

CHAPTER 5

Consultation and Coordination



INTRODUCTION

The Big Dry Resource Management Plan and Environmental Impact Statement was prepared by an interdisciplinary team of specialists from the Big Dry and Powder River resource areas, the Miles City District Office and the Montana State Office of the BLM. Reviews for adequacy and consistency were provided by the district and state office staffs.

Consultation, coordination, and public involvement have occurred throughout the process through scoping meetings, informal meetings, individual contacts, newspaper releases, and *Federal Register* notices.

Preparation of the document began in the fall of 1989. Data used was from inventories before that time, from information received from the public and other agencies, and knowledge of the resource area specialists.

PUBLIC PARTICIPATION

A public participation plan was prepared to provide management and team guidance for developing the resource management plan and environmental impact statement and to insure public involvement during the entire resource management plan and environmental impact statement preparation process. During scoping of the plan, formal and informal public input was encouraged and sought after.

Federal Register notices were published on October 3, 1989, and May 3, 1990, informing the public of the notice of intent to plan, calling for coal information and areas of critical and environmental concern identification, and announcing the notice of availability for the planning criteria.

Several news releases were published in local papers. The releases announced the beginning of the plan, encouraged public involvement and the availability of planning criteria.

Brochures were mailed to more than 1,000 individuals, groups, and agencies in December 1989 notifying the public of the expected issues and upcoming public scoping meetings. Brochures also were mailed in April 1990 summarizing the comments received from the public scoping meetings.

Public scoping meetings were conducted at 9 towns in the planning area with a total attendance of 214 people. Individual meetings were held with commissioners in 10 counties; the Assiniboine, Sioux, and Northern Cheyenne Native American tribes; and 2 special interest groups.

A total of 64 written responses were received after the public scoping meetings. Most of these written comments were a reiteration of the oral comments received at the public meetings. Oral and written comments covered the entire spectrum of issues, but the majority were concerned with resource management in the lands, range, recreation, and wildlife programs. One special interest group commented on the coal program, but this was the only specific comment received on mineral activities. Records of public comments and concerns are on file in the Big Dry Resource Area office.

As part of the analysis process, a telephone interview was conducted with 100 people representing the full range of resource interests in the planning area. The results of these interviews and all other public involvement were used during selection of the preferred alternative (Trent 1991).

In February 1993, approximately 1,500 copies of the draft resource management plan and environmental impact statement were distributed for public comment at a cost of \$25,000. A *Federal Register* notice was published March 19, 1993, beginning the comment period on the draft resource management plan and environmental impact statement. The comment period on the draft resource management plan and environmental impact statement closed June 18, 1993. A *Federal Register* notice asking for comments on two newly proposed areas of critical environmental concern was published on November 26, 1993, with the comment period ending January 25, 1994.

Public meetings were held to gather comments on the draft resource management plan and environmental impact statement at nine locations.

PLACE	DATE	ATTENDANCE
Wolf Point	May 3, 1993	0
Sidney	May 4, 1993	6
Jordan	May 5, 1993	46
Circle	May 6, 1993	16
Glendive	May 10, 1993	16
Terry	May 11, 1993	19
Baker	May 12, 1993	22
Forsyth	May 13, 1993	1
Miles City	May 17, 1993	3
Total		129

Consultation with the U.S. Fish and Wildlife Service on Threatened and Endangered Species

As required by Section 7 of the Endangered Species Act of 1973, on July 14, 1994, the BLM submitted a biological assessment to the U.S. Fish and Wildlife Service. This document defined potential impacts to threatened and endangered species as a result of management actions proposed in this resource management plan and environmental impact statement. In their letter received July 21, 1994, the U.S. Fish and Wildlife Service stated “Based on information in the July 14, 1994, biological assessment for the Big Dry Resource Management Plan, (we) concur with the “may affect - beneficial” finding for the piping plover and with the “is not likely to adversely affect” finding for bald eagle, whooping crane, peregrine falcon, least tern, black-footed ferret, and pallid sturgeon” (see Wildlife appendix).

Comments and Responses

In the oral statements given during the public meetings, the 170 letters received on the Draft Resource Management Plan and Environmental Impact Statement, and the two letters received on the newly proposed areas of critical environmental concern were over 400 individual comments. These letters are available at the Big Dry Resource Area office. Approximately 75 percent of the comments were considered to be substantive comments on the content of the draft resource management plan and environmental impact statement. The comments (1) addressed the adequacy, inaccuracies, and discrepancies in the analysis; (2) identified what were considered to be either new impacts, alternatives, and mitigation measures, or (3) disagreed with significance determinations. The remainder of the comments were considered to be expressions of personal preference or opinion.

Comments received on the draft resource management plan and environmental impact statement and the newly proposed areas of critical environmental concern have been grouped below by major topic. Some comments could have been placed under more than one topic, but were placed only under one. For example, the comment that the public land open to off-road vehicle use is fragile and susceptible to erosion is listed under the recreation topic, but could have been listed under soil, water, and air.

Those comments considered to be substantive appear first under each topic heading. Appropriate discussion or responses to substantive comments appears next under each topic. Often text revisions to the final resource management

plan were considered to be the appropriate response; this is noted where appropriate. Expressions of personal preference and opinions are listed following the responses to the substantive comments. Preferences or opinions received more than once are indicated by the number of respondents who made the comment. Although no specific response is made to these statements, they have been considered in the resource management plan development and have been carefully considered along with the environmental analysis in the decision-making process.

ALTERNATIVES AND OTHER MANAGEMENT CONCERNS

Substantive Comments

1. The Environmental Protection Agency, Region 8, Montana Office has rated the draft environmental impact statement as category EC-2 (Environmental Concerns - Insufficient Information). The document does not adequately display environmental effects of the proposed action. A cumulative effects analysis of past and projected activities was not completed.
2. A greater range of alternatives should have been considered.
3. Analyze in detail the Big Open concept as a separate alternative or as a component of an already analyzed alternative.
4. The level of analysis of the alternatives is inadequate. For example, in chapter 4, oil and gas only looks at the impact of stipulations on the development of oil and gas resources and fails to look at whether the stipulations proposed adequately protect the important values of the resource area.
5. BLM should include the “Ecological Health” idea into their land management policies.
6. Adequate protection of all areas of critical environmental concern needs to be implemented, including protection from oil, gas, mining, and grazing developments, and off-road vehicle use.
7. The maps need numbers.
8. The federal government must include analyses of historic cultural, economic, social or health effects.
9. The scale of government financial support is not adequately accounted for in the document.

Responses

1. See text changes in impact analyses and cumulative impact analyses, chapter 4.
2. Alternatives must be “reasonable” and include a “no action” (current situation) alternative per the National Environmental Policy Act. A range of alternatives were formulated during scoping and have been refined throughout the environmental impact statement process. All alternatives suggested by the public were considered. Those not selected for further analysis appear in the beginning of chapter 2 with associated rationale. Each alternative represents an alternative means of satisfying or resolving the issues.
3. See the beginning of chapter 2 under “Big Open” for why the Big Open concept was considered but not analyzed in detail in the document.
4. The “Oil and Gas” section of chapter 4 only shows impacts to oil and gas. To see impacts to other resources, look under that resource heading. For example, impacts to wildlife are under “Wildlife.”
5. BLM is in the process of formulating policy that directs the Bureau to do ecosystem management, which is ecological health.
6. The preferred decisions will protect the areas of critical environmental concern (see chapter 4 addressing impacts).
7. The maps now have numbers.
8. See chapter 4 for impacts to those items listed.
9. The scope of the analyses is limited to analyzing the economic impacts of a range of management actions for BLM-administered resources. This document does discuss BLM’s contribution to the area economy.
5. Alternative C should be adopted (6).
6. Alternative D should be adopted (4).
7. The Plan should manage for nature and offer more protection from economic interests (6).
8. Revise the plan to consider long-term sustainability and ecosystem conservation.
9. The scoping process relies too much on input from a small core of local individuals who desire to preserve the status quo.
10. Not all of the BLM area of critical environmental concern nominations are viable.
11. Support the designation of additional areas of critical environmental concern and the improvements in environmental protection.
12. In light of industry downsizing, the economic hardships on resource producers and the ever-shrinking public land base available for multiple-use activities, the BLM should retain and enhance the substantial economic base which is provided by the principal industries in the Big Dry Resource Area - livestock, ranching, farming, oil and gas, and hunting (5).
13. Allow oil and gas leasing except in areas of environmental concern to enhance the economy and instead of obtaining it from overseas.

Preferences and Opinions

1. Alternative A should be adopted (2).
2. Support commercial use of public lands done in an environmentally responsible manner.
3. Neither Alternative B nor Alternative C is the answer.
4. Alternatives B and D are improvements over Alternative A.

CULTURAL RESOURCES

Substantive Comments

1. There are no records of findings of eligibility for the Big Sheep Mountain, Jordan Bison Kill or Seline sites.
2. As part of their designation as areas of critical environmental concern each of the cultural sites should be formally nominated for listing on the National Register of Historic Places in consultation with the Keeper of the National Register.
3. As relatively few sites have been formally evaluated, the number of significant sites may well exceed the 1 to 7 to 10 figure used in predicting or projecting future impacts to “eligible” cultural resources. Of the approximately 350 historic and prehistoric sites formally evaluated statewide in consultation with the Montana State Historic Preservation Office in 1992,

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over one- third of these sites were determined to be eligible for the National Register.

4. Consideration of the sites in the Cherry Creek Special Recreation Management Area as a unit is an appropriate approach.
5. Mitigation pertains to impacts and not to cultural resources.
6. Distinguish those sites which have been recommended as eligible or ineligible by the BLM and those for which consultation has occurred with Montana State Historic Preservation Office or the Keeper of the Register.
7. Fire suppression is not exempt from Section 106 compliance.
8. Effects of fire on archaeological sites indicate that rehabilitation activities have a high potential for impact.
9. For the purposes of Section 106 of the National Historic Preservation Act, no distinction is made between properties that are formally nominated and listed on the National Register and properties that are determined to be eligible for the National Register through consultation. There should be no distinction in relation to coal leasing between “determined eligible” and “listed.”
10. Fort Union Trading Post National Historic Site is mentioned only briefly on maps.
11. The Powder River Depot site does not have associations with fur traders and Lewis and Clark.
12. BLM should mention the partnership potential with Burlington Northern Railroad for the Powder River Depot.
13. The Miles/Sitting Bull site of October 21, 1876, located on Cedar Creek warrants inclusion as an area of critical environmental concern.
14. BLM should reconsider its recommendation of not making the Miles/Sitting Bull Fight an area of critical environmental concern. Mineral activities should be prohibited.
15. The bibliography should acknowledge Lisle G. Brown’s, “The Yellowstone Supply Depot,” and “Yellowstone Command: Colonel Nelson A. Miles and the Great Sioux War, 1876-1877” (Lincoln and

London: University of Nebraska Press, 1991). The text and bibliography should also acknowledge the Lewis and Clark journals prepared by Gary Moulton.

16. The monitoring plan for cultural resources is insufficient to protect critically valuable resources.
17. The effects to historic values of pre-columbian cultures need to be considered.
18. BLM should not set goals to acquire so many properties each year or in 20 years.
19. The 500 cultural properties would be a negative impact on the economy of our area, limiting multiple use.
20. There are two graves at the Powder River Depot.

Responses

1. The text has been changed to reflect: formal determinations of eligibility on cultural resource sites, mitigation wording, fire impacts and wording, incorrect references to the Powder River Depot, and bibliography changes. See chapter 4, “Cultural Resources” for impacts to pre-columbian cultures.
2. As part of the development of cultural resource area of critical environmental concern management plans, sites will be considered for formal nomination for listing on the National Register of Historic Places.
3. Sites determined by BLM to be significant, but not evaluated by the Montana State Historic Preservation Office were also used in making the assumption for number of significant sites in the planning area. Assumptions were not made statewide. This accounts for the difference in figures.
4. The Cherry Creek Special Recreation Management Area sites will be considered as a unit.
5. See response 1 above.
6. See response 1 above.
7. See response 1 above.
8. See response 1 above.
9. The finding of areas unsuitable for coal leasing is not a distinction that BLM makes. This distinction is clearly made in 43 CFR 3461.5 (g) (1) regulations,

criterion 7, which states that only sites formally listed can be found unsuitable.

10. Fort Union Trading Post National Historic Site is not mentioned in the document because there is no BLM-administered land in the site's immediate vicinity. BLM has no control or opportunity to manage the lands surrounding the site.
11. See response 1 above.
12. Partnership potential with Burlington Northern will be explored at the activity planning stage.
13. The exact location of the Miles/Sitting Bull site has not yet been determined. If the site is found to be important and relevant in the future, further planning would be conducted (see beginning of chapter 2 for further discussion). In the meantime, the site is protected from BLM authorized activities in that when a project is proposed, an archaeological survey of the area is conducted. If the site is found during the survey, the site would be recommended as eligible to the National Register of Historic Places, and avoided from activity, including oil and gas development and mineral material permits and sales; thereby protecting the site.
14. See response 13 above.
15. See response 1 above.
16. The monitoring schedule for cultural resources has been sufficient to detect any deteriorating trends, of which there have been little or none.
17. See response 1 above.
18. BLM does not propose to acquire a set number of cultural properties per year or in 20 years. BLM does have figures for how many sites could be acquired due to land adjustments for other resources or "blocking." As lands are exchanged, so (generally) are the cultural properties located within them. Development may be restricted on the 50 to 71 significant cultural sites.
19. See response 18 above.
20. See response 1 above.

Preferences and Opinions

1. Mitigation of the transfer of significant cultural resources out of federal ownership by eligible site acquisition is not a preferred mitigative alternative.

FIRE MANAGEMENT

Substantive Comments

1. Will prescribed burning be used to burn sagebrush as a range management tool?

Responses

1. Sagebrush will be managed but not eliminated. As the document states, sagebrush cover will be left if possible.

Preferences and Opinions

1. Advocate properly managed sagebrush burning as a range improvement tool (2).

LANDS

Substantive Comments

1. The Prairie County Commissioners have taken the road through our ranch in T14N, R51E off the county tax maps.
2. The road identified as public access in sections 11, 12, 14, 15, 19, 20, and 21; T. 17 N., R. 31 E., was abandoned by the County Commissioners on August 10, 1992, and therefore is no longer a public access road.
3. Are the BLM roads open to public use? Are they maintained? Are there signs?
4. No mention is made of the need for any public access to the 6 tracts in excess of 20,000 acres or any of lesser magnitude.
5. BLM land along the river should be marked with signs that warn sportsmen to be aware of trespassing on the adjoining private land.

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6. Oppose any involvement with the Department of Fish, Wildlife and Parks Block Management Program without site specific public hearings on any deviation from current BLM access policies.
7. The landowner should be notified when BLM issues paleontology permits because paleontology permittees are crossing private lands without permission.
8. A map sent BLM asked for 300 acres for the landfill due to the need for a buffer zone, we did not want 640 acres.
9. The landfill site is on top of a hill with dams to the east and south, and a running creek to the north. Where is the drainage to go and what about seeping and run-off? Why after all these years did the reclamation on the road near the proposed landfill happen now?
10. The county land use plan should be referred to before any acquisition or exchange takes place.
11. Will direct sales or trades be emphasized?
12. Why did you not make a tissue overlay, as you did for locations of federal minerals, to show areas that are proposed for retention or disposal?
13. "Both parties willing" language should be added to the general criteria for acquisition.
14. Townships 17N-R39E, 18N-39E, 17N-40E, and 18N-40E should not be targeted for retention because of the numerous tracts of small BLM acreages such as 40 to 120 acres.
15. The map of lands to be "retained" leaves out lands north of the Yellowstone and west of Miles City.
16. Oppose the disposal through Recreation and Public Purposes Act for Makoshika State Park based on: the lands are not accessible from existing park boundaries or from existing park roads because these lands intermingle with private lands; these lands are within areas with noxious weeds; are extremely fragile and will not withstand any off-road motorized traffic and increased accessibility to the Park would increase soil erosion; ranches involved with these lands would need to reduce livestock numbers or may be forced out of business, further reducing the county tax valuation and hence, public services.
17. If the area proposed for off-road vehicle use has no public benefit, why does the retention and disposal area map show the areas south and east of Glendive as retention areas?

18. BLM administers considerably more than 10 percent of the land within the confines of the Big Open and total public landownership is closer to 40 percent. It was precisely the point of the concept that new arrangements between private and public land managers would have to be made if wildlife were to flourish, because the landownership was intermingled. No laws are violated in the Big Open concept. The BLM is already involved cooperatively with other agencies and private landowners. As the manager of the largest land area in the Big Open, the BLM is the senior entity and should take a leadership role in new land management concepts.

Responses

1. The roads that are no longer public access have been deleted on the maps in this final document.
2. See response 1 above.
3. BLM roads provide legal access for the public. Some signing and maintenance exists; however, this is an ongoing project.
4. Access needs are identified on map 29. See also additional text in "Lands" section in chapter 2, under "Management Common to All Alternatives".
5. Signing public lands along the rivers was considered but not analyzed in detail. Signing areas of intensive public use is an ongoing project and accomplished as time and funding allows.
6. The BLM enters into agreements with Montana Department of Fish, Wildlife and Parks in block management areas. When legally accessible public lands are proposed for closure (for access) during hunting season, the public would be notified in the Federal Register.
7. BLM issues paleontological permits for scientific study on public lands. These permits in no way authorize permittees to cross private lands, and state that permission must be obtained by the permittee prior to crossing private lands to access public lands.
8. The Fallon County Commissioners requested 640 acres for a proposed landfill in a letter dated February 8, 1990. Less acreage was considered as an alternative.
9. The landfill site is proposed on top of a hill, where run-in water is minimal and is seen as optimal for a landfill site. This reduces the amount of water with

the potential to percolate through the landfill and carry with it substances to the ground or surface waters. Dams below will not be impacted as the landfill is designed so minimal water run-off (such as constructing leachate ponds) would occur. Fallon County must submit a plan of operations for controlling run-off to the state of Montana prior to approval for the site. The road near the proposed landfill was constructed by an oil company to provide access to an oil well. The oil well was abandoned and the oil company was required to reclaim the oil pad and access road on the public land.

10. In accordance with the Federal Land Policy and Management Act of 1976, BLM will use germane county land use plans in the development of land use plans for the public.
11. With the emphasis on land trades (versus sales), “both parties willing” language has been added to the plan. The four retention zones in T. 17 N., 18 N. and R. 39, 40 E. contain over 32 sections of blocked land within two large blocks and numerous scattered tracts. The scattered tracts will be retained for exchanging to facilitate access and increase block size.
12. Rather than a tissue overlay, this map was created to provide the viewer with a general idea of land acquisition and disposal areas. The retention area around Miles City has been corrected.
13. See response 11 above.
14. See response 11 above.
15. See response 12 above.
16. After considering comments on the Recreation and Public Purposes Act for Makoshika State Park (such as some sections not legally accessible) the proposed area was modified. For impacts to resources from the new decision, see Alternative D in chapter 4. Increased activity into the Park will increase erosion above the amount that is natural. Montana Department of Fish, Wildlife and Parks will be the managers for the area. Impacts from loss of animal unit months are found in chapter 4, “Livestock” and “Socioeconomic” sections.
17. The area south and east of Glendive does have public values, one of which is off-road vehicle use.
18. For discussion on the “Big Open” see “Alternatives Considered But Not Analyzed In Detail” at the beginning of chapter 2 under “Big Open”.

Preferences and Opinions

1. Provide more public access.
2. Oil and gas companies should arrange for permanent legal public access to public lands via the company roads.
3. Avoid getting involved in the block management program of the Montana Department of Fish, Wildlife and Parks.
4. Support selling Fallon County 300 acres of BLM land in Section 14, T6N, R60E, Fallon County, MT., to be used for future landfill expansion of the Coral Creek Landfill (9).
5. Public land is not needed for the Fallon County landfill as the county can acquire land through private sources.
6. At a maximum, BLM should provide 160 acres for the Fallon County landfill.
7. The county should recycle, then the existing 80 acre landfill will suffice.
8. Opposed to a mega landfill (2).
9. Opposed to any change in the management or control of lands now administered by the BLM or the Montana Department of Fish, Wildlife and Parks (2).
10. Turn Makoshika over to the Montana Department of Fish, Wildlife and Parks.
11. Opposed to blocking, trading, selling or in any way changing the pattern of public land (3).
12. Support blocking public lands (2).
13. Support blocking public land, but not to service particular individuals or interest groups.
14. Establish significant blocks of public lands for management as the Big Open.
15. Support exchanging adjacent land.
16. BLM should retain section 6, instead of transferring it to the Department of Fish, Wildlife and Parks for Makoshika State Park.
17. Don’t set a goal to acquire so many acres into public ownership.

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18. There should be no increase of public land acreage through sales or trades in Prairie County.
19. Support no net loss of BLM lands (2).
20. Current users should be given the option to buy BLM land.
21. Sell areas BLM cannot manage to the Audubon Society, The Nature Conservancy or to the state of Montana.
22. Existing rights-of-way do not adversely effect the environment, so future rights-of-way wouldn't either.
23. Opposed to the recreation and public purposes transfer for Makoshika State Park.
24. Opposed to converting existing agricultural land into public access/recreational use (for Makoshika State Park).
25. Opposed to the Fallon County Sanitary Landfill.
26. Support selling public land.
5. Aren't Livestock Management Agreements really subleasing agreements? Does the BLM get fair market value for hay? Are environmental assessments written on these actions? How many cuttings are allowed?
6. Some allotment management plans have not been revised since 1966. Many allotments do not have allotment management plans including some that are good-sized, such as Pasture 4 common (1341) with 12,360 public acres. What is being done to address the backlog?
7. Has an economic assessment been performed on how the loss of animal unit months in the areas described under the preferred alternative would affect the rancher? While 5 animal unit months may not be excessive, 558 animal unit months could have a substantial effect on an individual operation. This economic effect will in turn be passed on to the community businesses and will have an effect on the local tax base.
8. The livestock tables are confusing.
9. When calculating carrying capacity, some areas are unsuitable but the same amount is paid.

LIVESTOCK GRAZING MANAGEMENT

Substantive Comments

1. Don't include "no feeding livestock" on BLM land in whatever plan you adopt.
2. The draft resource management plan and environmental impact statement states, "Public lands are managed for multiple use. Livestock grazing is a viable use of public lands." The Multiple Use Act of 1964 states that multiple use is two or more uses so livestock grazing does not have to be included in multiple use management.
3. The resource management plan and environmental impact statement should incorporate the Montana Grazing Best Management Practices into allotment management plans.
4. BLM policy is to restore and maintain riparian/wetland areas so that 75 percent or more are in proper functioning condition by 1997. What is "proper functioning" condition? Will BLM achieve this policy objective?
10. Livestock grazing will be cancelled on public lands transferred for Makoshika State Park. Does that mean there will be no grazing?
11. In spring developments are we going to be held to use corrugated pipe or can we use plastic or cement systems?
12. Where are the 950 acres that are in fair condition on allotment 1288?
13. In allotment 1123, 128 animal unit months per section times 3 sections in this unit equals a total of 384 animal unit months. The charge is for 491 animal unit months. Either there is an error or an overcharge of 107 animal unit months on allotment 1123.
14. The total acres for allotment 347 is 1,000 versus 960. Apparently, the 40 acres in NENE Section 18, T. 12 N., R. 36 E., was overlooked in your acreage compilations. Please adjust your records accordingly.
15. We must maintain a responsible cooperative effort in managing public lands. The permittee should be more involved in decisions, each permittee affected should personally be contacted.

Responses

1. BLM national directions and standards do not allow maintenance feeding of hay on public lands. The decision to allow maintenance feeding cannot be made at the resource level. Supplemental feeding is allowed with the approval from the authorized officer.
2. The authorizations and requirements of the Classification and Multiple Use Act were terminated. See the Federal Land Policy and Management Act of 1976 for the definition of "multiple use." The document follows present rangeland policy and is consistent with the recommendation and decisions of the Missouri Breaks Grazing Environmental Statement Final (USDI, BLM 1979a), the Prairie Potholes Environmental Impact Statement Vegetation Allocation Final (USDI, BLM 1981c), and the Big Dry Environmental Impact Statement Vegetation Allocation (USDI, BLM 1982b). The purpose of a rangeland management program is to provide guidelines for managing resources and related ecosystems.
3. The BLM will use the Montana Grazing Best Management Practices as guidelines for grazing in riparian/wetland areas. Those draft best management practices were included in the "Vegetation" section of chapter 2.
4. A BLM Technical Reference entitled "Process for Assessing Proper Functioning Condition" (TR 1737-9) defines proper functioning condition. This definition has been added to the glossary. As stated in the "Livestock Grazing Management" section in chapter 4, 12 allotments in need of riparian improvement will be given priority for activity plan development. Those allotments are identified in the Livestock appendix. In addition, priority will be given to other allotments as they are identified and in need of riparian improvement. Attainment of the goal of having 75 percent or more of the riparian/wetland areas in proper functioning condition by 1997 will depend on funding.
5. The issue of subleasing and its definition is determined by national BLM policy. The current livestock management agreement form is identified as MT-4100-1 (February 1989). This form is approved by the BLM Montana State Office and is currently under revision. The BLM does get fair market value for haying. The charge is based on a Montana Agricultural Lease Survey compiled by the BLM Montana State Office, which is based on an average for dryland hay within the Miles City trade area. The guidelines for cutting hay are identified in the resource management plan and the impacts analyzed. Each request for hay cutting requires preauthorization.
6. Some of the allotment management plans that were written in 1966 are in need of revision. Others are meeting the objectives and have no need for revision. The allotment identified as number 1341 is categorized as an "I" or "Improve" category allotment. These allotments receive the highest priority as discussed in the Livestock appendix.
7. Economic assessments were not performed on individual ranch units as part of this analysis. Before grazing reductions are implemented, there would be a separate analysis which would include an economic assessment. Economic assessments have been made for the planning area.
8. See changes in the Livestock appendix, table 53.
9. Some areas are rougher and not as valuable for livestock grazing, which is taken into consideration when calculating carrying capacity. The Big Dry Resource Area does not have any latitude to make fee adjustments. Grazing fees are set at a national level.
10. When the public lands are transferred for Makoshika State Park, BLM administration on those lands will be cancelled. Grazing authorized would be managed by the Montana Department of Fish, Wildlife and Parks. The Montana Department of Fish, Wildlife and Parks has indicated

"Grazing will be allowed in the Park where it does not detract from park or wildlife values. Grazing would be continued on the transferred lands. Suitable grazing management plans would be developed for the properties. When existing leases expire they would be offered for competitive bid with the current lessee(s) given the right to meet the high bid." (Letter to Governor dated June 14, 1993.)
11. See text changes in Engineering appendix (springs).
12. Allotments 347 and 1288 had data errors. See those changes in the Livestock appendix.
13. In allotment 1123, the carrying capacity of the section in question is 145 animal unit months. Another section in the allotment was given a higher rating giving the unit a total of 491 animal unit months on public land. The billing for each allotment is based on the application that the livestock operator submits each year. A livestock operator can request temporary changes in livestock numbers, season of use, or

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class of livestock each year during application time. A temporary reduction may be requested due to drought or insect damage. Permanent reductions may be made following consultation and coordination with the livestock operator if resource conditions or conflicts warrant a permanent change. At this point in time, resource data does not exist which would support a permanent change in the animal unit months for allotment 1123.

14. See response 12 above.
15. Consultation, cooperation and coordination with affected interests, such as a livestock permittee is an integral part of the system. Cooperation by the permittee and lessee has been a key element in the overall good and excellent range conditions in the resource area. The Big Dry Resource Management Plan and Environmental Impact Statement offers permittees an opportunity for involvement in long-term planning for the resource area.

Preferences and Opinions

1. Utilize the grazing lands by livestock grazing.
2. Adjust grazing fees according to resource conditions as they change due to rainfall.
3. No restrictions on livestock grazing in crucial winter range areas. Wildlife numbers are at an all time high and livestock and wildlife are compatible.
4. Encourage multiple use (including livestock grazing) of public lands.

MINERALS

COAL

Substantive Comments

1. The resource management plan and environmental impact statement adopts a first-come, first-served approach to resolve coal versus oil and gas production conflicts. A best use resource management approach should consider the development of coal first. By considering coal first both resources may be developed rather than one at the expense of the other.
2. Federal coal exchange or leasing constitutes a major federal action that significantly affects the human

environment; therefore, requires a separate environmental impact statement, not merely an environmental assessment.

3. Why haven't thresholds for coal development impacts been considered in the resource management plan and environmental impact statement? BLM must address the negative social, environmental, and economic impacts of coal development on rural communities and agriculture, including the effects of decreased water quality and quantity, and the damage to crops and livestock from air pollution.
4. The projections made in this resource management plan and environmental impact statement on construction, employment, and income are meaningless until a site specific proposal is made. This analysis is biased and unrealistic because it quantifies the payroll figures but does not quantify the costs to the community from increased demand for services from immigrating workers or the loss of agricultural productivity from coal development.
5. Why haven't any screens been applied to federal coal? Why didn't the BLM apply unsuitability criteria to coal areas considered acceptable to leasing?
6. Why haven't any federal coal acres been found unacceptable for further consideration for coal leasing due to surface owner consultation? Why hasn't BLM taken steps to consult landowners who have subsurface rights about federal coal? Why isn't the surface owner consent done after the first screen? BLM appears to have confused the timing of surface owner consultation and surface owner consent.
7. It has been in the past the policy of BLM to not put up for lease blocks of coal that had a surface owner refusal to consent. This policy should remain and also apply to an action on exchanging of coal.
8. BLM should advocate recertifying the Fort Union Coal Region should significant interest in coal leasing be shown. This would provide for more adequate planning and analysis of impacts from coal leasing and exchanges.
9. If the Fort Union Coal Region is decertified and if coal development is not an issue in this document, the line "Grazing would be canceled for coal development (640 to 830 animal unit months on 3400 to 4400 acres each year) during the 40 year mine life" should be deleted. This is the only negative impact on agriculture from coal development that is quantified in this document but it is not mentioned in the

Socioeconomics appendix where the impacts are discussed.

10. BLM should commit to an aggressive public participation program that will involve the people of the region in future permitting, plan amendments and other land use planning and coal management decisions.

Responses

1. The issue of coal versus oil and gas conflicts is currently under review by BLM. While favoring coal over oil and gas has its logic, such a system creates a problem of how long to hold off development of a well while waiting for interest in the overlying coal to evolve.
2. The introduction to chapter 4 states that an environmental impact statement would be done if BLM receives a site-specific coal lease application and mine plan. BLM Manual Handbook 3420-1 outlines how an environmental assessment would appropriate in the case of a coal license or most small lease modifications. In instances where the acreage involved is small (a few acres) or the action is merely a continuance within an existing mine, an environmental assessment may satisfactorily address any issues. The environmental assessment would provide sufficient evidence and analysis of impacts on the quality of the human environment to support a determination of no significant impacts or a determination to prepare an environmental impact statement. If the impacts require a more comprehensive analysis, an environmental impact statement would be done.
3. Because there were no specific coal development proposals, a generic mine and power plant proposal was used to discuss the type of impacts and activities associated with typical mine-mouth plants in the Fort Union Region. Impacts are included by alternative for each resource. Threshold analysis is usually only called for where proposed development is pushing some resource values to its limit; mostly threatened and endangered species habitat. There is no development proposed in this case. The impacts to communities and agriculture are discussed in the Socioeconomic appendix. Because there are no specific proposals, the impacts are qualitative rather than quantitative.
4. Employment levels, income, and population in-migration have been quantified in previous analyses of development proposals and included in the

Socioeconomics appendix. The specific cost to a community to provide needed services depends upon a community's existing capacities. Because there are no existing development proposals, it was decided to discuss impacts in general terms.

5. The "Coal" section of the Minerals appendix details the unsuitability screening that was done on the identified coal areas. All but identification of alluvial valley floors and landowner consultation are in this document. Alluvial valley floor designation is in the purview of the state of Montana and is normally done by the Department of State Lands when a specific application area is under consideration.
6. In the absence of any expressed interest in further coal leasing for the near future, and no specific geographic area to focus on, the process of landowner consultation could not be conducted at this time. The Surface Mining and Control Act (1977) Section 714(d) states: "... the secretary [of Interior] shall consult with any surface owner whose land is proposed to be included in a leasing tract...." At this time BLM has no proposals for leasing.

BLM recognizes that surface owner consultation and consent are distinctly different things. Consultation will be focused on areas of expressed interest at the start of activity planning. Areas which fail this screen will be dropped from further consideration and planning. Final qualified surface owner consent is provided by the interested company(ies) following tract delineation and before any sale can be held.

7. BLM requires the consent of qualified surface owners prior to issuance of a coal lease. This is a matter of law in the Surface Mining Control and Reclamation Act. Present law makes no provision for surface owner consent for exchanging coal.
8. If significant interest in coal leasing in the Fort Union Region develops, the BLM and the Governors of Montana and North Dakota will consider recertifying the region.
9. Impacts from coal mining are discussed in the Socioeconomics appendix and chapter 4.
10. Minimum time frames for public participation activities are:

15 days

any notice request inviting the public to attend a public participation activity
notice of a hearing on potential coal leasing

30 days

any notice requesting written comments, unless otherwise stipulated
Annual Schedule and Status Report
notice at the outset of the planning process (Notice of Intent)
notice of the availability of proposed planning criteria
period for surface owners to express preference when coal is involved
period BLM record of a public participation activity is open
notice (Environmental Protection Agency) of filing of final environmental impact statement on resource management plan or category 2 plan amendment
notice of effective date for plan amendment not requiring an environmental impact statement
period for filing a protest
period Governor may appeal unresolved inconsistencies to the Director
notice of any significant change made to a proposed plan or amendment as a result of protest or Governor's review for consistency

60 days

period for Governor's review of proposed plan or plan amendment for inconsistencies
notice of potential area of critical environmental concern in draft plan or plan amendment

90 days

notice (Environmental Protection Agency) of filing of draft environmental impact statement and resource management plan or category 2 plan amendment

LOCATABLES

Substantive Comments

1. The resource management plan should contain sufficient detail on potentially developable mineral resources, including locatable minerals, so that potential multiple-use conflicts can be identified and mitigated.
2. It is far more appropriate in an assessment of impacts to resources to determine the quantity and quality of potentially developable mineral resources, rather than the amount of federal mineral estate being affected by other resource management priorities. This concern holds particularly true for the assessment of

impacts to bentonite. To assess the impacts to bentonite resources, a mineral potential map showing areas of high and moderate potential needs to be completed. These potential areas then need to be compared to areas where other management priorities will conflict. Similar comparisons as this were done in the resource management plan for coal, and oil and gas. This should also be done for bentonite resources; the only locatable mineral resource within the Big Dry Resource Area with any apparent potential for future development.

Responses

1. Analyses were conducted assuming only one active locatable permit in 20 years. There is minimal potential for locatable mineral development in the planning area; therefore the resource management plan does not project future conflicts. Should locatable mineral development become an issue in the future, further planning would be conducted.
2. The occurrence and distribution of bentonite minerals are the same beneath the entire planning area, in Cretaceous and Tertiary sedimentary rocks (Berg 1969). The resource management plan shows the occurrences of interest (mining claims) on maps 9A,B,C, and D for all locatable minerals.

MINERAL MATERIALS

Preferences and Opinions

1. BLM should continue to allow the retrieval of gravel from federal lands.

OIL & GAS

Substantive Comments

1. There is no discussion or listing of area-wide operating standards, guidelines, or mitigation measures for oil and gas companies with which they must comply during the various phases of operations. Disclosure of this information would be in compliance with Council on Environmental Quality and National Environmental Policy Act regulations. This information is vital to the industry for a variety of reasons. Among the most important, the potential for an increased cost of doing business in this area.

2. There are no maps showing the location of federal oil and gas estate, areas with potential for oil and gas, or areas currently under oil and gas lease. Oil and gas potential should be considered in resource allocation decisions.
3. It must be specifically shown that less restrictive measures were considered but found inadequate to protect the resource in question. The possibility that there may be conflicts between certain uses or values does not necessarily warrant the use of restrictive stipulations. BLM fails to include an alternative for leasing with standard terms and conditions. The plan has not met the analytical specifications of the fluid minerals supplemental program guidance or the disclosure requirements of the National Environmental Policy Act.
4. The BLM needs to clearly define potential impacts to sensitive resource values. For example, in chapter 4, BLM discusses environmental consequences of alternative management scenarios on cultural resources. It states, "Over the next 20 years, cumulative impacts could occur as a result of surface disturbing activities, land tenure adjustments, and oil and gas developments." There is no discussion detailing the potential conflicts between oil and gas development and cultural resources or the types of impacts which could occur or whether they could be mitigated. It should be noted that were it not for oil and gas activities, many valuable cultural sites would not have been discovered because they would not have been encountered. Not only do companies conduct archaeological surveys prior to commencing activities, if a company unearths a cultural site, the law requires companies to halt operations and to notify the proper authorities who will decide how to proceed in the area.
5. BLM intends to close certain areas to geophysical exploration, and admits in the Minerals appendix that there are several types of geophysical operations which do not cause surface disturbance, such as remote sensing, gravity sensing and aeromagnetic surveying. In fact, in most cases, geophysical operations do not result in any appreciable surface disturbance. Oddly, the BLM states "Blading and road construction for seismic operations are not usually allowed so that environmental impacts are minimized." Unaware of any seismic exploration techniques which require a road or trail to be constructed. Believe it would be more reasonable for the BLM to consider geophysical operations on a case-by-case basis in sensitive areas rather than imposing a blanket prohibition.
6. Disagree with the assertion in the "Wildlife" section of chapter 4 that the negative impacts of oil and gas development on wildlife are of high magnitude. The plan states, "...the overall impact to wildlife from (oil and gas development) would be negative as subsequent production type activities would be authorized year-round. Developing locatable minerals and removal of mineral materials would have a minimal impact on wildlife habitat." This discussion maintains that oil and gas production has a significant impact on wildlife habitat while other mineral development activities have minimal impacts. The plan later states, "about 180 public acres of crucial winter range would be altered or lost, based on the projected number of wells to be drilled during the life of this plan." To put this in its proper context, there are over 700,000 acres of crucial winter range located on public lands in the planning area. The effects from projected oil and gas activities would affect far less than one-half of one percent of the total winter range. This is not a significant impact or a permanent condition. Once operations are completed, impacted areas would be returned to their original condition: productive winter range habitat.
7. The draft environmental impact statement lacked data to support the projected number of wells to be drilled.
8. In regard to surface disturbance figures, the BLM does not always distinguish between short-term disturbance associated with exploration, and disturbance associated with long-term production activities in its analysis, because it is assumed that it takes 5 years to reclaim a site. Nevertheless, the assumption that 3,555 acres will be disturbed (5.5 acres per well) over the next five years is not entirely accurate because, according to BLM's figures, 2,311 acres would be abandoned and reclaimed and therefore unoccupied for the entire 5-year period. Reclamation must be considered when calculating long-range impacts over the life of the plan.
9. Recommend a slight modification in the wording of the stipulations so they apply only when the resource being protected is present on the lease or, more specifically, in the area proposed for activity. This strategy would avoid needless delays in operations and would eliminate the need for insignificant waiver, exceptions, or modifications.
10. Stipulations intended to limit oil and gas activities during elk spring calving or other periods less than 60 days are unnecessary. As is noted in the regulations at 43 CFR 3101.1-2, Surface Use, and recently estab-

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lished BLM policy, under standard lease terms and conditions, the BLM has the authority to restrict activity for up to 60 days in any lease year. Therefore, all timing stipulations less than 60 days in duration should be eliminated and a lease notice should be used in their place.

11. The BLM has not discussed that valid existing rights will be honored under the new plan. BLM needs to specify in the final planning documents if and how valid existing lease rights could be impacted by the new leasing decisions.
12. Object to BLM's discussion contained in the summary and chapter 1 of the draft environmental impact statement for the second issue which deals with Resource Accessibility and Availability of public lands. Perhaps a better way to characterize the situation BLM is trying to avoid would be to use the term "unlimited" access because "open" access merely implies that lands are available to multiple-use activities.
13. Most of the 2,096,475 acres designated as "moderate" should be upgraded to "high" potential.
14. Fort Peck Indian Reservation production should also be included in BLM's oil and gas potential analyses because it is part of the same producing basin and adds 76 million barrels of oil and 8 thousand cubic feet of gas from 27 fields.
15. Geophysical data is a key element in exploration and development in the Big Dry Resource Area and, therefore, the status of geophysical operations relative to limited off-road rules should be specified. Perhaps geophysical operations should be designated as a "necessary task."
16. The plan indicates there are 531,168,364 oil and gas acres leased in the Big Dry Resource Area. This must be a typographical error.
17. The plan failed to provide any protective stipulations for areas such as steep slopes, areas of critical environmental concern, unstable soil areas, riparian areas, raptor nesting sites, river corridors, potential wilderness areas, special recreation management areas, riparian/wetland areas, steep slopes, federal lands that lie within or adjacent to state parks (for example Makoshika State Park near Glendive), crucial wildlife habitat, and important cultural sites. All of these areas should have been given some level of protection in the plan, or not leased at all.
18. Areas that include stipulations common to all alternatives should be shown on maps.
19. The plan provides for almost uncontrolled oil and gas development throughout the resource area. It proposes leasing over 99.9 percent of the available lands and mineral estate open to oil and gas development. The timing stipulations to protect crucial winter ranges are only applicable during exploration and development and not during the production phase of oil and gas development. Since the production phase can last decades, wildlife would be displaced. Less than .1 percent of the planning area will receive a no surface occupancy stipulation. A controlled surface use stipulation is placed on the black-footed ferret area of critical environmental concern. How will this stipulation protect a reintroduced black-footed ferret population if oil and gas development occurs in the oil and gas area?
20. Why are there no waivers, exceptions, or modification provisions for the controlled surface use stipulation in visual resource management class II areas.
21. Williston Basin (Montana Dakota Utilities) has been misappropriating natural gas from adjacent mineral owners.

Responses

1. The text has been changed in the Minerals appendix to include a list of other types of mitigation measures that may be required in addition to lease stipulations. The list is not all inclusive nor are the listed mitigation measures imposed on all lease operations. The mitigation measures are included as needed as Conditions of Approval on approved permits.
2. The federal oil and gas estate in the planning area has been classified as either moderate or high potential. These areas were considered during impact analyses and consequent decisions. The classifications were based upon the results of previous drilling and the geology of an area. The maps showing the classifications are included in the planning record which is available in the resource area office. Land and mineral ownership status plats, including current federal oil and gas leases and high and moderate oil and gas potential development maps, are maintained in each BLM office and are available for public inspection. Printed copies of the plats are available by purchase. Lease status can change on a daily basis; therefore it would not be accurate or beneficial in the long term to include such a map in the document.

3. During analysis of the management situation, BLM resource specialists determined the least restrictive form of oil and gas management that could be used while still protecting other resources. Leasing with standard terms and conditions was considered during this process. These determinations are summarized in table 4 of Minerals in chapter 2, under the “Oil and Gas” section.

A comparison of lease constraints is presented in tables 4-8. Alternative C (table 7) represents the alternative that considers the greatest area for leasing under standard terms and conditions out of all of the alternatives analyzed in detail. The impacts to resources from oil and gas activities and the need for resource protection are described in chapter 4 as well as the adequacy of protection afforded by lease terms and lease stipulations.
4. Each alternative in the “Cultural Resources” section of chapter 4, combined with the Management Common section, addresses impacts from oil and gas activities. See changes in text. Impacts from oil and gas activities are similar in nature to other actions, and have been grouped together in surface disturbing activities. In the opening paragraph of the “Cultural Resources” section in chapter 3, it states that most of the inventories conducted within the planning area have been a result of project initiated survey of which oil and gas activities would be included.
5. Bladed trails have occurred from snow removal for geophysical exploration. Geophysical exploration has the potential to alter underground burrows. These are protected from geophysical exploration. The impacts to wildlife from geophysical exploration involve more than surface disturbance, such as the noise and visual disturbances to wintering wildlife. The statement that BLM has closed crucial winter range to geophysical exploration is not correct; geophysical exploration would not be allowed from December 1 through March 31, but is open the remainder of the year.
6. It would appear that 180 acres of crucial winter range out of 700,000 is insignificant. However, the crucial winter range in the planning area is not contiguous. Losing a parcel could be significant for those animals dependent on that parcel of crucial winter range, through elimination of habitat and disturbance to the animals. In addition, usually rehabilitated oil pads have shrub communities that were replaced with grass. In terms of locatable mineral and mineral material removal, generally their impact to wildlife is minimal as bentonite mining has a low probability of occurring; sand and gravel has the highest probability for extraction and is regulated to minimize the impact to wildlife.
7. Projections for the number of wells drilled were made by reviewing geologic and drilling data from the past 15 years. Data sources used are referenced in the “Oil and Gas” section of the Minerals appendix.
8. Table 41 in the “Oil and Gas” section of chapter 4 shows the maximum acreage likely to be initially disturbed for well sites during the next 5 years. Of the total 3,555 acres projected to be disturbed (5.2 acres per well), 1,238 acres would be associated with wells completed for production and 2,317 acres would be associated with wells completed as dry holes. For the purpose of impact analyses, the maximum acreage projected to be disturbed by a well site and access road were evaluated, although reclamation will restore the disturbed acreage in both the short term and the long term. Reclamation work would be conducted at producing well sites for the area not needed for production activities and for the remainder of the disturbed area at the time of abandonment and immediately for the entire disturbed area at dry holes.
9. The stipulations to oil and gas have been worded to address a specific resource or resource need. Based upon existing information at the time of lease issuance, a stipulation would only be attached to the lease when the resource has been identified on the lease area. If circumstances or information are different at the time lease operations are proposed, the Operator can apply for a waiver, exception or modification which should be approved during normal application processing time frame.
10. Timing limitation stipulations included in the document are for time periods greater than the 60 days provided for in the regulations. As an example, the stipulation for elk spring calving range is from April 1 to June 15, or 76 days.
11. The text in the “Oil and Gas” section of chapter 2, “Management Common To All Alternatives,” has been changed to include a discussion about valid existing lease rights.
12. See text change in chapter 1 from “open” access to “uncontrolled.”
13. The high and moderate classifications are based upon the geologic environment and the reported mineral occurrences. The purpose of classifying an area was to help develop the Reasonably Foreseeable Development

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opment scenario which provides a projection of possible drilling in the area in the next 20 years. The classification should not affect leasing decisions or the application of lease stipulations.

14. The Bureau of Indian Affairs has responsibility for issuing oil and gas leases and conducting the associated environmental analysis for the Fort Peck Indian Reservation. The production history and potential does not affect the impact analysis for the planning area except for cumulative effects such as air quality.
15. As stated under the "Recreation" section in chapter 2 for the "limited" off-road vehicle definition, geophysical exploration is allowed in the list of "authorized or permitted uses." For those areas closed to any type of geophysical exploration, see the "Oil and Gas" section in chapter 2, table 9 under Alternative D.
16. See text change from 531,168,364 to 531,168.364 oil and gas acres.
17. The plan shows areas of the federal oil and gas estate which are closed to leasing because of the incompatibility of oil and gas activities, including mitigation measures, with other resources or land uses. See text changes in Alternative B for additional areas considered for closure to oil and gas leasing. The plan also shows areas of the federal oil and gas estate which are open to leasing. Oil and gas development would be controlled by lease terms, lease stipulations and permit requirements which will protect other resources from oil and gas lease activities. The controlled surface use stipulation allows for development of oil and gas, provided there is no adverse impact to the resource. After analyzing potential impacts to resources from oil and gas lease activities, it was determined that special recreation management areas, wetland areas, riparian areas, steep slopes, paleontological areas of critical environmental concern, and certain wildlife habitat could be adequately protected by a "No Surface Occupancy" or "Controlled Surface Use" lease stipulations as well as lease terms and permit requirements. Oil and gas in Makoshika State Park is managed according to a memorandum of understanding between BLM, Montana Department of Fish, Wildlife and Parks and Dawson County.
18. Areas that include stipulations common to all alternatives are included in pocket maps 31A, B, C, and D. In accordance with BLM Manual 1624 requirements, maps have been included showing stipulations for the Preferred Alternative. Maps of the specific areas

are available for public inspection at the Big Dry Resource Area office.

19. See response to 17 above.
20. There are no waivers, exceptions, or modifications because a land use plan amendment would be needed to change the classification of lands. In order to maintain the visual qualities of class II lands, the operations plan for the well must meet the objectives for that class.
21. Williston Basin Interstate Pipeline Company is the approved unit operator for shallow gas on leases included in federally supervised Unit Agreements in the Cedar Creek Anticline area. The Unit Agreements include federal, private and state leases. The Unit Agreements provide for the orderly development of gas resources, conservation of gas resources for optimum recovery, and proper allocation and payment of royalties.

PALEONTOLOGY

Substantive Comments

1. The BLM should designate the Ash Creek fossil area as an area of critical environmental concern. The Ash Creek area contains significant fossil resources, including rare fossils from the end of the age of dinosaurs. The area would be best protected with the area of critical environmental concern designation.
2. In the paleontological areas of critical environmental concern, why do you include private land on your maps?
3. Several dinosaur remains have been found in McCone County and one should be returned to the county for display. If a new site for extraction of dinosaur remains is discovered, the county would work with the BLM in developing an on-site permanent visitation observatory in an effort to become an end-destination for tourists, as well as to preserve the history of the area.

Responses

1. The Ash Creek Divide area is considered for area of critical environmental concern designation in the preferred alternative of the resource management plan and final environmental impact statement.

2. Due to the size of the paleontological areas of critical environmental concern, the scale of map used did not lend itself to mapping out the private or state surface ownerships. Federal minerals that underlie those lands have special management prescriptions as outlined in this document.
3. BLM would be willing to work with the county to explore opportunities for development of a tourist site.

RECREATION

Substantive Comments

1. Are there changes to the Preferred Alternative for off-road vehicle based on other comments?
2. Any factor which will negatively affect the resource and in turn the permittee's ability to continue live-stock grazing on the public lands in Makoshika State Park must be evaluated. Watering facilities will bear the brunt of uncontrolled recreational use (target practice). The public is already causing damage on private land near the proposed Glendive open off-road vehicle area by shooting holes in water tanks, shooting water hydrants, and destroying fences. These same problems are occurring on BLM land, where the BLM has worked with the current lease holders to improve the grazing conditions. These projects improve the wildlife populations. Opening this land up to off-road use would create problems for the ranchers because of the extra maintenance on fences and watering facilities, the public overstepping the BLM territory, and increased potential for fires.
3. There is not sufficient evidence of environmental damage occurring as a result of open off-road vehicles to warrant limiting off-road vehicles.
4. The Preferred Alternative for off-road vehicle use was arrived at from public input, expressed mostly from local landowners concerned about hunters driving on public land during the hunting season.
5. Alternative D includes too many acres of open off-road vehicle use near Glendive for the following reasons: gentle grassy grazing terrain; good wildlife habitat, and the wildlife would vanish; zero use by off-road vehicles in most of the sections; the land erodes easily and off-road vehicles would accelerate this erosion creating ravines bare of vegetation, resulting in stock dams filling up, highway and railroad culverts filling up, and hay meadows and cropland on private land being covered with silt making them unusable for production of feed. Not all of the open off-road vehicle sections are legally accessible.
6. With the current budget problems the government is having, it doesn't make any sense to give up the lease money the land produces by breaking the lease the affected ranches pay to the BLM for Makoshika State Park. These ranchers also buy their supplies locally and by having less land they would have fewer cattle to buy supplies for, thus resulting in fewer dollars being spent which means less income for local governments who have enough trouble trying to balance their budgets now. Some consideration should be given to that ranch family.
7. Strongly oppose off-road vehicle use in Makoshika State Park.
8. The Park "Management of Concern area" should be excluded from any and all public printed maps. To include any private land is a breach of private rights and is no concern of any public agency.
9. BLM sections contiguous to the Park south along the existing Park area should be left in BLM management with joint cooperation management of the land. Section 6 could be used as "off-road vehicle-motorcycle" area that would serve that portion of the public well.
10. No rules or restrictions were mentioned for mountain bikes in the plan.
11. The visual resource management Class II areas seem to cover a very large area and would preclude most activities, including utility and telecommunications infrastructure development, county road improvements, stock and wildlife water developments, as well as most recreational projects. Restrictions on the visual resource management class 2 and 3 should be loosened to be a little less restrictive on range improvements and management. Water development could be limited by the restrictions on visual resource changes under classes 2 and 3.
12. Concerned that designating visual resource management areas will be establishing them as quasi-wilderness areas. What is the criteria which lead to the classification of areas as I, II, III, and IV? This was not clearly identified in the document except in the glossary and maps. The Cherry Creek and Brockway roads, Terry Badlands and Big Sheep Mountain will have restricted development because of visual resource management.

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13. Will BLM try to gain easements or do (land) trades along the Lewis and Clark Trail? That would affect landowners along the Trail. BLM should look at one certain area, rather than the whole trail. The same goes for visual considerations.
14. Oppose off-road vehicle areas, unless there is a plan in place to “reclaim” those areas.
15. Recommend BLM designate both the Yellowstone and Missouri rivers corridors as special recreation management areas, and develop a system of put-ins, take-outs and picnic and camping spots along the rivers. The two rivers are tremendous recreational resource and their potential values are not being recognized in the resource management plan.
16. Why is there no mention of the use by guides and outfitters? BLM needs to be mindful of the situation and not permit overuse of the public lands. Will the information be forthcoming in a future BLM document, such as a supplement to the resource management plan and environmental impact statement?
17. Limit or close the Calypso Trail to motorized use. Leaving it open could impact the Terry Badlands Wilderness Study Area.
18. Cherry Creek dam should be dropped from the plan. Purchasing water from the Bureau of Reclamation for \$1,300,000 per year plus the pumping costs of \$75,000 far exceed the economic benefits derived from the dam. The cost of building the dam will exceed the projected costs due to gravel and coal seams. The number of visitor days is questionable and their value to the economy. Twenty-five thousand visitor days is way more than will use the dam based on past visits to Fort Peck. The estimated value of those visitor days at \$83 seems extremely high. When all the costs are added up the dam will not return enough to the economy to cover the operational costs let alone any return on the investment in the dam. The figures in the plan were used to make the dam look feasible rather than more realistic projections that represent actual use.
19. Cherry Creek dam should not be constructed because \$13 to \$15 million cost is excessive when our national debt is so high, the \$1.5 + million each year to pump water from the Yellowstone River to maintain Cherry Creek dam water level does not make sense, and around the dam, probably back on private ground-unkept buildings and shacks will appear. No sewer - no running water - no electricity - all in a shantytown appearance. Garbage will be everywhere. Area roads and trails will be explored, gates will be left open, livestock will get out. Vandalism and thievery will occur at area farms and ranches.
20. Sufficient water is available from the Yellowstone River for the proposed Cherry Creek dam and should be pumped to help maintain water levels in the proposed reservoir needed to maintain a good fishery and attractive recreational area.
21. Impacts would be significant from the Cherry Creek dam construction, with increased soil erosion, possible contamination from equipment, and a change in water quality from pumping, construction, and flow variations. The severity would depend on the amount of precipitation and the construction stage. Water quality should be closely examined in the Cherry Creek Water Quality Special Project to determine the affect of increased turbidity, flow variations, increased dissolved solids, and presence of fecal coliform caused by livestock.
22. The Cherry Creek reservoir site and riparian areas along Cherry Creek are heavily grazed by livestock and provide little fish and wildlife habitat or recreational use.
23. Construction of the Cherry Creek dam would provide a good reservoir fishery provided suitable game fish species are stocked initially and maintained throughout the project life.
24. A sub-impoundment in the Cherry Creek reservoir should be developed to create a wetland area suitable for waterfowl and other wildlife species and aquatic organisms commonly associated with wetland areas.
25. Suitable recreational-use facilities should be constructed in the Cherry Creek project area.
26. All costs associated with the Cherry Creek’s initial construction and subsequent maintenance and management of fish, wildlife, recreational developments and facilities should be project costs.
27. To satisfy the requirements of Montana Environmental Policy Act, BLM must submit an environmental assessment specifically for the Cherry Creek project, unless BLM is planning a specific environmental impact statement.
28. Smoky Butte deserves protection and should have been considered for area of critical environmental concern designation in your plan.

29. Is the mineral armacolite contained in the shale at Smoky Butte?

Responses

1. Due to public comments and analyses of the impacts, the area open to off-road vehicles (see map 13) and the area transferred to the Montana Department of Fish, Wildlife and Parks have been modified (see map 17).
2. Vandalism could occur no matter where the area is designated. The area designated open would be monitored to minimize the problems listed.
3. See text changes in the “Vegetation” and “Soil” sections of chapter 4 for additional impacts identified from open off-road vehicle use.
4. The preferred decision for the open off-road vehicle areas was made after gathering public input and reviewing impacts from leaving the areas open versus limiting the off-road vehicle use.
5. See response 1 above. Most of section 3 in the open off-road vehicle area near Glendive is a thin, hilly range site that has slopes greater than 5 percent. It is a moderately productive range site producing anywhere from 100 to 1,200 pounds of air-dry herbage, per acre, per year. This is in comparison to a silty range site which is the most common range site in Dawson County and produces 800 to 1,500 pounds of air-dry herbage, per acre, per year. The range in air-dry herbage production is based on the variation in precipitation from year to year and range condition. Off-road vehicle use will increase erosion in the area, above the amount that is natural. A series of sediment dams may be required to limit the soil being eroded off the area. See impacts to wildlife from off-road vehicle use in chapter 4. All of the sections now included have legal access.
6. The 150 animal unit months for the three operators affected by the land transferred for Makoshika State Park would generate \$279 of grazing fee receipts. Of that total, \$140 would be retained by BLM, \$105 would be returned to the Federal Treasury, and \$34 would go to the state government. The loss of 150 animal unit months would require the operators to find alternate feed sources or cut back approximately 12 head of cattle. Either option would likely result in less income. It was determined that the benefits of approving the Recreation and Public Purposes Act application outweighed the loss of revenues.
7. BLM is not proposing off-road vehicle use in Makoshika State Park. Makoshika State Park is managed by another agency, the Montana Department of Fish, Wildlife and Parks. Section 6 in T. 14 N., R. 56 E. has been dropped from the area to be transferred and would be managed with a limited off-road vehicle use designation. Section 6 in T. 16 N., R. 56 E., remains part of the Recreation and Public Purposes Act application, where off-road vehicle use and other management would be controlled by the Montana Department of Fish, Wildlife and Parks.
8. The “Area of Management Concern” was provided to BLM by the Montana Department of Fish, Wildlife and Parks.
9. See response 7 above.
10. Prescriptions for managing mountain bikes were considered but current and projected use did not warrant management attention at this time.
11. Under visual resource management Class II, project development would be severely restricted where the project would be visible from major travel routes. Visual resource management restrictions apply only to public lands.
12. To become a wilderness study area, certain criteria must be met. Visual resource management classifications were based on the professional judgment of the recreation specialist.
13. BLM will acquire, from willing landowners, easements and nonagricultural lands along the Lewis and Clark Trail.
14. No acres within the areas open to off-road vehicle use were identified for revegetation.
15. See text changes and decision for considering the Yellowstone and Missouri rivers (Lewis and Clark Trail) as a special recreation management area.
16. Guidelines for administering commercial guides and outfitters are addressed under “Recreation” in chapter 2.
17. See text and decision changes under “Recreation” in chapter 2, for considering closing the Calypso Trail to motorized traffic.
18. The 1.3 million dollar figure for purchasing water from the Bureau of Reclamation for Cherry Creek is the cost over a 25 year contract. Acquiring this water

CHAPTER 5 Recreation

is only an option, as a recently proposed settlement with the Northern Cheyenne Tribe may eliminate any excess water being available for BLM use from the Bureau of Reclamation. The benefit and cost analysis for Cherry Creek reservoir was prepared using the Economic and Environmental Principals and Guidelines for Water and Related Land Resource Implementation Studies adopted by the Water Resource Council. The derivation of the estimated benefits and costs are included in the "Cherry Creek" section of the Socioeconomics appendix, as is the derivation of the estimated visitor days and the net economic values.

19. Pumping the water for Cherry Creek dam is necessary to sustain a fishery. The facilities will be maintained. BLM cannot control actions taken on private land.
20. See response 18 above.
21. Construction of the Cherry Creek dam may temporarily increase soil erosion. The potential for contamination from equipment exists as does a potential for water quality degradation. During construction, efforts will be made to limit the amount of soil erosion by wind and water. Contamination from onsite equipment should not be a problem. Water quality is being monitored, and will continue to be monitored after the dam is in place. The greatest effect on water quality is from natural agents. The headwaters of the basin contain areas which have high rates of geologic erosion, greater than will be produced from construction. An effort has been undertaken to reduce the natural erosion in the watershed to a minimum and to trap sediments and salts before they reach the future site of the dam.
22. The Cherry Creek dam site had been heavily grazed. This has not been the case since 1992. Steps are being taken to improve the riparian area. This allotment has been designated an "I" category allotment.
23. Trout would be initially stocked in the Cherry Creek dam and then warmwater species such as northern and large-mouth bass. It would be a self-sustaining fishery.
24. A sub-impoundment and a fully equipped campground will be addressed during the design phase.
25. See response 24 above.
26. The resource management plan makes the decision to designate the Cherry Creek Special Recreation Man-

agement Area. BLM will do a separate environmental impact statement analyzing the construction of the Cherry Creek dam if funding is available through a supplemental appropriation from Congress. Costs for constructing the dam would also require a supplemental appropriation from Congress. If the dam is not constructed, Cherry Creek will not be managed as a special recreation management area.

27. See response 26 above.
28. Smoky Butte has been considered for area of critical environmental concern designation in the final resource management plan/environmental impact statement.
29. The mineral armalcolite is contained in the basaltic rock at Smoky Butte.

Preferences and Opinions

1. Hunting, fishing, bird watching, photography, camping and other public recreational activities are important on the BLM lands proposed for oil and gas development.
2. Agriculture will be replaced by tourism and recreation in the future.
3. Opposed to the preferred plan for recreation as it would have a negative impact on bordering ranches.
4. Need camping and picnic areas.
5. Emphasize the sensitive environment and recreational potential of the region to widen the economic base.
6. Support designation of Smoky Butte as an area of critical environmental concern (2).
7. Prevent overuse along the river corridors.
8. Powder River Depot and Calypso should be removed from grazing, construction of rights-of-way, off-road vehicle travel, mineral material sales and oil and gas leasing.
9. Powder River Depot, Cherry Creek and Calypso should be developed by private interests and the Montana Department of Fish, Wildlife and Parks; not BLM.
10. Visual resource management Class II areas should be changed to Class III or IV.

11. There's too much visual resource management II and III, restricting developments.
12. Advocate eliminating visual resource management from the resource management plan.
13. Opposed to constructing the Cherry Creek dam (2).
14. Opposed to the open off-road vehicle use area near Glendive (2).
15. Support preferred plan for off-road vehicle use (3).
16. Support open off-road vehicle use (Alternative A).
17. Opposed to any open off-road vehicle use (5).
18. An alternative to the Glendive "open" off-road vehicle area should be the large block of land around Cedar Creek south of Glendive (3).
19. In limited and open off-road vehicle areas, cooperation with the permittee must be stressed for general policing and management.
20. Off-road vehicles and livestock do not mix.
21. Limit off-road vehicle use during hunting season only.
22. BLM land in section 6, bordering Makoshika State Park, should not be opened up for use of off-road vehicles (2).
23. Support open off-road vehicle use in T. 14 N., R. 55 E., Sec. 21: E1/2.
24. Leave section 6 open to off-road vehicle use.
25. Less motorized traffic and more wilderness.
26. More conservation and nonmotorized recreation.
27. Opposed to Cherry Creek Water Quality Special Project.

SOIL, WATER, AND AIR QUALITY

Substantive Comments

1. The conclusion that air quality over the long term would not be affected as dissipation would mitigate the impacts is not substantiated by any supporting

evidence. Air pollution from a coal-fired power plant is long term. An individual oil well can be a major source of air pollution. Any new oil and gas or other energy development and use in the vicinity of Theodore Roosevelt National Park and Lostwood National Wildlife Refuge, (the Class I sulfur dioxide increment [air quality standard] for those areas has already been exceeded), may lead to adverse impacts on their air quality related values. The resource management plan should state that mitigating measures may reduce, but not eliminate air quality impacts, and it should conclude that potential energy developments could have a long term as well as short-term adverse air quality impact on the nearby Class I areas.

2. Describe plans for mitigating the impacts of air pollution to address conformity requirements of the Clean Air Act, with a full analysis of existing and potential visibility impact to Class I lands, and analysis of the impacts of prescribed burning upon Class I areas. Air quality monitoring, screening analyses, and the modeling used in BLM's analyses should be described. Air quality impacts of significant activities will need to be analyzed to ensure that air quality criteria are met.
3. The Soil and Water appendix identifies critical watersheds needing continued or improved management and monitoring. It is not clear how the selections were made. Many other watersheds in the area covered by the resource management plan are listed as impaired by the Montana Water Quality Bureau and have similar resource values and needs. The Montana Water Quality Bureau's water quality assessment (305[b] report) has identified streams in the Big Dry Resource Area that have water quality problems and impaired support of beneficial uses. The Environmental Protection Agency asks BLM to direct and focus BLM resources and management activities to address the water quality problems.
4. The document states that proposed well pads can be required to be moved only up to 200 meters to avoid wetlands and riparian zones. This statement needs to be modified to reflect concerns relevant to section 404 of the Clean Water Act. Methods which prevent the discharge of hazardous materials and waste products should be outlined that declare that these actions are prohibited.
5. The BLM needs to be concerned that BLM land is washing downriver, losing acres that BLM is currently administering.

CHAPTER 5

Soil, Water, and Air Quality

6. The statement in chapter 2, “Soil and Water,” Management Common regarding water quality standards should be revised to state BLM activities will follow the Montana Water Quality Standards.
7. The “Soil and Water” section of chapter 2 includes general goal statements. Specific BLM management direction that will accomplish these goals should be identified and described in the Final Resource Management Plan and Environmental Impact Statement. What practices will BLM use, particularly livestock grazing, to protect and improve watershed and riparian areas? What are the monitoring and evaluation standards for grazing? What are the livestock utilization standards for vegetation?
8. Describe the BLM management direction that will be taken to reverse the downward trends shown in table 54 “Status of Existing Allotment Management Plans”.
9. The Monitoring appendix indicates very little water quality monitoring, stream channel and stream bank integrity assessment will be carried out. How will BLM fulfill Montana Water Quality standards from the level of monitoring indicated? The general statements in chapter 4 that water quality impacts “would be minimal” cannot be verified or supported without adequate monitoring.
10. The threat of groundwater contamination from oil and gas development has not been adequately presented. Specifically the threat from improper casing and cementing of production and disposal wells is not adequately described.
11. Section 404 of the Clean Water Act requires that a permit or permits be obtained from the Corps of Engineers when construction involves wetlands and waters of the United States. For example, easily obtainable nationwide permits may be required for construction of road crossings while individual permits would be necessary when known significant impacts will occur.
3. Critical watershed determinations were based on a number of factors including amount of public land in the watershed, BLM activities affecting the watershed, operator cooperation, regional or community interest, amount of finances required, and whether or not the watershed could be improved; these are the priority areas. BLM will try to improve other areas as time and funding allows. BLM reviewed report 305(b). In most cases, BLM had no jurisdiction over any of the lands containing the streams mentioned (see Soil and Water appendix for text changes).
4. The stipulation for riparian and hydrology areas states that oil and gas surface occupancy and use is prohibited within riparian areas, 100-year floodplains of major rivers, and on water bodies and streams. Well pad locations and other disturbances can be moved up to 200 meters without additional justification. The site can be moved farther than 200 meters with justification from the area manager. With the no surface occupancy stipulation in these areas and the ability to move the site, Section 404 of the Clean Water Act would not come into force in almost all instances. If the activities would still come under Section 404, the U.S. Army Corps of Engineers would have to review the activity and issue a permit. If a 404 permit had not been issued by the Army Corps of Engineers, the BLM would discontinue processing the application.
5. Erosion along the rivers is a natural process of the river system. The BLM is concerned about erosion that is above the natural geologic erosion. Management practices will continue to be used to limit erosion that is caused by BLM’s activities.
6. See text changes in chapter 2 referencing Montana Water Quality Standards.

Responses

1. See text changes pertaining to impacts on air quality under “Air Quality” in chapter 4.
2. There are no prescribed burns proposed near Class I areas. Air monitoring is described in the Monitoring appendix. Air quality impacts have already been analyzed for areas mentioned specifically in this document, such as the Powder River Depot and will not require reanalysis for implementation. Those areas that are not site-specific such as a potential coal mine will require further analyses in future planning documents.
7. The BLM will use the Montana Best Management Practices as guidelines for grazing in riparian/wetland areas. These draft practices were included in the “Vegetation” section of chapter 2. See text changes. Guidance for utilization levels of browse is also found under “Vegetation” in chapter 2. The monitoring standards are located in the Monitoring appendix.
8. Management of allotments in downward trends is discussed under “Allotment Categorization” in the Livestock appendix.

9. As stated in the “Soil and Water” section of the Monitoring appendix, BLM will monitor 10 to 15 times per year, which will meet Montana water quality standards. To our knowledge, the impacts are minimal.
10. For water quality impacts from oil and gas development, see the “Soil and Water” section in chapter 4.
11. BLM will obtain Section 404 permits as required by the Clean Water Act.

VEGETATION

Substantive Comments

1. Acreage indicated as being in fair condition is not accurate for allotment 1288 (950 acres). These acres should be classified as being in better than fair condition in 1993. In the late 1970s and 1980s when someone was through this area, why wasn't anyone notified? Practices to correct the problem could have been taken.
2. Montana Department of Fish, Wildlife and Parks does not know anything about weed control nor have they implemented an acceptable grazing program in Makoshika State Park. There is spotted knapweed and leafy spurge just getting started within the Park boundaries and is well established on both the north and south sides at this time. Most of the land swap sections have leafy spurge well established.
3. The noxious weed program must not be held up because of sagebrush.
4. BLM has excluded from the planning area, the land bordering Fort Peck waters in McCone County. This is the biggest potential threat for noxious weed infestation spreading to private land; request that this be reconsidered. Would like to meet with BLM to formulate a safe means to control the spread of noxious weeds from the Corps of Engineers, U. S. Fish and Wildlife Service and BLM lands in McCone county.
5. Federal land managers should eliminate noxious weeds on federal ground - especially leafy spurge and spotted knapweed. There should be no acceptable level of noxious weeds and the Plan should be designed to work toward zero level.
6. If hay is cut on BLM, the number of cattle run in that pasture are supposed to be reduced. Sign up is in January to let BLM know how many cattle are to be run for that year. How in January can it be known if there will be hay to cut in June and reduce the numbers accordingly?
7. Would like to see the appendixes of this management plan contain a paragraph or paragraphs as appropriate, describing how each activity type or need would generally affect wetlands and/or waters of the United States. In addition, what specific measures will be utilized to avoid, minimize or mitigate use related impacts or potential impacts? Immediate and secondary impacts as well as cumulative impacts should be considered in the evaluations.
8. In order to maintain any involvement or changes with the land (not minerals), consideration should be made for the art of range science that includes the entire ecosystem; vegetation is the basis for all of BLM surface activities.
9. Wildings should not be sold commercially. This is not addressed.
10. When doing seeding, it should be mixed (seed), rather than just native (get rid of crested wheat).
11. Mechanical treatment areas will be rested for two years. With the appropriate rainfall, one is only needed.
12. The Vegetation appendix includes the climax theory. The quote states “...absence of disturbance such as fire, grazing, or plowing.” Plowing should not be included. That needs to be changed or addressed.
13. The plan assumes that where prairie dog resources are present and where there are impacts to soil and vegetative resources that prairie dogs are the cause of the problem and should be controlled. Are there documented prairie dog induced soil or vegetative resource problems in any areas in the absence of cattle? Data should be gathered.

Responses

1. See table 52 for corrected figure for allotment 1288. A discussion on vegetation condition is found in the Vegetation appendix. Inventories conducted in 1979 and 1980 used the soil vegetation and inventory method which did require on the ground sampling. The helicopter was the mode of transportation. Methodology for the inventory and the results of the inventory were made available to the public in the Big Dry Environmental Impact Statement Vegetation Allocation (USDI, BLM 1982b).

CHAPTER 5 Vegetation

2. The BLM has not received sufficient funding to adequately control noxious weeds on public land. Not controlling noxious weeds, whether by this agency or others is a negative impact to the vegetation resource resulting in a negative impact on other resources. The primary discussion on noxious weeds is found in the "Vegetation" section of chapter 2.
3. At times the BLM may specify the type of herbicide, rates, or application methods to protect various non-target species.
4. The Charles M. Russell National Wildlife Refuge is excluded from the planning area because those lands are not managed by the BLM. Prioritization for weed control within the county should be reviewed annually with the county weed board, the Charles M. Russell National Wildlife Refuge Manager and the BLM.
5. See response 2 above.
6. See the "Vegetation" section in chapter 2 for changed text in regard to haying.
7. Riparian areas include wetlands. References to management prescription mitigations are under "Vegetation," "Fire," "Forestry," and other sections in chapter 2. Impacts to riparian areas are discussed under "Vegetation" in chapter 4.
8. Vegetation impacts and management is discussed in chapters 2 and 4. The concept of ecosystem management is in developmental stages. Range science will play a major role.
9. Regardless of whether a request for harvest of wildings is for private or commercial use, proposals that would cause significant impacts would be rejected. When approved, fair market value would be charged.
10. Seeding of native species is preferred in most cases although seeding of introduced species such as crested wheatgrass may be authorized. These seedings will include forbs such as clover for wildlife benefit.
11. Some areas mechanically treated may recover within one year given adequate precipitation; however, this is the exception rather than the rule. Most areas that are mechanically treated are in poor or fair range condition and plants have low vigor. Following the mechanical disturbance, these plants need sufficient recovery time. Grazing too soon could result in conditions worse than pretreatment conditions. Soil Conservation Service standards call for two years of rest. The BLM has defined the growing or rest period as April through September. In this way, an operator is not totally prevented from using the treated area.
12. Plowing is included in the climax theory as it is a disturbance that affects plant species composition and therefore seral status. Although the BLM does not normally allow plowing on public land, some BLM lands were farmed during the homestead days and this continues to affect plant species' composition.
13. Anytime that the soil is exposed, whether by prairie dogs or other agents, there is a potential for increased soil erosion. The grasslands within the Big Dry Resource Area would be included in the mixed grass prairie ecosystem. Based on the Soil Conservation Service Technical Guide for range site description, the range sites where prairie dogs are commonly found in this area should have 75 to 85 percent midgrasses, 5 to 15 percent short grasses, 5 percent forbs, and 5 to 10 percent shrubs. Shortgrasses and weedy forbs commonly increase and midgrasses decrease due to continuous overgrazing in prairie dog towns. One study in a mixed grass prairie in South Dakota with bison and prairie dogs showed that when prairie dogs were removed, available grass material remaining on the site at the end of the year increased by 36 to 43 percent. Similar results were obtained when bison were removed and prairie dogs remained. The increase in available grass doubled when both prairie dogs and bison were removed (Cid et al. 1991). Available grass decreases and vegetation condition declines following prairie dog colonization (Koford 1958, Bonham and Lerwick 1976, Delsted et al. 1981, Coppock et al. 1983, Archer et al. 1987). In the absence of prairie dogs, vegetation can be managed for additional livestock forage and allow for increased grass material remaining at the end of the year. Contact the Rocky Mountain Forest and Range Experiment Station in Rapid City, South Dakota for further studies.

Preferences and Opinions

1. The plan gives attention to riparian areas.
2. BLM should maintain the land in Makoshika State Park as is and let the Montana Department of Fish, Wildlife and Parks figure out how to maintain an acceptable grazing and weed program on 10 to 12 acres of public fishing access sites, and islands that they already own and control, rather than try to mismanage a few thousand acres.

WILD AND SCENIC RIVERS

Substantive Comments

1. Why wasn't the segment of the Yellowstone River flowing through the Fort Keogh Agricultural Experiment Station considered for Wild and Scenic River status? The land is in the hands of federal agencies on both sides along with some islands. There is nearly 10 miles of good river front ("riparian"). Could the research areas be protected by fencing and signs?
2. The BLM plan fails in providing adequate protection for a 100-mile free flowing stretch of the Missouri River below Fort Peck Dam and a 200-mile stretch of the Yellowstone River.

Responses

1. The segment of the Yellowstone River flowing through the Fort Keogh Livestock and Range Research Station was not considered for fencing, signing, or Wild and Scenic River status because BLM has no authority over these lands.
2. The Yellowstone and Missouri rivers (Lewis and Clark Trail) were considered in the final resource management plan/environmental impact statement for special management. See changes in text in "Recreation" chapter 2.

Preferences and Opinions

1. Designate the 96 streams as National Wild and Scenic rivers.

WILDERNESS

Substantive Comments

1. Designating Seven Blackfoot as a wilderness area would cause local taxpaying ranchers to lose existing animal unit months and could result in lower livestock numbers, thereby causing a loss of taxable valuation to Garfield County.
2. The resource management plan recommends a Seven Blackfoot wilderness of 5,790 acres, but there is good wilderness potential to the south. If there are private inholdings and a state section, then why not pursue these as land exchanges. Road closures are possible too.

3. The proposed Terry Badlands wilderness area north-east of the Calypso Trail meets the criteria for wilderness, the rest of the Terry Badlands does not.
4. BLM's evaluation of the Coal Creek area for wilderness consideration was biased, and shows an insensitivity to prairie areas which are rare within the National Wilderness Preservation System. Coal Creek would be an excellent representative of the severely underrepresented mixed-grass prairie ecosystem. The BLM needs to reconsider its recommendation and open the process to public input. The decision not to recommend the area had absolutely no public review.
5. Calypso Trail should be closed to motorized vehicles. This Trail crosses the Terry Badlands proposed wilderness and seriously compromises the integrity of the wilderness, and resource management plan should have addressed this concern. The Terry Badlands Wilderness area should be off limits to motorized use. Calypso Trail should be a wilderness area.
6. The Terry Badlands, Ash Creek, and Coal Creek areas need to be protected from off-road vehicle degradation and made wilderness areas.

Responses

1. In accordance with the Federal Land Policy and Management Act of 1976, Section 603, the BLM has already reviewed the planning area for those roadless areas of 5,000 acres more for wilderness characteristics. It is not intended that this resource management plan evaluate or make further recommendations on those areas for wilderness (see the "Planning Criteria" section in chapter 1). This process was concluded in September 1991. Comments from the public were gathered before the wilderness study environmental impact statements were finalized. BLM's recommendations were forwarded to Congress by former President Bush in January 1993. Wilderness recommendations were included to make the resource management plan as complete a document as possible.
2. See response 1 above.
3. See response 1 above.
4. After wilderness study environmental impact statements were completed, a land exchange occurred in the Coal Creek area (see "Wilderness" under the "Alternatives Considered But Not Analyzed in Detail" section in chapter 2) that resulted in 5,000 acres

or greater public lands that had not been evaluated for wilderness study; the area is evaluated in the resource management plan and environmental impact statement.

Before an area can be considered for wilderness study, it must first be evaluated on whether it meets the criteria for study. The wilderness study evaluation conducted on Coal Creek noted the following: the area has an access trail (easement) from the county road to the west side of the unit as a result of the land exchange. Permanent improvements include fences, and other range improvements. Vegetation consists of juniper/pine, grasses, shrubs, and sage. The area was not recommended for further wilderness consideration because it did not meet the evaluation criteria for outstanding opportunity for solitude or a primitive recreation experience or unique supplemental values. The area is open and the visitor could view a county road, power lines, or buildings, and therefore would not be provided solitude or a primitive experience. No supplemental values such as unusual geologic, scenic, wildlife, vegetation, or recreation values were noted during the field inventory phase.

The public had the opportunity to comment on BLM's recommendation that the Coal Creek area is unsuitable for wilderness study during the comment period for the Draft Big Dry Resource Management Plan and Environmental Impact Statement.

5. Off-road vehicle use is not allowed in the wilderness study areas within the planning area. Also see text changes in the "Recreation" section in chapter 2 for considering closing the Calypso Trail, and response 1 above.
6. See responses 1, 4 and 5 above.

Preferences and Opinions

1. Opposed to Seven Blackfoot becoming a wilderness area.
2. Manage the Big Dry Resource Area as a National Natural Preserve.
3. Eliminate oil and gas and mining activities.
4. The Terry Badlands should become a wilderness area.
5. Opposed to any wilderness in eastern Montana.

6. Wild and scenic, wilderness, or critical habitat acreage should equal development acreage.

WILDLIFE

Substantive Comments

1. The U.S. Fish and Wildlife Service supports BLM's effort to identify and manage habitat for potential black-footed ferret reintroduction. However, identifying an area of critical environmental concern for black-footed ferret reintroduction within the planning area prior to development of a reintroduction and management plan is probably not necessary and could be counter-productive to potential black-footed ferret reintroductions in the future. The viability of the prairie dog complex in the planning area for a possible ferret reintroduction is unknown at this time. U.S. Fish and Wildlife Service guidelines state that any site of 1,000 acres of prairie dogs or more should be evaluated for a possible black-footed ferret reintroduction. Since reintroduction evaluation and/or planning has not been completed, the resource management plan should not refer to this complex as a black-footed ferret reintroduction site. We recommend the BLM concentrate on actively managing and enhancing prairie dog resources on public lands in this area as well as the surrounding public lands. If these efforts are successful, habitat for many wildlife species and habitat capable of supporting a future black-footed ferret reintroduction would be available.
2. The resource management plan should clearly acknowledge the BLM's commitment to work with the Montana Black-footed Ferret Work Group on site evaluation as well as other aspects of possible ferret recovery in the future. This commitment should also include acknowledging that prior to any black-footed ferret reintroduction, a site-specific management plan will be required. This plan will be prepared in cooperation with all affected landowners and permittees.
3. The black-footed ferret reintroduction does not meet the criteria. The area has too much private land and without a cooperative effort between the BLM and the adjoining landowners it would be difficult to manage as an endangered species reintroduction area.
4. Protecting only the small isolated prairie dog towns within the black-footed ferret reintroduction area without looking at management of the entire reintroduction area does not protect the black-footed ferrets

- migration routes between towns. BLM should use the original boundary outlined rather than using the replacement map.
5. Regarding possible black-footed ferret reintroduction, would advocate the designation of the population (if and when the time comes) as nonessential experimental, and stress the importance of including the private landowners in any possible reintroduction. An example to follow would be the effort taking place in south Phillips County.
 6. Long-term black-footed ferret recovery in Montana will probably be contingent on maintaining and enhancing habitats for black-footed ferrets at some time in the future.
 7. Private property rights should be considered and respected even with the black-footed ferret.
 8. The prairie dog management plan does not contain any enhancement features even though the plan acknowledges that prairie dogs have never reoccupied all of the areas in the Miles City District where they occurred prior to intensive poisoning programs. The Miles City District Black-tailed Prairie Dog Management Plan and/or the draft resource management plan should be revised following guidance contained in Montana Prairie Dog Management Guidelines, May 1988. Opportunities to use public lands to offset losses of prairie dog habitats occurring on adjoining private lands should be considered. Efforts to actively manage prairie dog habitats in other areas, which have been impacted by a sylvatic plague epizootic, are being initiated. The resource management plan should address strategies the BLM will use to address this difficult management problem. Strategies and opportunities to reestablish or enhance prairie dog colonies within the planning area on public lands where they occurred historically should be developed.
 9. A level of prairie dog acreage should be established. Any expansion over this acreage must be controlled. If prairie dog expansion occurs, mitigation measures should occur (range improvements) which would allow existing livestock animal unit months to be maintained.
 10. The management of the prairie dogs necessary for the black-footed ferrets would have a negative impact on range management and improvement for livestock and other wildlife.
 11. It is important to recognize shooting prairie dogs as a legitimate recreational activity which does not adversely impact a renewable resource.
 12. Prairie dog resources in the planning area should be inventoried so data on long-term trends of prairie dog populations will be available. Recommend mapping at approximately 5-year intervals. The resource management plan should commit BLM to a program to evaluate the location, size, and status of all prairie dogs complexes of 1,000 acres or more in the planning area at 5-year intervals.
 13. The black-footed ferret will not become an endangered species if it is not reintroduced on federal lands.
 14. The Miles City District Black-tailed Prairie Dog Management Plan should be added as an appendix to the final resource management plan.
 15. The wildlife that grazes or lives on federal land also graze and live on private land, therefore early spring grazing would not have that much effect on the habitat on federal land. Big game animals do not have to compete with livestock for forage in crucial winter range, as the rancher is feeding livestock and the big game animals that are nearby as well.
 16. BLM did not address predator control in this environmental impact statement.
 17. The Draft Big Dry Resource Management Plan and Environmental Impact Statement does not discuss bison, wolf, grizzly bear, or swift fox reintroductions.
 18. The "Species of Special Interest or Concern" (table 37) in the "Wildlife" section of chapter 3 briefly lists a number of sensitive species but no special interest is shown in the document nor is any special concern shown for them in the alternatives.
 19. Sensitive animal species which may exist in the area and which appear to be overlooked entirely are the least weasel, long-legged bat, masked shrew, northern three-toed woodpecker, vesper sparrow, blue sucker, finescale dace, shortnose gar, cheek chub, and endangered invertebrate species (various). The planning area constitutes habitat or potential habitat for an enormous number of species, and full study and consideration of these species would result in additional alternatives being considered.
 20. In table 36, "Fisheries Reservoirs," in "Wildlife" section of chapter 3, not all of these reservoirs sup-

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port fish and some do not support the species indicated. Correct information is found in the “1993 Fishing Pond Booklet for Southeastern Montana” which is available at the Region Seven Headquarters.

21. The social impact assessment in the Socioeconomics appendix does not consider alternatives to preserving the agricultural way of life. Since the outflow of population is so readily known and graphically depicted, why not recognize the Popper’s “Buffalo Commons” proposal as a distinct alternative to an outmoded, albeit romantic, way of life?
22. The BLM lists least tern nests as not needing protection. Identifying one or more gravel islands in the Yellowstone River as areas of critical environmental concern for possible tern nesting is not warranted at this time, but BLM will monitor. If the least tern takes up residence then BLM can manage the islands accordingly. By manage, all BLM needs to do is post some signs and hope the people and their dogs will leave the least terns alone. Any objections?
23. Wildlife do winter in those areas BLM has identified as “crucial”, but those areas are not crucial.
24. There are no studies indicating that excluding livestock in special recreation management areas would be positive to wildlife.

Responses

1. After considering comments from the U.S. Fish and Wildlife Service, Montana Black-footed Ferret Work Group and many others, BLM will be proactive and designate the area as a black-footed ferret reintroduction area. This area has not been deemed suitable for black-footed ferret reintroduction, but does meet the 1,000 acre criterion for reintroduction. These prairie dog towns would be managed for prairie dogs, potential black-footed ferret reintroduction, associated species and recreational shooting. See “Management Common to All Alternatives” section under “Wildlife” in chapter 2.
2. See change in text in the “Wildlife” section of chapter 2.
3. The public prairie dog colonies on Custer Creek meet the minimum criteria of a prairie dog complex, at least 1,000 acres in size. There is no private land within the Black-footed Ferret Area of Critical Environmental Concern.
4. See discussion in chapter 2, “Alternatives Considered But Not Analyzed in Detail” under “Wildlife”.
5. “Nonessential experimental” would be considered if and when the ferret is reintroduced and would be a part of the reintroduction plan. Should the decision be made to reintroduce ferrets, private landowners would be an integral part of the effort.
6. See chapter 2, “Wildlife” for prairie dog habitat discussion.
7. BLM has decided to manage the area as an area of critical environmental concern, until the decision has been made to reintroduce or not reintroduce the black-footed ferret. BLM is committed to working with private landowners if the decision is to reintroduce ferrets.
8. Management actions for prairie dogs are under “Management Common To All Alternatives” in the “Wildlife” section in chapter 2.
9. Prairie dog towns are desirable not only for potential black-footed ferret reintroduction but for the large number of wildlife species that are dependent on this habitat. Control of prairie dogs on public lands is subject to the Miles City District Black-tailed Prairie Dog Management Plan (see Wildlife appendix). No cap is placed on the number of acres of prairie dogs on public lands, because prairie dog numbers are well below where they were in recent years. This is due primarily to periodic outbreaks of sylvatic plague. Restrictions on control of prairie dogs would allow for continued reduction in available forage and limit improvement of ecological status.
10. See response 9 above.
11. Shooting may need to be managed on prairie dog towns, but no proposal has been made to eliminate recreational shooting.
12. The BLM will commit to sampling prairie dog complexes of 1,000 acres or more, every 5 years.
13. The black-footed ferret is currently federally endangered and reintroduction will only serve to possibly remove this species from the endangered list.
14. The Miles City District Black-tailed Prairie Dog Management Plan has been added to the Wildlife appendix.
15. Grazing of livestock on winter ranges can impact wintering wildlife (see the “Wildlife” section in chapter 4).

16. Predator control is discussed in another document “Environmental Assessment for Predator Management in Montana” (USDI, BLM 1993).
17. In regard to any introduction or reintroduction of wildlife, Montana Department of Fish, Wildlife and Parks has the lead. BLM can and does make lands available. However, the Montana Department of Fish, Wildlife and Parks has not approached the BLM in regard to the bison, wolf, grizzly bear, or swift fox reintroductions.
18. Species listed under “Species of Special Interest or Concern” are described in the “Wildlife” section in chapter 2, under “Management Common to All Alternatives”. For example, wildlife objectives are incorporated into BLM’s plans to meet wildlife habitat goals.
19. In consultation with the Montana Department of Fish, Wildlife and Parks, none of the bird or mammal species in the following list are Species of Special Interest in Montana. Information is limited for some. Least weasel: there is not much data available on distribution due to the little effort being spent looking for them. Montana Department of Fish, Wildlife and Parks suspects this weasel is in fact quite common within the planning area. Long-legged bat: there is no data. Masked shrew: one of the most common shrews; abundant. Northern three-toed woodpecker: This species is found in coniferous forest and is often associated with burned timber. Although Skaar’s book does not list this bird as a possible resident of eastern Montana, it is conceivable they could be found in the Missouri River Breaks. Yellowstone National Park contains the closest known habitat for these birds. Vesper sparrow: this bird is common and widespread throughout eastern Montana. The blue sucker was addressed in the resource management plan (see the “Wildlife” section in chapter 4) in relation to the construction of the Cherry Creek dam. This is the only BLM action which could affect this species. The cheek chub is abundant within the planning area. The finescale dace is not found in Montana; the hybrids (N. redbelly dace and finescale dace) are found in the Missouri River drainage. This fish of special concern in Montana is not expected to be impacted by any BLM decisions. The shortnose gar is found in the Missouri River below the Fort Peck Dam. It is a Species of Special Concern in Montana. The BLM’s management actions are not expected to impact this species. The BLM has no data on invertebrate species or their habitats.
20. See text changes in table 36.
21. See “Alternatives Considered But Not Analyzed In Detail” in chapter 2, pertaining to the “Big Open”. This discussion would also generally apply to “Buffalo Commons.”
22. Current habitat for the least tern on the Yellowstone River is comprised solely of graveled islands. The large majority of these islands are unsurveyed and are the jurisdiction of the state. At this time, there are no BLM islands considered suitable for least terns. BLM does manage graveled shoreline. Currently the least terns are not found using this habitat in the planning area.
23. Wildlife crucial winter ranges were designated as being crucial, but not critical to wildlife.
24. Studies, such as “Effects of Livestock Grazing on Neotropical Migratory Landbirds in Western North America” (Bock et al. n.d.) present findings on how wildlife habitat improves for some species in the absence of livestock. Additional studies may be reviewed upon request at the Big Dry Resource Area office.

Preferences and Opinions

1. Prairie dogs should be eliminated.
2. Support maintaining prairie dog acreages and allowing for natural prairie dog expansion on appropriate public lands.
3. Support position that existing animal unit months will not be reduced for prairie dog expansion.
4. Support black-footed ferret reintroduction.
5. Support designation of the Black-footed Ferret Area of Critical Environmental Concern, but do not allow locatable mineral mining.
6. Do not hold up the economy for the black-footed ferret by protecting prairie dog towns.
7. Opposed to the reintroduction of the black-footed ferrets in the planning area.
8. Do not introduce the black-footed ferret because of the Endangered Species Act.
9. It is ironic that BLM which has an American bison symbol writes a document that totally ignores the bison.

CHAPTER 5
Wildlife

10. The plan leaves nothing for wildlife and public use.
11. There is too much crucial winter range.
12. Opposed to the present policy prohibiting predator control on public lands.
13. Favor the increase in providing enhancements for wildlife.
14. Support development of new small fishing reservoirs.

**RESPONDENTS AND TOPICS
ADDRESSED**

The following list of individuals, businesses, or organizations have commented on the draft resource management plan and environmental impact statement and on the two newly proposed areas of critical environmental concern. The topics that each individual, business, or organization addressed are also listed. In some letters the name was illegible, and in some meetings the speaker was not identified.

Adamson, Julie	Oil and Gas, Wildlife, Recreation, Paleontology, Wilderness
Advocacy Unlimited Foundation	Oil and Gas, Paleontology, Other, Recreation, Wildlife
Andrews, Scott	Oil and Gas, Recreation
ARCO Oil and Gas Company	Oil and Gas
Arsian, Norman P. and Dunuac, Judy	Oil and Gas, Recreation, Paleontology, Wildlife, Wilderness
Billing, May	Recreation
BLM Advisory Council, Miles City District	Recreation
Bordenkircher, Dave	Oil and Gas, Lands, Other
Brittsan, Joe	Recreation, Paleontology, Oil and Gas, Wilderness
Carter County	Lands
Chamberlin, Lyle	Other
Charlottesville Wellness Center	Recreation, Wilderness, Oil and Gas, Paleontology
Citizens for Freedom	Extension Request
City of Baker	Lands
City of Bowman, N. D.	Lands
City of Scranton, N. D.	Lands
Close, Caroline S.	Oil and Gas, Wildlife, Paleontology
Coburn, Jason	Wildlife
Connecting Point For Public Lands	Oil and Gas, Recreation
Copple MD, Nathan	Recreation, Paleontology, Wildlife, Wilderness, Recreation, Oil and Gas
Department of the Army, Corps of Engineers	Soil, Water, Air, Vegetation
Dansereau III, Richard C.	Oil and Gas, Recreation, Paleontology, Wildlife, Wilderness
Danzeisen, Cathy	Oil and Gas, Paleontology, Wilderness, Recreation
Dawson County Arts Unlimited	Recreation
Dawson County Conservation District	Lands, Recreation
Dawson County Farm Bureau	Recreation, Lands
Dawson County Weed Board	Lands, Vegetation
Dawson Resource Council	Lands, Recreation, Alternatives
Defenders of Wildlife	Extension Request
Dennett, Kerry	Oil and Gas, Recreation, Paleontology, Wildlife, Wilderness
DEUCE	Oil and Gas
DiChiara, Tim	Other, Oil and Gas, Recreation, Paleontology, Wildlife, Wilderness
Durbin, Jean	Oil and Gas, Recreation, Wilderness, Wildlife, Paleontology
Elder, Jim	Oil and Gas, Wildlife, Wilderness
Elliott, Burton	Oil and Gas, Recreation, Paleontology, Wilderness, Wildlife
Fallon County	Lands
Fallon County Stockgrowers and Landowners Association	Lands
Feldman, Cliff	Recreation, Wildlife, Wilderness
Fell, David	Recreation, Oil and Gas, Wilderness

Ford, Fannie Lee	Recreation, Other, Wildlife, Paleontology, Wilderness
Freese, Bill	Oil and Gas, Recreation, Paleontology, Wildlife, Wilderness
Friends of Makoshika	Recreation
Fries, John P.	Recreation, Paleontology, Wildlife, Wilderness, Oil and Gas
Garfield County Commissioners	Lands, Mineral Materials, Wildlife, Wilderness
Gibson, Sarah L.	Recreation
Girdler, Barbara K.	Paleontology, Recreation, Wilderness
Glendive Area Chamber of Commerce and Agriculture	Lands, Recreation
Goodall, Doug	Oil and Gas, Recreation, Paleontology, Wildlife, Wilderness, Recreation
Gravitt, Mary A.	Oil and Gas, Recreation, Paleontology, Wildlife, Wilderness
Great Plains Resources Incorporated	Oil and Gas, Cultural, Wildlife, Alternatives
Groell, Paul T.	Oil and Gas, Recreation, Paleontology, Wildlife, Wilderness
Grue, Clinton, C.	Wildlife, Recreation, Lands
Gunderson, George	Oil and Gas
Haas, John N.	Recreation, Vegetation, Lands, Alternatives, Wildlife
Harris, Dave	Recreation, Wildlife
Harbaugh Ranch Company	Lands
Haughian, Quinn	Wilderness, Wildlife, Other, Livestock
Haughian, Terry	Wildlife
Hayes, Tavia	Paleontology, Recreation, Oil and Gas
Hillhouse Ph.D, Joel and Adler Ph.D, Christine	Oil and Gas, Recreation, Paleontology, Wildlife, Wilderness
Hingtgen, John	Recreation, Wilderness, Wildlife, Vegetation, Other
Hoffman, Roland J.	Recreation, Oil and Gas, Other, Alternatives
Howard, Jennifer	Oil and Gas, Recreation, Wildlife, Wilderness, Paleontology
Hubbell, William S.	Recreation
Huston, Dave	Alternatives, Livestock, Recreation
Irvine, Robert J.	Lands, Livestock, Wildlife
Jennings, David	Recreation, Oil and Gas, Paleontology, Wildlife, Wilderness
Johnson, Gene	Oil and Gas, Recreation, Other, Paleontology, Wilderness, Wildlife, Vegetation, Cultural
Johnson, Norman	Paleontology, Oil and Gas, Recreation, Wildlife, Wilderness
Keith, Alan	Oil and Gas, Recreation, Wilderness, Wildlife, Paleontology
Kellner, Bill	Recreation, Oil and Gas, Wilderness, Paleontology
Keltner, Lawrence and Kim	Wildlife
Kubesh, Nell	Coal
Kuehn, Alyce	Soil, Water
Kuehn, Wayne	Recreation
Laue, Peter	Other, Oil and Gas, Recreation, Paleontology, Wildlife, Wilderness
Levin, Edward W. Jr.	Recreation
Linell, Thomas A.	Oil and Gas, Recreation, Wildlife, Paleontology, Wilderness
Linn, David	Recreation
Lnomas, Natalie	Oil and Gas, Recreation, Paleontology, Wildlife, Wilderness
Lone Pine Ranch Incorporated	Soil, Water, Livestock, Lands
Loughney, R. D.	Recreation
Lynn, John and Tracey	Other, Oil and Gas, Paleontology, Wildlife, Recreation, Wilderness
Mackay, Shelley	Cultural, Extension Request
Madler, Mike	Lands
Mahnke, Robert	Recreation, Wildlife, Oil and Gas, Wilderness
Mainwaring, Scott	Oil and Gas, Recreation, Paleontology, Wildlife, Wilderness
Markeloff, Robert	Recreation, Oil and Gas, Paleontology, Wildlife, Wilderness
McAlpine, Alison	Oil and Gas, Recreation, Wildlife, Wilderness
McBride, John and Candace	Oil and Gas, Recreation, Paleontology, Wildlife, Wilderness
McCall, William A.	Oil and Gas, Recreation, Paleontology, Wildlife, Wilderness

CHAPTER 5

Respondents

McCone County Commissioners	Vegetation, Alternatives, Paleontology
McElderry, Michele A.	Oil and Gas, Wildlife, Paleontology, Recreation
McGraw, Jean	Other, Oil and Gas, Recreation
Meridian Oil	Oil and Gas, Cultural, Wildlife, Alternatives
Mitchell, Terry and Jean	Recreation
Moffett, Irene	Coal, Recreation
Montana Audubon Council	Lands, Wild and Scenic, Wilderness, Recreation, Wildlife, Other, Paleontology, Livestock, Oil and Gas
Montana Department of Agriculture and Montana Board of Livestock	Livestock, Vegetation
Montana Department of Health and Environmental Sciences, Water Quality Bureau	Vegetation, Soil, Water, Livestock
Montana Department of Fish, Wildlife and Parks	Wildlife, Lands, Livestock, Recreation
Montana Department of Natural Resources and Conservation	Recreation
Montana Public Lands Council	Alternatives, Lands, Livestock, Fire, Wildlife, Recreation
Montana State Historic Preservation Office	Alternatives, Cultural
Montana Stockgrowers Association	Recreation, Livestock, Lands
Montana Wildlife Federation	Lands, Recreation, Wildlife, Vegetation
Mueller, Mrs. Catherine K.	Oil and Gas, Recreation, Wildlife, Wilderness, Other
Museum of the Rockies	Recreation
National Wildlife Federation	Extension Request
Navratil, Unmack, & Herring, Attorneys at Law, P.C.	Recreation
Needleman, Art	Oil and Gas, Other, Recreation, Wilderness, Paleontology
Nelson, John and Sharon	Recreation, Wildlife, Oil and Gas, Paleontology, Wilderness
Nemitz, Kenny	Recreation, Lands
Nemitz, Merlin	Lands, Recreation
Norris, Taffie	Oil and Gas, Recreation, Paleontology, Wildlife
Northern Plains Resource Council	Coal, Extension Request
O'Neill, Frank and Dianne	Lands, Vegetation, Livestock, Recreation, Wildlife
Overby, Kirk	Recreation
Pamperin, John	Oil and Gas, Recreation, Paleontology, Wildlife, Wilderness
Pelech, Walter and Dorothy	Recreation, Oil and Gas, Wilderness, Paleontology, Wildlife
Perhman, J	Oil and Gas, Recreation, Wildlife, Wilderness
Phebus, Drury and Iona	Lands
Pinnow, Wanda	Lands
Pollard Ranch Company Partnership	Lands
Porter, Rob	Recreation, Oil and Gas, Wilderness, Wildlife
Public Lands Foundation	Lands
Reichel, Jason E.	Oil and Gas, Recreation, Paleontology, Wildlife, Wilderness
Reukauf, Robert	Recreation, Wildlife
Rich Ranch Company	Lands
Riggs, Beth	Lands, Wilderness, Recreation, Wildlife, Wild and Scenic
Ritchey, Kathie S.	Oil and Gas
Robbins, Jack	Oil and Gas, Recreation, Wildlife, Wilderness, Paleontology
Rocky Mountain Oil and Gas Association	Oil and Gas, Cultural, Wildlife, Alternatives
Roney, Linda	Recreation
Rosche, Olga M.	Recreation, Paleontology, Wildlife, Wilderness, Oil and Gas
Rusley, Truman Gary	Lands, Livestock
Savine, Joseph F.	Oil and Gas, Recreation, Paleontology, Wildlife, Wilderness
Schwartz, Todd	Recreation, Lands
Shell Western E&P Incorporated	Oil and Gas, Wildlife, Alternatives
Shoup, Paul D.	Livestock
Sierra Club, Northern Great Plains Region	Other, Alternatives, Oil and Gas, Wilderness, Paleontology, Wildlife, Recreation, Cultural

Sierra Club, Rocky Mountain Chapter	Recreation, Oil and Gas, Wilderness
Sierra Club, Southern New Mexico Group	Oil and Gas, Recreation, Paleontology, Wildlife
Smith, Jeffrey	Recreation, Oil and Gas, Wildlife, Wilderness
Southeastern Montana Sportsmen Association	Recreation, Lands, Oil and Gas, Alternatives
Sparks, Tom	Other, Livestock, Wildlife, Fire, Lands, Vegetation, Cultural, Coal, Recreation
Stickel, Ervin F.	Vegetation
Stifler, John R.	Oil and Gas, Recreation, Wildlife, Wilderness
Swanson, John R.	Wilderness, Wild and Scenic, Livestock, Recreation, Lands, Wildlife
Taylor, Karen	Livestock
Teague, Jonathan M.	Oil and Gas, Wilderness, Recreation, Paleontology, Wildlife
Texaco Exploration and Production Incorporated	Oil and Gas, Cultural, Wildlife, Other, Alternatives
The Big Open Project	Other, Alternatives, Wildlife, Lands, Recreation
Thomas, Lee	Oil and Gas, Recreation, Wilderness, Wildlife
Thomason, Dan	Cultural
Toulouse, Margaret E.	Recreation, Oil and Gas, Wilderness, Wildlife, Other, Paleontology
Town of Ekalaka	Lands
Town of Wibaux	Lands
Trudell, Dennis	Lands, Vegetation
Trumbo Ranch	Paleontology
U.S. Environmental Protection Agency	Other, Soil, Water, Air, Livestock, Extension Request
USDI, Bureau of Mines	Locatables, Coal
USDI, Fish and Wildlife Service	Wildlife, Livestock, Vegetation
USDI, National Park Service	Air, Cultural, Wildlife
van Doren, Jason	Oil and Gas, Recreation, Wildlife
Warble, Sletten	Oil and Gas, Paleontology, Wilderness, Recreation, Wildlife
Wibaux County Commissioners	Lands
Williston Basin	Oil and Gas, Cultural, Wildlife, Alternatives
Wilson, George T.	Alternatives, Wilderness
Wilson, Mr. and Mrs. Richard C.	Oil and Gas, Recreation, Paleontology, Wildlife, Wilderness
Wilson, Robert	Oil and Gas, Wilderness, Other, Recreation, Wildlife
Wineteer Jr., Stephen A.	Oil and Gas, Recreation, Wildlife
Worldview, Ltd	Oil and Gas, Recreation, Paleontology, Wilderness, Wildlife
Wurr, C. Peter	Other, Oil and Gas, Recreation, Wildlife, Paleontology, Wilderness
Zadis, P. Z.	Oil and Gas, Recreation, Paleontology, Wildlife, Wilderness
Zeller, Ruth W. and Robert A.	Oil and Gas, Paleontology, Wildlife, Wilderness, Recreation
Zimmerman, Duane	Recreation

ADDITIONAL COMMENTS

During the comment period on the draft resource management plan and environmental impact statement, the U.S. Fish and Wildlife Service and the Montana Department of Fish, Wildlife and Parks indicated that a Black-footed Ferret Area of Critical Environmental Concern designation may not be warranted at this time.

With that in mind, BLM requested comments from interested parties (those who commented on the Black-footed Ferret Area of Critical Environmental Concern) who were within a commuting distance. Seven letters were received containing 36 comments. Those substantive comments are listed below with the preferences and opinions following.

Substantive Comments

1. The prairie dog complexes alone warrant area of critical environmental concern designation whether or not reintroduction of black-footed ferrets occurs.
2. BLM should include all of the public land in the area of critical environmental concern as shown on map 22 of page 367 of the draft resource management plan and environmental impact statement rather than the revised map that was sent out at a later date. The first map includes a viable number of complexes and would allow for protection of migration routes between complexes.

CHAPTER 5

Additional Comments

3. The resource management plan and environmental impact statement does nothing to maintain or enhance prairie dog towns for associated species.
4. The resource management plan and environmental impact statement fails to establish prairie dog acreage targets. Until BLM reaches a target, control programs should be minimized and expansion efforts maximized.
5. The resource management plan and environmental impact statement does not disclose present range or distribution of prairie dogs.
6. The final resource management plan and environmental impact statement should identify several other areas for existing or potential prairie dog complexes. Associated species have been depleted because prairie dog complexes have not been maintained.
7. Recommend that BLM inventory and monitor prairie dog towns so it can respond appropriately to decreases or increases in population.
8. The resource management plan and environmental impact statement does not reveal the extent to which poisoning programs have reduced or eliminated prairie dog complexes on private lands.
9. The resource management plan and environmental impact statement has no alternative that allows prairie dogs to exist in the ecosystem at natural levels. Every alternative is constrained by the same control program. There should be a “no control” alternative, as well as an alternative that recommends varying levels of control based on resource concerns.
10. The Miles City District Prairie Dog Management Plan fails to establish standards or guidelines for measuring “significant adverse impacts to soil and vegetative resources” that provide for prairie dog control.
11. There is no scientific literature that can be referenced showing damage caused to soil or vegetation by prairie dogs in the absence of livestock.
12. BLM must exercise caution in promoting recreational shooting of prairie dogs as they are the primary food source for several associated species and that food source is declining.
13. The resource management plan and environmental impact statement fails to address sylvatic plague that has decimated prairie dog population in many areas.
14. The combined impacts of long-term poisoning, unrestricted shooting and plague have brought prairie dog populations to historic lows.
15. The resource management plan and environmental impact statement fails to consider whether the cost of controlling prairie dogs outweighs the benefits. The final resource management plan and environmental impact statement should recommend that BLM do a cost/benefit analysis prior to control.
16. The Big Dry has been considered by state and federal agencies as a black-footed ferret recovery zone.
17. The resource management plan and environmental impact statement should examine the potential for black-footed ferret recovery in the resource area; explain the management changes that would be necessary to create black-footed ferret habitat and contain an alternative that provides for sufficient habitat for a successful black-footed ferret recovery.
18. Designate the 10,000 acre area described on page 367 of the draft resource management plan and environmental impact statement as an area of critical environmental concern for prairie dogs and associated species.
19. Prairie dogs on public lands should be controlled so they do not interfere with private lands, or obstruct the traditional multi-use approach to the management of BLM-administered lands.
20. Prairie dogs should be maintained at a predetermined population level so the possibility of the prairie dog becoming an endangered species is eliminated.
21. Need to broaden the scope of those who should receive knowledge of proposed changes.
22. Comment periods should be extended to allow all affected interests ample time to comment.
23. Need to work closely with all affected landowners on all aspects and phases of this proposed plan.
24. Need to address whether or not the current number of prairie dogs can be maintained without negatively affecting the viability of landowners operations.
25. Any loss of animal unit months by the livestock producer should be compensated by the Department of Interior.

26. A ceiling level of prairie dog numbers must be agreed to by the affected landowners.
27. Artificially expanding prairie dog populations can be an immense cost and an additional burden on our government. All costs incurred through this plan should be made readily available to the public.
28. Any land exchange with willing landowners must not result in any loss of existing animal unit months.
10. Impacts to soil and vegetative resources must be considered on a case-by-case basis for each specific site. Should a request be made to control prairie dogs on public land, an interdisciplinary team of BLM specialists would evaluate the request and decide if any control would be necessary.
11. Protein concentrations in vegetation in prairie dog towns is greater than protein concentrations in vegetation outside the towns. However, there is no conclusive evidence that plant productivity increases on prairie dog towns (O'Meilia, Eugene M. 1976; April D. Whicker and James K. Detling 1988; Daniel W. Uresk 1984 and Cid et.al 1991). The range sites where prairie dogs are commonly found in this area should have 75 to 85 percent midgrasses, 5 to 15 percent short grasses, 5 percent forbs, and 5 to 10 percent shrubs. Shortgrasses and weedy forbs commonly increase and midgrasses decrease due to continuous overgrazing in prairie dog towns. One study in a mixed grass prairie in South Dakota with bison and prairie dogs showed that when prairie dogs were removed, available grass material remaining on the site at the end of the year increased by 36 to 43 percent. Similar results were obtained when bison were removed and prairie dogs remained. The increase in available grass doubled when both prairie dogs and bison were removed (Cid et al. 1991). Available grass decreases and vegetation condition declines following prairie dog colonization (Koford 1958, Bonham and Lerwick 1976, Delsted et al. 1981, Coppock et al. 1983, Archer et al. 1987). In the absence of prairie dogs, vegetation can be managed for additional livestock forage and allow for increased grass material remaining at the end of the year. Contact the Rocky Mountain Forest and Range Experiment Station in Rapid City, South Dakota for further studies.

Responses

1. See text changes in chapters 1, 2, 3, and Black-footed Ferret Area of Critical Environmental Concern discussion in the area of critical environmental concern appendix.
2. This area was considered but not analyzed in detail (see chapter 2, "Alternatives Considered But Not Analyzed In Detail" under "Wildlife").
3. See text changes in chapter 2, "Wildlife".
4. BLM has provided management to allow prairie dogs to expand by several different means. There are no targets because of lack of data for habitat potential.
5. The area where the greatest amount of information on the size and distribution of prairie dogs was presented in the resource management plan (see map 23). There are other prairie dog towns on public land in Custer, Prairie, Rosebud, McCone, and Garfield counties, but little is known about these other towns. BLM is committed to inventorying prairie dog towns every five years.
6. See chapter 2, "Wildlife". Also, BLM monitors prairie dog towns at five year intervals (see monitoring table for information that may warrant a decision change).
7. Inventories of prairie dogs are conducted every five years.
8. This information is not available and therefore is unknown. However, general statements are found in chapter 4 under "Management Common To All Alternatives" (cumulative impact analyses).
9. Current management essentially allows prairie dogs to fluctuate at natural levels. In the past 15 years, only two control efforts have been conducted.
12. Recreational shooting of prairie dogs is done in cooperation with the Montana Department of Fish, Wildlife, and Parks and the U.S. Fish and Wildlife Service.
13. BLM recognizes the potential impact sylvatic plague can have on prairie dogs. Chapter 2, "Wildlife" lists plague abatement as a management action BLM could consider.
14. See response 8 above. Also, BLM is committed to proactive management of prairie dogs (see chapter 2, "Wildlife").
15. It would be difficult to prepare one benefit cost analysis to cover any and all prairie dog control

CHAPTER 5

Additional Responses

proposals. Benefit cost analyses will be a part of any control program on public land where federal dollars are being used.

16. The site in Custer and Prairie counties (Black-footed Ferret Area of Critical Environmental Concern) has been recognized as being a potential recovery area. At this point, the decision as to whether this area is or is not suitable for black-footed ferret reintroduction has not been completed.
17. See chapter 2, "Wildlife".
18. See text change in chapter 2 under "Wildlife" Alternative D.
19. The "Black-tailed Prairie Dog Management Plan for the Miles City District" provides the BLM the opportunity to manage prairie dogs when they impact adjacent private land. Prairie dog habitat is an integral part of the prairie ecosystem and as such, is a vital part of multiple-use management on public lands.
20. See response 9 above.
21. Due to budget constraints and for expediency, only those people who commented on the Black-footed Ferret Area of Critical Environmental Concern and were within commuting distance were notified of a proposed change. All persons who had concerns about the Black-footed Ferret Area of Critical Environmental Concern were given the opportunity to comment during the draft resource management plan and environmental impact statement comment period. The public presently has the opportunity to review this plan through a plan protest to the Director. BLM commonly meets with interested groups to gather comments, but no decisions are made until the impacts from alternative management prescriptions are considered. BLM then makes the final decision.
22. It is difficult to schedule a comment period that does not conflict with the public's schedule. Whether or not a deadline is met, all comments are taken into consideration in the record of decision.
23. See chapter 2, "Wildlife", under "Management Common To All Alternatives".
24. There is no proposal for reduction in stocking rates due to prairie dogs in the Black-footed Ferret Area of Critical Environmental Concern.
25. 43 CFR 4130.2(b) states that "Grazing permits or leases convey no right, title, or interest held by the

United States in any land or resources". The BLM has no authority to compensate livestock operators for forage consumed by wildlife.

26. BLM will continue to work with affected interests in prairie dog and black-footed ferret management.
27. Costs associated with this program are available at the Big Dry Resource Area office. If a specific area is proposed for expansion, cost estimates will be part of that activity plan. Impacts to landowners would also be identified in that environmental analysis.
28. There is no proposal for reducing stocking rates due to prairie dogs in this document.

Preferences and Opinions

1. Favor maintaining the area of critical environmental concern designation (2).
2. Favor the removal of the area of critical environmental concern designation, but continue to study the reintroduction of the black-footed ferret in the Big Dry Resource Area.
3. Favor the removal of the area of critical environmental concern designation.
4. The Big Dry Resource Management Plan and Environmental Impact Statement would have been an excellent forum for discussing the ecological role of prairie dogs, but BLM instead wrote the same plan it has been writing for 30 years.
5. There is not enough emphasis on control measures for prairie dog colonies.
6. The BLM has an obligation to undertake reasonable control measures where adjacent property may be threatened by prairie dog colonies.
7. Prairie dog control is most efficiently conducted by a cooperative effort between BLM and affected landowners.

The following names are the seven parties who responded to BLM's letter on the Black-footed Ferret Area of Critical Environmental Concern.

Defenders of Wildlife and the Natural Wildlife Federation
Garfield County Board of County Commissioners
Haughian Livestock Co.
Montana Stockgrowers Association
Beth Riggs

Sierra Club
Southeastern Montana Livestock Association

CONSISTENCY

Coordination with other agencies and organization and consistency with other plans were accomplished through frequent communication and cooperative efforts. Local groups have been consulted to insure awareness of the plan and objectives.

The Montana Governor's Clearinghouse have been supplied copies of this final document for review to insure consistency with the state's plans. The BLM also has coordinated with the Native American tribes and the U.S. Fish and Wildlife Service.

DISTRIBUTION LIST

The BLM requested comments from industries, businesses, individuals, and special interest groups, federal, state, and local agencies, and from Native American tribes. Information has been distributed to the organizations, agencies, and individuals listed. This plan is available at the Montana State Office, Miles City District, Big Dry Resource Area, and Jordan field offices; and county libraries.

Congressional Offices

Committee on Interior and Insular Affairs
Representative Pat Williams
Senator Max Baucus
Senator Conrad Burns

Federal Agencies

Advisory Council on Historic Preservation
Department of Energy
Department of the Army
Department of the Interior
Environmental Protection Agency
Federal Highway Administration
Office of the Field Solicitor
Office of Surface Mining
U. S. Army Corps of Engineers
USDA, Agricultural Stabilization Conservation Service,
State Office
USDA, Forest Service
USDA, Fort Keogh Livestock and Range Research Station
USDA, Montana Soil Conservation Service State Office
USDA, Soil Conservation Service Offices
USDI, Bureau of Indian Affairs

USDI, Bureau of Land Management
USDI, Bureau of Mines
USDI, Bureau of Reclamation
USDI, Fish and Wildlife Service
USDI, National Park Service
USDI, Office of Environmental Project Review

Individuals

Diane Adams
Julie Adamson
Dr. Christine Adler
Barb Albers
Henry Aldrich
Allen Alerding
Joyce Almy
Dayton Alsaker
Edwin H. Ames Jr.
Jerry Amsler
Arthur (Andy) Anderson
Dewey Anderson
Loyd Anderson
Robert M. Anderson
Scott Andrews
Genevieve Arensdorf
Norman P. Arsian
Berdette or Vilma Askin
Kermit Askin
Dave Atkinson
Tom and Edna Atkinson
Atwood Estate
Norman C. Atwood
Francis Ausk
Jim and Jo Ausk
Grace Baker et al
David A. and Benjamin A. Balducki
Brian Ban
Frank Ban
Alex Barclay
David Barnick
Al Bassett
Arnold Bejot
Milton Benge
Dave and Jessie Bennett
Joe Benson
Waldo Bentley
Dennis Berg
Paul Berg
Paul and Rosie Berger
Bill and Bruce Bergerson
Clifford M. and Clifton M. Berglee
Tim Bernardis
Bonnie Berry
Delbert J. Berry
Ken Berry

CHAPTER 5
Distribution List

Wilson Scott Berry
Lynn Bice
Jean Bidegaray
Don Bidwell
Richard Biery
Leo and Judy Billing
May Billing
Monte Billing
Ross A. Billing
Frank Birtic
Bobbi Blankenship
K. L. Bliss
JL Bloom
Michael W. Bobock
Dave Bode
Nels Boe
Kevin Boehler
Henry and Mae Bohle
Ira and Ethel Bond
Larry Bond
E. B. Bondell
Claribel Bonine
Stan Boone
Duwayne and Nellie Booth et al
Dave Bordenkircher
Milo and Karsten Borg
Sam Borla
Arthur and Verna Bouchard et al
Russell Boulding
Steve Boysun
Tom Breitbach
Joe Brittsan
Mr. and Mrs. Doug Bronson
Bill Brown Jr
Bruce Brown
Dale Brown
Thominna W. Brown
Ted Browning
Jack and Virginia Brubaker
Elwyn Brunner
Bill and Susan Buckingham
Fred Buldhaupt
Janet A. Buldhaupt
Terry L. Burbach
Dan Burgess
Viola and Bruce Burgess
Mary Burman
Ed Burritt
Gentry Bush
Doug Buxbaum
Gene Buxcel
Pastor Harvey Bybee
Mike Cadwell
Loren Cale et ux
Chris Cameron
Clyde S. Cameron
Colin E. and Jean Cameron
Neal C. Cameron
Alfred Candee
Robert Candee
Ernest Carlson
Charles Carranco
George Carter
Tim Carter
Willard Carter
G. J. Cayer
John Cayko
Gary Ceynar
Don H. Chaffee
Donald Bruce Chaffee
Lyle Chamberlin
Lee and Helen Chapman
A. Chavan
Ross Childers
Eva M. Clark
Karla Clark
Mr. and Mrs. Walter Clark
Newell Clarke
Duane Claypool
Caroline S. Close
Jason Coburn
Doug Coffman
Cole Coldwell
Jerry Coldwell
Leah Cole
Reland and Eleanor F. Cole
Alex Collie
Walt Collins
John Colness
Don B. Colton
Mel Conley
Sue Connors
Burhl Cooke
Jerome D. Cooksey
Betty Jean Cooley
George Coon
Rod J. Cooper
Nathan Copple
Virgil Cornelia
E. and Leonard Corneliusen
Kenneth A. Coulter
Rod Coulter
Jim Courtney
Dave Covert
Larry J. Cox
Vince Crago
Clyde Crawford
Stella Crawley
Bill Cundiff Jr.
Dan Currie

Jerry Curtis
Russel and Maureen Curtiss
Welcome J. Curtiss
Leonard Daniel
Frank Daniels
Richard Dansereau
Robert E. Danskin
Cathy Danzeisen
Bruce Daughton
Lorn Davis
Rich Day
Willie and Katheryn Day
Jean Dekker
Mr. and Mrs. Harley Delange
Robert Delp
Kerry Dennitt
Scott Denson
Ernest Dent
Bill Deshaw
Mearle or Irene Detienne
Tod and Ron Devlin
Tim DiChiara
Rudy and Marie Diegel
Neva Dissly
Paul Dobbin
Gene Domagala
Edith H. and E. J. Doncaster
John F. and Clair Marie Doran
Elmo Dreyer
L. Dschaak
Daniel D. Dukart
Peter J. Duke
Bette Dunnam
Jean Durbin
Ingrid (Senner) Dviraak
Sherman Dynneson
Elner Eaton
Lawrence Edwards
Rose Edwards
Leonard Ehret
Connie Eissinger
Jim Elder
Burton Elliott
Lester D. Engdahl
Mary Ann Engdahl
John Ensign
Carl J. Erickson
Dale Erickson
Harold D. Erlenbusch
Carl Etzel
John Fahdl
Jean and Bud Failing
Ed Falkenstern
Janelle Fallan
Tony Feisthamel
Cliff Feldman
David A. Fell
Dale Fellman
Phillip and Ethel Fellman
Jim Ferch
Charles Ferguson
Steve Ferrin
Don and Dorothy Finneman
Ernest E. Fischer
Gerald Fischer
Ken Fischer
Alvin O. Fisher
Michael Fisher
Fred A. Fitch
Mark Fix
Bill Flekkenstein
Ted Fletcher
Glenn Follmer
Fannie Lee Ford
Bernie Forman
Elmer Gene Foss
Harry and Mary Foss
Kenneth Foss
Gerald Frank
Charles Franks
Bill Freese
Larry French
Emil Fried
John W. Friede
John P. Fries
William Roger Fuchs
Hal Fuglevand
John Fuller
Dale A. and Florence J. Funk
Alvin Gackle
Galland Family
Edward Gaub
Henry Gaub
John Gauer
Pam Gauer
Roy W. Gentry
Lee Gibbs
Sarah Gibson
Clarence and Audry Gilge
Barbara K. Girdler
Gus Glasscock
Ray Glueckert
Iva Mae Goff
Doug Goodall
Bud and Bette Goplen
Gary Graves
Mary Gravitt
Robert J. Gray
Scotty Gray
Lyla Green

CHAPTER 5
Distribution List

Larry Greenlee
Emmett Gregerson
Bob Gregg
Grant and Alta M. Greiman
Michael Grende
Buford Griffin
Mark Griffith
Marty Griffith
Bill and Lyle Grist
Glen and Loraine B. Grist
Paul T. Groell
Jim Groh
Sid Grovenstein
Allen R. Grow et al
Clinton Grue
Tom Grunhuvd
Mike Guelff
Conrad W. Gustafson
John N. Haas
Don and Marj Haber
Harold R. Hafeman
Anton Hafla
Arthur Hagen
William Haggerty
Anna Hahn
Fred Haidle
Freda R. Haidle
Kevin Haidle
Lynn Haidle
Diane Halverson
R. A. Hamman
James Hanks
Penny Hanna
Walter J. Hanratty
Duane A. Hanson
Keith Hanson
Randy Hanson
Charles M. and Victoria E. Hardy
Vernon Harms
Dave I. and Joanne Harris
Paula Harrison
Marge Hart
Alvin Hasty
Mary Haughian
Quinn Haughian
C. M. Hauptman
Dave A. Hayden
Tavia Hayes
A. R. Hays
Harold Heafield
Karl Hedrick
Dr. George L. Hegge
Edmund E. Heinle
Dale Hellman
Larry Helvik
Bob Henriksen
George A. Hensleigh
Jim Hentges
Carl Hepperle
Ted Hepperle
Alida Herigstad
Gerald Herigstad
Richard P. Herman
John Herzberg
Aileen Hess
Dick Hess
Richard G. Hess
Vera Heurer
Mrs. Leon Hicks
Royce Higgins
Clifford Highland
Dr. Joel Hillhouse
Nora O. Hilliard
John Hingtgen
Helmut and Nina Hintz
Jacob Hirsch
Fred Hoeger
Neil Hoff
Paul Hoff
Gary Hoffer
Roland Hoffman
Gary and Linda Holman
Wayne Holmlund
Al Homme
Bill Hopkins
Leo J. Horgan
Tom Horn
Roland C. Hoselton
Don Hotter
Dean Houck
Cliff Householder
Lynn H. Householder
May G. Hovland
Jennifer Howard
Solvejg Nelson Howard
Dale Hubber
Dale Hubbert
Walter E. Hubble
Virgil T. Huffman
Kurt Hughes
Donald G. and Marian M. Huseby
David Huston
Vi Irion
Harry Ironstad
Robert J. Irvine
Harold Lee Isaacs
Matthew James
Nick Janich
Monte Jarvis
Joan O. and Waring S. Jenkins

David Jennings
Larry Jens
Lester Jens
Bob Jensen
Marshall D. and Gordon D. Joelson
Cody Johnson
David W. Johnson D.D.S.
Floyd Johnson
Gene Johnson
Melvin P. Johnson
Norman Johnson
Harold A. and Laverne A. Jorgensen
Dale J. Josewski
Alan and Janice Just
Frank Kanta (Heirs)
Glen Kapitzke
Dave Kasten
Fred J. Kaul
Dean Keirle
Ervin H. Keirle
Alan Keith
Claude Keith
Bill Kellner
Pat Kelly
Rodney A. and Marilyn K. Kelly
Chris and Christine Keltner
Lawrence and Kim Keltner
Joseph Kimball
Boyd Kincheloe
Don and Jacquia King
Jack E. King
Ron Kiosse
Eugene K. and Barbara Ann Kirchner
Dorothy S. Kirk
James Kirkland
Elroy Kittleson
Ronald Kjelgaard
Martha Klempel et al
Kim Knudson
Greg Koczer
Walt and Linda Koehler
Walt Koenig
Kirk Koepsel
Melvin Kohlman
Howard Kohn
Jim Kolden
Elizabeth and David Koster
Dick Kranzler
Butch Krutzfeldt
T. C. Kryzer
Kenneth Kubesh
Nell Kubesh
John Kuehn
Kevin Kuehn
Len J. Kuntz
George Kurkowski
Charles A. Kutzler
Curt Kyle
Jordon Labree
Ervin Laib
Matthew Lane
Christ Lang
Bruce Lantis
Gary Larsen
Arnie Larson
Herb and Helen Larson
Rodney Larson
Daniel Lassle
David C. Lassle
Lum Latimer
Peter Laue
Mr. and Mrs. George B. Laughlin
Geraldine Lawson
J. R. Lee
Joe K. Leland
Harold and Twyla Ler
Arnold Lesmeister
Theo H. Leuenberger
Nora Levalley
Edward Levin Jr.
Keith Lewis
Kent Liles
Mike and Cathy Liles
LH Vern Lindquist
Thomas A. Linell
Mary Linford
David A. Linn
Natalie Lnomas
Clara Loberg
Gardner Loberg
Jane Logan
Mabel Loomis
Craig Lorntson
Robert Loughney
Dr. Adele Lukaszewics
John and Tracey Lynn
Chester Macioraski
Mary Mackay et al
Mike Madler
William Magelssen Estate
Robert Mahnke
Scott Mainwaring
Ken and Mac Makelky
James R. Malkuch
Robert Markeloff
Amy Martin
Ford Martin
Irene Martinson
Ralph C. Mason
Buzz Mattelin

CHAPTER 5
Distribution List

Bruce Mayes
Alison McAlpine
John and Candace McBride Jr.
William McCall
Betty McCarthy
Gary McCrea
Gary McDanold
Archie G. McDonald
Michele A. McElderry
Elvis McGee
Charles McGinnis
Charles and Clifford McGinnis
Mary F. McGlynn
Tom McGonigal
Kevin McGovern
Jean McGraw
Mike and Noreen McKeever
John McKerlick
Mike McManus
Linda McMullen
Charles McRae
Donald, Duncan, and Arthur McRae
David and Sonia Meccage
Kenneth Meccage
Curt Meeds
Glen Meidinger
Harold and Delynn Meidinger
Murray and Pauline Melcher
C.E. Mendenhall
Glenn Mendenhall
Russell G. Mercer
Harold E. Meyer
James Michels
Sylvia and Fred Mickelson
Bruce Miller
Suzanne R. and Tom H. Miller
Henry A. Miller Jr.
Donald J. and April Milroy
Bill Milton
Henry Mischel
Scotty Mitchell
Terry and Jean Mitchell
John Henry Patrick Moerman
Donald W. Moffett
Irene Moffett
Ruthyn Mohl
Charles Moline
James N. and Bertha Moline
L. M. Moline DDS
Wayne Moline
Carter Mollgaard
Heather Moon
Neil Morck
Sia Morhardt
Robert and Evelyn Morrison
Robert C. Mothershead
Catherine K. Mueller
Wayne and Geraldine Mulkey
Clark Murnion
Coleman Murnion
John Daniel Murnion
Larry Murnion
Arling and Ruth Myhre
Art Needleman
William Nefsy
Bob Nefzger
Eugene C. Nelson
John and Sharon Nelson
June Nelson
Lyle Nelson
Margaret Scott Nelson
Robert Nelson
Kenny Nemitz
Merlin Nemitz
Floyd Neumann
Jane Neumann
Bob Neumann
Jack W. Nickels
Lester Nickels
Russell Nickels
H. A. Niemeyer
Rocky Niles
Mike Nitschke
Taffie Norris
Peter Novakovich
Laurel O'Connor
Alfreda Ofstedal
Les Ollerman
Ben G. Olson
Frank and Diane O'Neill
Amanda O'Reilly
Jack O'Reilly
Kirk Overby
John Pamperin
Mark Parman
Parsons Estate
Delbert H. and Sandra Jo Pawlowski
Wendell Pawlowski
Wilma Pawlowski
Harold Peabody
Rachel Pederson
Alice and Charley Pehl
Walter and Dorothy Pelech
Dave Peplinski
Paul P. Peplinski
J. Perhman
Arthur Perschke
Robert A. Petermann
Carol and Larry Peterson
John A. Peterson

Marian Rita and George Petrie
Paul Petrusha
Bob Phipps
Robert Phipps
Don R. Piesik
Wanda Pinnow
Joe Pisk Jr.
Wes and Elza Plann
Russell Pluhar
Olive Pointer
Clifford Pollert
Frank and Debra Popper
Rob Porter
Vernon Preuss
Stanley Price
John Prince
Duane and Kathleen Pust
Jeff Qualley
Lyle and Donna Quick
James N. Rahr
Bill Raisl
Jackie and Bernie Rakes
Fred Rambur
Jean E. Rankin
Bill Rathert
George Raths
Dr. Rauh
Don Record
Alice M. Belisle Reed
Jason Reichel
Jack A. Reichert
R. H. Reidinger
Doug Rein
David E. Reis
Paul Renn
Robert H. Renz
Rob Reukauf
Rodger Reuther
Floyd Revell
Robert F. and Ruth Reynolds
Elden Rice
Velma Rice
Lee Richardson
Carl Rieckmann
Edwin Rieger
Helen Rieger
M. Roy Rieger
Wayne Rieger
Beth Riggs
Ralph Rising
Kathie S. Ritchey
George Rittal
Jim Rittal
Tim Rittal
David Rivenes

Jack Robbins
Roy Roesler
Mrs. Rogerson
Edwin R. Rogge
Linda Roney
John P. Roos
Ruth V. Roos
Roger Root
Newell S. Rosaaen
Olga M. Rosche
Clair L. Ross
Mervin Rost
Alice M. and Morris J. Royan
David L. Rummel
Howard and Cheryl Ruppel
Truman Gary Rusley
Jim Ryan
Gary Ryti
Isador Sackman
Lyle Sackman
E. Edgar Salsbury
Carol Samuelson
James Sanchez
Rick Sandberg
Forrest Sanders
Richard Saunders
Don Sautner
Joseph F. Savine
Claude Saylor
Jerome Saylor
Lewis M. Saylor
Walter D. Saylor
C. B. and Cliff Schantz
Richard H. and Elaine O. Schara
John Scheuering
Allan P. and Shirley Schillinger
Ray and Fern Schillreff
Emma Schipman
Theodore Schmidt
Lois N. and Albert J. Scholz
Rob and Marjorie Schriver
Archie Schroeber
Richard R. Schueler
Marlene Schultz
Daniel C. Schumacher
Fred E. Schumacher
Todd Schwartz
Alice Kay Schweigert
Jim Schweigert
Jack Schwend
Don Seleski
Chris Severson
Alan Sevier
Mr. and Mrs. J. W. Shaffer
Norm Shannon

CHAPTER 5
Distribution List

Boyd and Marion Shaver
Ray Shawver
David Shearer
Donald J. Shearer
Orville J. Shefelbine Sr.
Ernest E. Shireman
Ray Shore
P.D. and Ests of W.A. and R.S. Shoup
Scott Sigel
Don Silbernagel
Wilhelm Singer
Doug Singleton
Clarence Sipma
Anton Sir
Edward A. Skaar
Kris Skyberg
M. D. Slehofer
Pat Sloan
Jerry Smalis
Doug Smith
H.I. and Annette Smith
Jeffrey Smith
Roy Smith
Lloyd Sohl
Ed Solle
R. W. Sonsalla
Gill Sorg
Clifton A. and Calvin D. Sowle
James Frank and Goldie E. Sparks
Thomas Sparks
Eva E. Spaulding
Dr. and Mrs. Stanley B. Speck
Elmer Spidel
Christian Spies
Jack Spithoven
Lee Stafford
Margaret Stafford
Charles Steadman
Eric Steadman
Clarence A. Steffen
John W. Steffen
Bud Stevenson
Albert M. Stewart
Phil Stewart
Alvin Stickel
Ervin Stickel
John W. Stifler
Dale A. Stirling
John A. Stolen
Glen Stone
Bob Stordahl
Neal Strand
Raymond Strasheim
Arthur Straub
Helmut and Edna Straub

Reiny Straub
Terry Straub
Dale Strobel
Ray Stubberud
Ned Summers
Phyllis Sundberg
Harold C. Sutherland
Orville and Inez E. Svingen
Carl A. Swanson Jr.
Jim Swanson
John R. Swanson
Mary Cato Swayne
Lyle Swenson
Larry J. Switzer
Dr. HT Swogger
Tom and Liz Swogger
Jack Swope
Lyle Tauck
Bernis E. Taylor
Clay and Karen Taylor
Dallas Taylor
Dr. John Taylor
Ken Taylor
Rex Taylor
Steve and Margie Taylor
Jonathan M. Teague
Dwight E. Thiessen
Peter D. and Nancy Mae Thiessen
Steve Thoeny
Carl Thomas
Lee Thomas
Melvin Thomas
Don Thomason
Kevin Thomason
Daniel Thompson
Ty Throop
Ron Tibbetts
Steve Tibbetts
Jerry Tillman
Dr. Greg Tooke
Larry Torstenbo
Margaret E. Toulouse
Harry F. and Minerva Townley
Lorraine Traeger
John Trask
Mark Trask
Jim Trogden
Dennis Trudell
John Trumbo
Maurice Tunby
Neil Turnbull
Art Turner
Kenneth Turner
Robert Tveten
Judd Twitchell

Agnes Ueland
Glenda Ueland
Donald and Kurt Ulrich
Mrs. Gudrun K. Udem
Bruce Unger
Leslie R. and Marie J. Unruh
Floyd Usselman
James Vaira
Jason Van Doren
Charles P. Van Epps
Don Varner
Marvin Varner
Rocco Varriano
Delbert Vine
P. L. Vogel
Robert G. Voorhees
Bill Wahl
Eldfon Wahl
Loren L. Wahl
Matt Wald
Richard and Marge Waldo
Roland J. Walker
Beulah and Sander Waller
Glen Waller
Helen and Harold Waller
Dulane and AnnaMae Wang
S. Warble
Brent Ward
Mrs. Dorothy K. Ward
Marie and Harry Ward
Jonathan Watt
Harvey Watts
Henry Watts
Ed Weidemann
Willie Weigum
David A. Welliever
Clarence Wenz
Richard Wenz
Jean Armour Whaley
Wheatcroft Trust
Jim Whiteside
Lloyd P. and Rosalie Wicks
Tim Wildman
Burl Willardson
Jeff Williams
Charles Wilson
George T. Wilson
H. B. Wilson
Richard C. Wilson
Robert Wilson
Kenenth Wiman
Janine Windy Boy
Stephen A. Wineteer Jr.
Duane Winters
Melva C. Wirth

Hans Wischmann
Ms. Pauline E. Wischmann
James Wiseman Jr.
Melvin Wolenetz
Bernard Wolff
Dennis Wolff
James Wolff
T. Z. Wood
Alex Woodruff
Ronald Woodruff
C. Peter Wurr
William H. Wyman
Don and Gladys Helen Young
Ione Young
James A. Young
P.Z. Zadis
Ruth Zeller
Assistarles Zielsdorf
Duane Zimmerman
William Zumpf
Pete Zwaneveld

Industry and Business

7W Ranch
Abraxas Petroleum Corp.
Adobe Oil and Gas Corp.
Agri Resources
Allerdings Ranch Inc.
American Petroleum Institute
American Rivers, Inc.
Amoco Production Co.
ANR Production Co.
ANR Production Co.
Arco Oil & Gas Co.
Arnston Ranch Inc.
B E G Inc.
Baker Livestock Exchange/Keystone Ranches
Balcron Oil Co.
Bar B Q Beef Ranch Inc.
Bassett Land & Livestock
Beartooth Oil & Gas Co.
Bechtold Ranch Inc.
Beecher Ranch Inc.
Bickle Inc.
Big Timber Livestock Co
Billingsley Ranch Outfitters
Boucher Ranch Inc.
BP Exploration
Chris Branger Outfitter
Breck Operating Corp.
Broschat Engineering & Management Services
Brown Dental Clinic
Browning Brothers
Buerkle Brothers

CHAPTER 5
Distribution List

Butte Pipeline Co.
Butte Resources Inc.
Buxbaum Brothers
BWAB Inc.
Cenex
Cherry Creek Ranch
Chevron USA Inc.
Coastal Oil & Gas Corp.
Coca Cola Bottling Co., Inc.
Conoco Inc.
Coon Creek Ranch Co.
Cottonwood Ranch Inc.
Crissafulli A & M Rental & Farms
Cusker Inc.
D K Incorporated
Davis Oil Co.
Devon Energy Corporation
Diamond Ring Ranch
Double H Ranch
DX Land & Livestock Co.
Ehret Land Co.
EIK Exploration
The Ellis Co.
Empire Sand and Gravel
F & W Enterprises
Flying V Apts Inc
Frady Ranch
Garber Land & Livestock Co.
Great Plains Resources, Inc.
Grue Ranch
Gumbo Ranch Inc.
Haglof Ranch Corp.
Halliburton Services
Hancock Enterprises
Harbaugh Ranch
Hay Creek Inc.
Helmerich & Payne Inc.
Herigstad Ranch Inc.
Hillside Ranch
Historical Research Associates
Hondo Oil & Gas Co.
Hot Bar Land & Cattle Co.
Hubbard Ranch Inc.
Hubing Ranch Inc.
Hunters Montana
Husky Oil Service
Independent Petroleum Association Mountain States
Island Creek Coal Co.
Jensen Bros of Circle Inc.
Jones Outfitting Service
Jordan Insurance Service
Kendrick Cattle Co.
Kibler Outfitting & Guide Service
Knife River Coal Mining Co.
Koch Exploration Co.
Lange Inc.
Lazy Seven-Up Ranch
LCM, LTD
LO Bar Cattle Co.
Lone Pine Ranch Inc.
Loomis & Sons Inc.
Lost Coulee Outfitters
Luff Exploration Co.
Lund Implement
MacDonald and Sons
Mackay & Mackay Ranch
Mackay Ranch
Mahlstedt Ranch Inc.
Mann Farms Inc.
Marathon Oil Co.
Materi Exploration Inc.
MBT Inc.
McCone Electric Coop Inc.
McMullin Brothers
Meidinger & Son
Meridian Minerals Co.
Meridian Oil Inc.
Mid Rivers Telephone Coop
Milan Basin Creek
Miles City Packing Co.
Mondalin Inc.
Montana Electric Coop Assoc
Mountain States Telephone/Telegraph
Mountain West Research
Mullendore Farms
Munsell Ranch Inc.
Murphy Oil Corp.
Mysse Ranch Co.
Nash Bros Inc.
Navratil, Unmack & Herring, Attorneys at Law
Nemitz Ranch
Nerco Coal Corp.
North American Coal Corp.
Oryx Energy Co.
Peabody Development Co.
Peabody Western Coal Co.
Perkins and Son Outfitters
Pfaff Ranch Inc.
PIC Technologies
Pinnacle Ranch
Pollard Ranch Comp Partnership
Powers Elevation
Prairie Elk Ranch Inc.
Prod. Co. Land Department
Quarter Circle db Inc.
Frank A. Radella Inc.
Reno Creek Ranch
Reynolds Warehouse Grocery
Rich Ranch
Rio Algom Mining Corp.

Rogerson Auto Repair and Gift
Roundup Resources
S-X Ranch
Sante Fe Energy Co.
Schiffer Ranch Co.
Schillinger & Sons Inc.
Schmidt Herfords Inc.
Seteren Ranch
Shell Oil
Shell Western E & P Co.
Sidney Oil Company
Snap Creek Ranch
Snell & Sons
Snowbelt Angus Ranch
Spear J. Inc.
Stark Livestock
Steffes Inc.
Stovall Oil Company
Straub Bros.
Strobel & Son Inc.
Terrett Ranch Inc.
Texaco Inc.
Thielen Ranch Co. Inc.
Thiessen Inc.
Tierra Tecumseh
Tom Brown Inc.
Towe Farms Inc.
True Oil Co.
Tuck & Assoc.
Union Pacific Railroad
Union Pacific Resources
Wagner Inc.
Waters Inc.
Wenz and Sons
Westech
Western Oil World
Western Utilities Group
Wheatcroft & Sons
White & Assoc.
Williston Basin Int. Pipeline
Wittkopp Inc.
Wolff & Sons Inc.
Yerbalinda Ranch Inc.

Interest Groups

Advocacy Unlimited Foundation
American Rivers
American Wildlands
Audubon Council
Big Open Project
Citizens for Freedom
Connecting Point for Public Lands
Culbertson Chamber of Commerce
Custer County Chamber of Commerce

Dawson County Arts Unlimited
Dawson County Chamber of Commerce
Dawson Resource Council
Defenders of Wildlife
East Custer Coop State Grazing District
Eastern Montana College
The Ecology Center
Fallon County Chamber of Commerce
Fallon County Stockgrowers and Landowners Assoc.
Fallon County Taxpayers Assoc.
Farm Credit Services
Friends of Makoshika
Garfield County Chamber of Commerce
Glendive Area Chamber of Commerce and Agriculture
Glendive Jaycees
Independent Petroleum Association of Mountain States
Land Trust Alliance
McCone Agricultural Protective Organization
McCone County Chamber of Commerce
Miles City Jaycees
Miles Community College
Mineral Exploration Coalition
Montana Association of State Grazing Districts
Montana Black-footed Ferret Work Group
Montana Bowhunters Association
Montana Cattlemans Association
Montana Chapter of American Fisheries Society
Montana Chapter Sierra Club
Montana Chapter Wildlife Society
Montana College of Minerals, Science, and Technology
Montana Farmers Union
Montana Geological Society
Montana Guides and Outfitters Assoc.
Montana Mining Association
Montana Native Plant Society
Montana Petroleum Association
Montana Public Lands Council
Montana State University
Montana Stockgrowers Association
Montana Wilderness Association
Montana Wildlife Federation
Montana Wool Growers
Museum of the Rockies (Montana State University)
National Audubon Society
National Coal Association
National Heritage Program
National Wildlife Federation
Natural Resources Council
Natural Resources Defense Council
Nature Conservancy
North Dakota Lignite Council
Northern Plains Resource Council
Northwest University
People for Economic Progress
Plattsburgh State University of New York

CHAPTER 5
Distribution List

Prairie County Chamber of Commerce
Prairie County Coop State Grazing District
Red Buttes Coop State Grazing District
Richland County Chamber of Commerce
Rocky Mountain Oil and Gas Association
Roosevelt County Chamber of Commerce
Rosebud Audubon Society
Rosebud Treasure Wildlife Association
Sierra Club
Smith Creek Grazing Association
Southeastern Sportsmen Association
United Mine Workers
University of California
University of Idaho
University of Montana
University of North Dakota
University of Notre Dame
Valley County Chamber of Commerce
Vets Club
Western Environmental Trade Association
Wibaux County Chamber of Commerce
Wilderness Society
Williams Coulee Coop State Grazing District
Women Involved in Farm Economics
Yellowstone Valley Chapter of Audubon Society

Local Government

Carter County Commissioners
City of Baker
City of Bowman, North Dakota
City of Circle
City of Culbertson
City of Glendive
City of Jordan
City of Miles City
City of Plentywood
City of Poplar
City of Scobey
City of Scranton, North Dakota
City of Sidney
City of Terry
Custer County Commissioners
Daniels County Commissioners
Dawson County Commissioners
Dawson County Farm Bureau
Dawson County Planning Board
Dawson County Weed Board
Ekalaka Town Administrator
Fallon-City/County Planning Office
Fallon County Commissioners
Fallon County Extension Agent
Fallon County Planning Board
Fort Peck Planning District
Garfield County Commissioners

McCone County Commissioners
McCone County Extension Agent
Miles City-City/County Planning Office
Prairie County Commissioners
Prairie County Disaster and Emergency Services
Prairie County Extension Agent
Richland County Agent
Richland County Commissioners
Roosevelt County Commissioners
Rosebud County Commissioners
Rosebud County Extension Office
Sheridan County Commissioners
Sidney City Planning Board
Town of Ekalaka
Town of Wolf Point
Valley County Commissioners
Wibaux County Commissioners
Wibaux County Planning Board
Wolf Point Service Director Planning Board Coordinator

State Government

Central Montana Resource Conservation and Development
Areas
Culbertson-Bainville County Conservation District
Custer County Conservation District
Daniels County Conservation District
Daniels County Conservation Service
Dawson County Conservation District
Eastern Plains Resource Conservation and Development
Energy Development Impact Office
Garfield County Conservation District
Governor of Montana
Governor's Office Policy Advisor
Little Beaver Conservation District
McCone Conservation District
Montana Association of Conservation Districts
Montana Bureau of Mines and Geology
Montana Coal Board
Montana Department of Agriculture
Montana Department of Budget and Planning
Montana Department of Commerce
Montana Department of Fish, Wildlife, and Parks
Montana Department of Health and Environmental
Sciences
Montana Department of Natural Resources and
Conservation
Montana Department of State Lands
Montana Division of Federal Highway Administration
Montana Environmental Quality Council
Montana Farm Bureau
Montana State Board of Oil and Gas Conservation
Montana State Historic Preservation Office
Montana Water Courts

North Dakota Energy Development Impact Office
Prairie County Conservation District
Richland Conservation District
Rosebud Conservation District
Sheridan Conservation District
State Representative Ernest Bergsagel
State Representative Ellen Bergman
State Representative Marian Hanson
State Representative John Johnson
State Representative Betty Lou Kasten
State Representative Don Holland
State Representative William Rehbein, Jr.
State Representative Dore Schwinden
State Representative Charles Devaney
State Representative Tom Zook
State Senator Linda Nelson
State Senator Gerry Devlin
State Senator Daryl Toews
State Senator Larry Tveit
State Senator Ric Holden
Valley County Conservation District
Wibaux Conservation District
Wyoming Oil and Gas Conservation Commission

Tribal Government

Crow Tribe Tribal Chairman
Fort Peck Tribal Mineral Resources
Fort Peck Tribes
Fort Peck Water Resources Office
Northern Cheyenne Cultural Commission
Northern Cheyenne Tribal Council
Turtle Mountain Band Tribal Office

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