed to enhance the success of regeneration.

SOCIOECONOMIC STUDY AREA: The geographic area used for estimation and analysis of economic and social impacts.

SOLITUDE: Visitors may have outstanding opportunities for solitude, or primitive and unconfined types of recreation when the sights, sounds, and evidence of other people are rare or infrequent, where visitors can be isolated, alone, or secluded from others, where the use of the area is through non-motorized, non-mechanical means, and where no or minimal developed recreation facilities are encountered in an area of 5,000 acres or greater (from IM-2003-275, Change 1, Considerations of Wilderness Characteristics in LUP, Attachment 1).

SPECIAL RECREATION MANAGEMENT AREA (SRMA): The SRMA is an administrative unit where the existing or proposed recreation opportunities and recreation setting characteristics are recognized for their unique value, importance, or distinctiveness; especially compared to other areas used for recreation.

SPECIAL RECREATION PERMIT (SRP): Is an authorization which allow specified and often time-restricted recreational uses of the public lands and related waters. Permits are administered under the BLM Handbook H -2930 and policy is specifically provided for in the Federal Lands Recreation Enhancement Act (REA), P.L. 108-47. They are used as a means to manage visitor use, protect natural and cultural resources, as a means to achieve the goals and objectives of the Field Office recreation program as outlined in a land use plan, and as a mechanism to authorize the types of described as follows:

- Commercial use
- Competitive
- Vending
- Special area use
- Organized Use
- Commercial Filming Permits in conjunction with an SRP.

SPECIAL STATUS SPECIES: Collectively, federally listed or proposed and Bureau sensitive species (BLM State Director designated sensitive species), which include both Federal candidate species and delisted species within 5 years of delisting. (BLM Manual 6840, Special Status Species Management). (H-1601-1, BLM Land Use Planning Handbook)

SPLIT ESTATE: Surface land and mineral estate of a given area under different ownerships. Frequently, the surface will be privately owned and the minerals federally owned.

SPLIT SEASON: Removing livestock from the allotment and returning them later in the year within the permitted time.

SPOT TREATMENT: An application of an herbicide to a small selected area as opposed to broadcast application.

SPRAGUE'S PIPIT HABITAT: Moderately suitable and optimal habitat classes from the NTNHP Maxent Inductive Model of Sprague's pipit breeding habitat.

STANDARD: A description of the physical and biological conditions or degree of function required for healthy, sustainable lands (e.g., Land Health Standards). To be expressed as a desired outcome (goal). (H-1601-1, BLM Land Use Planning Handbook)

STANDARDS FOR RANGELAND HEALTH: Descriptions of the desired condition of the biological and physical components and characteristics of rangeland. The four standards deal with upland soils, riparian and wetland areas, desired species, and water quality.

STAND DENSITY: A quantitative measure of stocking expressed either absolutely in terms of number of trees, basal area or volume per unit area or relative to some standard condition.

STATE IMPLEMENTATION PLAN: A detailed description of the programs a state will use to carry out its responsibilities under the Clean Air Act.

STATE LISTED SPECIES: Species listed by a state in a category implying but not limited to potential endangerment or extinction. Listing is either by legislation or regulation. (M-6840, Special Status Species Manual)

STIPULATIONSs: Requirements that are part of the terms of various types of leases. Some stipulations are standard on all federal leases. Other stipulations may be applied to the lease at the discretion of the surface management agency to protect valuable surface resources and uses.

SUITABLE RIVER: A river segment found, through administrative study by an appropriate agency, to meet the criteria for designation as a component of the National Wild and Scenic Rivers system, specified in Section 4(a) of the Wild and Scenic Rivers Act.

SUPPRESSED: A tree condition characterized by low growth rate and low vigor as a result of competition.

SUPPRESSION: Actions taken to extinguish or reduce the intensity or extent of wildland fires, including the construction of fuel breaks by manual or mechanical means, ground or aerial application of water or water/chemical mixtures, ignition of backfires or burning out of fuels increase the size of fuel breaks.

SUSTAINED SLOPE: A slope, measured the length of an incline, where short variances within the slope do not affect the overall grade.

SURFACE DISTURBING ACTIVITIES or SURFACE DISTURBANCE: The physical disturbance or removal of land surface and vegetation. Some examples of surface-disturbing activities include, but are not limited to, construction of roads, well pads, pipelines, powerlines, reservoirs, facilities, recreation sites, and mining. Vegetation renovation treatments that involve soil penetration and/or substantial mechanical damage to plants (plowing, chiseling, chopping, etc.) are also surface-disturbing activities.

SURFACE OCCUPANCY: Placement or construction of the land surface (temporary or permanent) for more than 14 days requiring continual service or maintenance. Casual use is excluded.

SUSTAINABILITY: Long-term management of ecosystems to meet the needs of present human populations without interruption, weakening, or loss of the resource base for future generations. (EPA)

SUSTAINED YIELD: The achievement and maintenance in perpetuity of a high-level annual or regular periodic output of the various renewable resources of the public lands consistent with multiple use.

TAKE: For the purposes of the endangered species act, the term “take” means to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect or to attempt to engage in any such conduct (Endangered Species Act of 1973).

TECHNICAL/ECONOMICALLY FEASIBLE: Actions that are practical or feasible from the technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant. It is the BLM’s sole responsibility to determine what actions are technically and economically feasible. The BLM will consider whether implementation of the proposed action is likely given past and current practice and technology; this consideration does not necessarily require a cost-benefit analysis or speculation about an applicant’s costs and profit.” (Modified from the CEQ’s 40 Most Asked Questions and BLM NEPA Handbook, Section 6.6.3)

TEMPORARY DISRUPTIVE ACTIVITIES: Activities that involve human presence or activities to be in crucial habitats for less than one hour during a 24-hour period in a site specific area. (MT-IM-2010-017, 11-30-09, “Guidance of Greater Sage Grouse Management and Conservation in RMP’s in Management Zones 1 & 2 within Montana / Dakotas BLM”, Attachment 3, Definitions)

TERRITORY: The USFS geographic area identified as having been used by a herd as its habitat in 1971 at the passage of the Wild Free-Roaming Horse and Burro Act (PL 92-195) as amended.

THINNING: A cultural treatment made to reduce stand density of trees primarily to improve growth, enhance forest health, or recover potential mortality.

THREATENED SPECIES: Any species that is likely to become endangered within the foreseeable future throughout all or a significant portion of its range (BLM Manual 6840, Special Status Species Management).

TIMELINESS: The lack of time lag between impacts and the achievement of compensatory mitigation goals and objectives (BLM Manual Section 1794).

TIMING LIMITATION (seasonal restriction): A restriction on permitted activities which allows certain activities during specific periods to avoid the disturbance of plant or animal species during critical periods of the life cycle including, mating, parturition, or periods of environmental stress caused by limited food supplies or extreme temperatures.

TOTAL MAXIMUM DAILY LOAD (TMDL): An estimate of the total quantity of pollutants (from all sources: point, nonpoint, and natural) that may be allowed into waters without exceeding applicable water quality criteria.

TRADITIONAL CULTURAL PROPERTY: A property that derives significance from traditional values associated with it by a social or cultural group, such as an Indian tribe or local community. A traditional cultural property may qualify for the National Register of Historic Places if it meets the criteria and criteria exceptions at 36 CFR 60.4. See National Register Bulletin 38.

TRAIL: A linear route managed for human-powered, stock, or some off-highway forms of transportation or for historical or heritage values. Trails are not generally managed for use by four-wheel drive or high clearance vehicles.

TRANSPORTATION LINEAR FEATURES: “Linear features” represents the broadest category of physical disturbance (planned and unplanned) on BLM land. Transportation related linear features include engineered roads and trails, as well as user-defined, non-engineered roads and trails created as a result of the public use of BLM land. Linear features may include roads and trails identified for closure or removal as well as those that make up the BLM’s defined transportation system.

TRANSPORTATION SYSTEM: The sum of the BLM’s recognized inventory of linear features (roads, primitive roads, and trails) formally recognized, designated, and approved as part of the BLM’s transportation system.

TRAVEL MANAGEMENT AREAS: Polygons or delineated areas where a rational approach has been taken to classify areas open, closed or limited, and have identified and/or designated a network of roads, trails, ways, and other routes that provide for public access and travel across the planning area. All designated travel routes within travel management areas should have a clearly identified need and purpose as well as clearly defined activity types, modes of travel, and seasons or timeframes for allowable access or other limitations (MS-1626).

Travel Management Areas - definitions of terminology used on Travel Management Area maps and in Chapter 2 Travel Management Area Alternatives comparison

- Open to all Vehicles (O): Route is open to all uses without any stipulations or restrictions
- Open with Additional Management (MO): Route is open to all uses with some forms of additional management, such as adaptive management monitoring or specific mitigations, monitoring, or maintenance.
- Open with Restrictions – Seasonal (ML or L) – Pryors: Route is open to all uses with seasonal restrictions. There may be some forms of additional management such as adaptive management monitoring or specific mitigation, monitoring, or maintenance.
- Open with Restrictions – Conditional (ML or L) – Shepherd: Route is open to all uses except during periods of high soil moisture/high erosion potential, during which time route will be closed to all motorized uses. There may be some forms of additional management such as adaptive management monitoring or specific mitigation, monitoring, or maintenance.
- Open to Technical 4WD by Permit Only (Alt C) – (Open with Restrictions – Vehicle Type (ML or L)) – Horsethief: Open to modified 4wd vehicles with special event permit only. There may be some forms of additional management such as adaptive management monitoring or specific mitigation, monitoring, or maintenance.
- Open to Motorcycles Only (Open with Restrictions – Vehicle Type (ML or L)): Route is open to Motorcycles. There may be some forms of additional

management such as adaptive management monitoring or specific mitigation, monitoring, or maintenance.

- Open to Vehicles 50” or Less (Open with Restriction – Vehicle Type (ML or L)): Route is open to vehicles 50" wide or less. There may be some forms of additional management such as adaptive management monitoring or specific mitigation, monitoring, or maintenance.
- Administrative Use Only (L or ML): Route limited to administrative or authorized use only. There may be some forms of additional management such as adaptive management monitoring or specific mitigation, monitoring, or maintenance.
- Closed to All Vehicles (C): Route is closed to all uses, including non-motorized uses, in that a trail or route would not be officially recognized or maintained.
- Non-motorized Use Only: Route is limited to non-motorized use only (closed to all motorized uses). There may be some forms of additional management such as adaptive management monitoring or specific mitigation, monitoring, or maintenance.

TRIBAL TRUST RESOURCES: Those natural resources, either on or off Indian lands, retained by, or reserved by or for Indian tribes, through treaties, statutes, judicial decisions, and executive orders, which are protected by a fiduciary obligation on the part of the United States.

UNALLOTTED LANDS: Public lands available for grazing that currently have no livestock grazing authorized.

UNDERTAKING: A project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a federal agency, including those carried out by or on behalf of a federal agency; those carried out with federal financial assistance; those requiring a federal permit, license, or approval; and those subject to state or local regulation administered pursuant to a delegation or approval by a federal agency.

UNSUITABILITY CRITERIA: Criteria of the federal coal management program by which lands may be assessed as unsuitable for all or certain stipulated methods of coal mining. (43 CFR 4300)

URBAN: As defined in the Recreation Opportunity Spectrum, urban recreation is managed to provide a setting that is largely modified. Large numbers of users can be expected, and vegetation cover is often exotic and manicured. Facilities for highly intensified motor vehicle use and parking are available, with mass transit often included to carry people throughout the site.

USER DAY: Any calendar day, or portion thereof, for each individual accompanied or serviced by an operator or permittee on the public lands or related waters; synonymous with passenger day or participant day.

UTILITY: A service that a public utility provides (e.g., electricity, telephone or water).

UTILITY CORRIDOR: A parcel of land, linear or aerial in character, that has been identified by law, Secretarial Order, the land-use planning process, or by other management decisions, as being a preferred location for existing and future ROW grants and suitable to accommodate more than one type of ROW or one or more ROW that are similar, identical, or compatible.

VALID EXISTING RIGHTS: Legal “rights” or interest that are associated with land or mineral estate and that cannot be divested from the estate until that interest expires, is relinquished, or acquired. Various laws, leases, and filings under federal law establish valid existing rights.

VEGETATION TYPE: A plant community with distinguishable characteristics described by the dominant vegetation present.

VISIBILITY (air quality): A measure of the ability to see and identify objects at different distances.

VISITOR USE: Visitor use of a resource for inspiration, stimulation, solitude, relaxation, education, pleasure, or satisfaction.

VISUAL RESOURCE MANAGEMENT (VRM): A system by which BLM inventories and manages scenic values and visual quality of public lands. The system is based on research that has produced ways of accessing aesthetic qualities of the landscape in objective terms. In RMPs, lands are assigned management classes, which determine the amount of modification allowed for the basic elements of the landscape.

VISUAL RESOURCE MANGEMENT CLASSES: A process to define the degree of acceptable visual change within a characteristic landscape. Visual Resources are inventoried using procedures established in the BLM Handbook H-8410-1 and are managed under the guidelines in BLM Handbook H-8431. A class is based on the physical and sociological characteristics of any given homogeneous area and serves as a management objective. Categories assigned to public lands are based on scenic quality, sensitivity level, and distance zones. Each class has an objective that prescribes the amount of change allowed in the characteristic landscape (from H-1601-1, BLM Land Use Planning Handbook). The four classes are described below:

- Class I provides for natural ecological changes with very little management activity. This class includes primitive areas, some natural areas, some wild and scenic rivers, and other similar areas where landscape modification activities should be restricted.
- Class II areas are those areas where changes in any of the basic elements (form, line, color, or texture) caused by management activity should not be evident in the characteristic landscape. The goal is to retain the existing landscape character.
- Class III includes areas where changes in the basic elements (form, line, color, or texture) caused by a management activity may be evident in the characteristic

landscape. The level of change from an activity should not dominate the landscape, but may attract attention of the casual observer. Changes should repeat the basic landscape elements.

- Class IV applies to areas where changes may subordinate the original composition and character; however, they should reflect what could be a natural occurrence within the characteristic landscape, if possible. The level of change to the existing landscape can be high and may dominate the view. This class provides for management activities which require modification to the existing landscape character. .

WAIVER: Permanent exemption from a lease stipulation. The stipulation no longer applies anywhere within the leasehold.

WATER QUALITY: The chemical, physical, and biological characteristics of water with respect to its suitability for a particular use.

WAY: A vehicle route within a WSA that was in existence and inventoried during the FLPMA Section 603-mandated wilderness inventory. Interim Management Policy for Lands under Wilderness Review (H-8550-1) defines a way as “a track maintained solely by the passage of vehicles, which has not been improved and/or maintained by mechanical means to ensure relatively regular and continuous use.” The term is also used during wilderness inventory to identify routes that are not roads. The term is developed from the definition of the term “roadless” provided in the Wilderness Inventory Handbook (September 27, 1978), as follows: “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.” A trace maintained solely by the passage of vehicles which has not been improved and /or maintained by mechanical means to ensure relatively regular and continuous use. (Interim Management Policy for lands under Wilderness review- IMP, H -8550-1).

WETLANDS: Areas that are inundated or saturated by surface or ground water often and long enough to support, and under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions.

WILD AND SCENIC RIVER: Rivers identified in Section 5 of the Wild and Scenic Rivers Act of 1968 for study as potential additions to the National Wild and Scenic Rivers System. The rivers will be studied under the provisions of Section 4 of the act (from M-8351, BLM WSR Policy and Program).

WILDERNESS: A congressionally designated area of undeveloped federal land retaining its primeval character and influence, without permanent improvements or human habitation, that is protected and managed to preserve its natural conditions and that (1) generally appears to have been affected mainly by the forces of nature, with human imprints substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least 5,000 acres or is large enough to make practical its preservation and use in an unimpaired condition; and (4)

may also contain ecological, geological, or other features of scientific, educational, scenic, or historic value. The definition is contained in Section 2(c) of the Wilderness Act of 1964 (78 Stat. 891) (from H-6310-1, Wilderness Inventory and Study Procedures). These lands are included in the National Wilderness Preservation System.

WILDERNESS CHARACTERISTICS: Wilderness characteristics include size, the appearance of naturalness, outstanding opportunities for solitude, or a primitive and unconfined type of recreation. They may also include ecological, geological, or other features of scientific, educational, scenic, or historical value. A complete definition is contained in Section 2 (c) of the Wilderness Act of 1964 (78 Stat 891)

WILDERNESS STUDY AREAS (WSAs): Areas designated as having wilderness characteristics as described in Section 2 (c) of the Wilderness Act (78 Stat. 891), made through the inventory and study process authorized by Section 603 or Section 202 of FLPMA. Areas designated as WSAs must be managed as being under wilderness review until Congress either designates these lands as wilderness or releases them for other purposes. They are not managed as if they are already designated Wilderness, but as not to impair their suitability for potential designation by Congress. If the lands are released from wilderness review, they are managed under the general BLM management policies and applicable land use plans.

WILDFIRE: An unplanned ignition of a wildland fire (such as a fire caused by lightning, volcanoes, unauthorized and accidental human caused fires) and escaped prescribed fires. (2009 Guidance for Implementation of Federal Wildland Fire Management Policy)

WILD HORSE RANGE: An area of land designated from a herd management area to be managed principally, but not exclusively, for wild horse or burro herds.

WILD HORSES AND BURROS: Unbranded and unclaimed horses and burros that use the public lands as all or part of their habitat or that have been removed from these lands by the authorized officer but have not lost their status under Section 3 of the Act (H-4750-2, BLM Wild Horse and Burro Adoption Handbook)

WILD LANDS: A designation resulting from a plan decision to protect lands with wilderness characteristics (LWC) located outside of the Wilderness Study Areas (WSAs) and Wilderness Areas. Wild land protection measures are developed in the course of plan development BLM is required under Section 201 of FLPMA to conduct and maintain a current inventory of natural resources. BLM conducts its wilderness characteristics inventory through the BLM Manual 6301 and incorporates the findings in the RMP through its Manual 6302. These manuals implement Secretarial Order 3310 and incorporates principles from BLM guidance (ex: Organic Act directives) and legal rules developed as part of BLM's original wilderness inventories.

WILDLAND FIRE: Any non-structure fire that occurs in vegetation or natural fuels. Wildland fire includes prescribed fire and wildfire. (2014 NWCG glossary)

WILDLAND URBAN INTERFACE (WUI): The line, area, or zone in which structures and other human development meet or intermingle with undeveloped wildland or vegetative fuels.

WILD RIVER: Those rivers or sections of rivers that are free of impoundments and generally inaccessible except by trail, with watersheds or shorelines essentially primitive and unpolluted. These represent vestiges of primitive America.

WILD, SCENIC, OR RECREATIONAL: The term used for what is traditionally shortened to wild and scenic rivers. Designated river segments are classified as wild, scenic, or recreational but cannot overlap (from M-8351, BLM WSR Policy and Program).

WINTER RANGE: Range that is grazed by livestock or wildlife during the winter.

WITHDRAWAL: An action that restricts the use of public lands by removing them from the operation of some or all of the public land laws (e.g. mineral rights).

WOODLAND: A community of trees that are often small, characteristically short-boled relative to their crown depth and forming only an open canopy with the intervening area being occupied by a lower vegetation type.