



ISSUES AND OTHER RESOURCE AREA RESPONSIBILITIES

ISSUE-DRIVEN PLANNING

The Bureau of Land Management (BLM) planning regulations generally equate land use planning with problem solving or with issue resolution. An issue may be defined as an opportunity, conflict or problem regarding the use or management of public lands and resources. Obviously not all issues can be resolved through land use planning, but may instead require changes in policy, budgets or legislation.

As a practical matter, issue-driven planning means that only those aspects of current management direction that are felt to be at issue are examined through the formulation and evaluation of alternatives. Alternatives are not developed for those aspects of current management direction that are felt to be satisfactory.

Responses obtained through public meetings and brochure mailings helped to identify 13 issues. These issues were examined to develop alternative means of resolution. The alternatives were then grouped into several management themes, or land use plan alternatives that provide different levels of management capability.

The direction to resolve issues in certain ways was provided by the District Manager based on existing policy, public desires and resource capabilities. In addition, planning criteria (standards and guidelines) were developed to guide the resolution of the issues (see Appendix 1.3).

ISSUES CONSIDERED BUT NOT ANALYZED AS PART OF LAND USE PLAN ALTERNATIVES

Several of the original issues and concerns identified by BLM specialists were not carried forward when further analysis revealed that they were not items of major concern, or sufficient data for analysis purposes simply does not exist. The following synopsis addresses these issues and describes ongoing management direction.

1. Corridor Planning

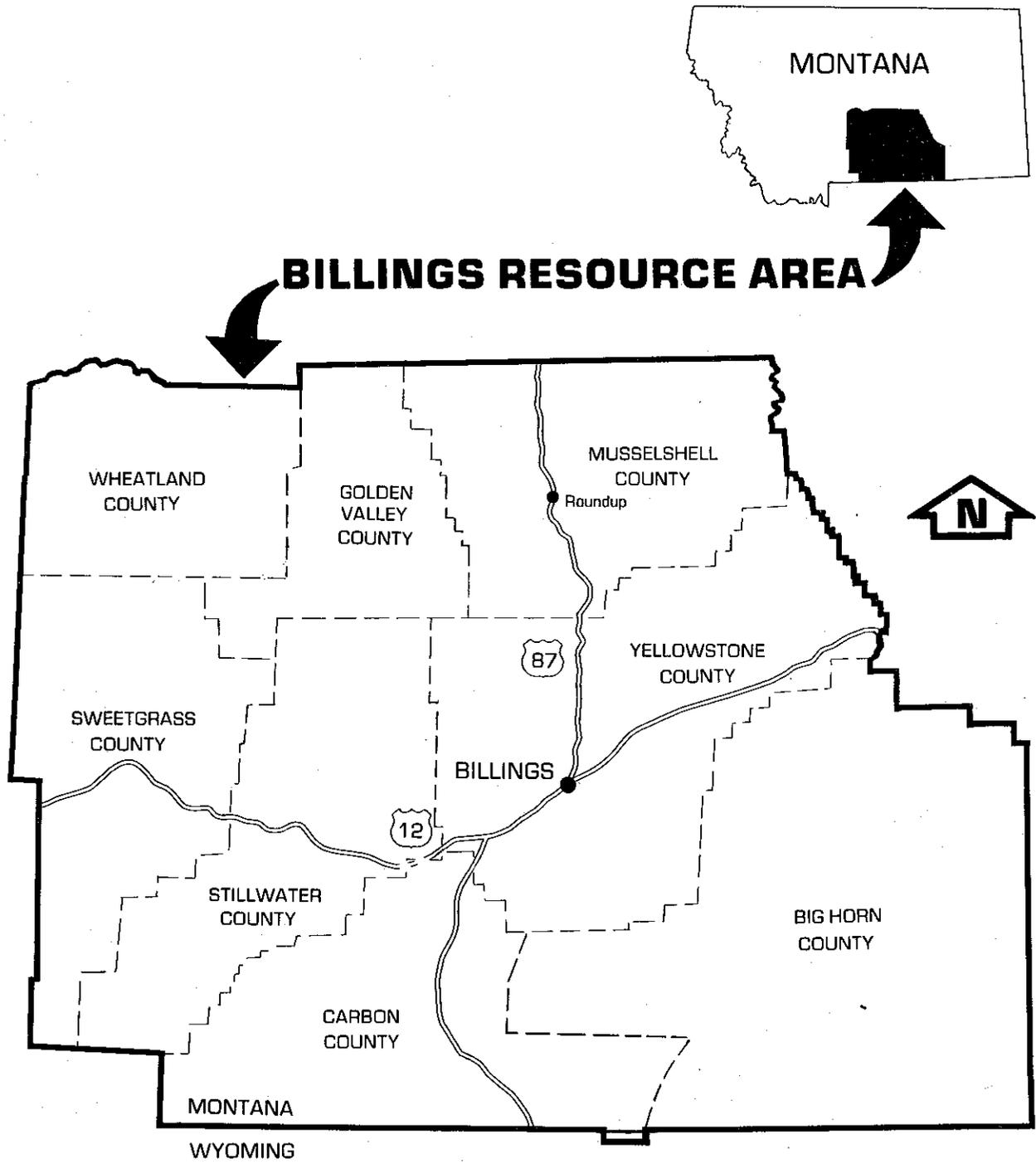
There is currently a state and Federal effort underway to identify utility and transportation corridors (see Utility-Transportation Corridor Study for Montana). There are numerous de facto corridors in the Billings Resource Area. These consist of major oil and gas pipelines (see Map in Oil and Gas Conservation Division Report); Interstate Highways 90 and 94; U.S. Highways 87, 310, 212, 191 and 12; State Highways 72, 3 and 78; and the Colstrip Power Transmission Lines. This resource management plan will apply corridor planning criteria according to State Director Policy. The corridor planning criteria appear to apply to the following areas:

Exclusion Areas (see Glossary)—The Twin Coulee and Pryor Mountain Wilderness Study Areas and the Burnt Timber and Big Horn Tack-On Wilderness Study Units would be exclusion areas if designated by Congress as wilderness.

Avoidance Areas (see Glossary)—The Petroglyph Canyon, Crooked Creek Natural Area, Asparagus Point, Bridger Fossil Area, Weatherman's Draw, Castle Butte, Steamboat Butte, Red Dome, Red Valley, Hoskins Basin Archeological District, Demi-John Flat Archeological District and the Bandit Site are important archeological or paleontological sites and scenic areas in the resource area. The Acton and Shepherd Environmental Education Sites are important to several school districts in the Billings area and receive heavy recreational use as well. The East and Red Pryor Mountains, Pryor Mountain Wild Horse Range, Bad Canyon Area, Beartooth Mountain Front (a 2 mile strip bordering the eastern boundary of Custer National Forest lands in the Beartooth Mountains) and public lands adjacent to the Clarks Fork, Stillwater, Yellowstone, Musselshell and Boulder Rivers are all important recreational areas because they provide hunting and fishing access and wild horse viewing, or contain significant visual resource values.

Windows (see Glossary)—Insufficient data prevented final identification of windows at this time.

Figure 1.1. General Setting Map



2. Unauthorized Agricultural Use

Unauthorized agricultural use, though not a significant problem in the resource area, will be addressed through permit, sale, lease or abatement based on case-by-case specifics.

3. Areas of Critical Environmental Concern (ACEC)

There are no identified ACECs in the resource area. If such areas are identified, and their resource values cannot be protected through other designations or management techniques, ACEC designation will be proposed.

4. Saleable Minerals

The resource area will attempt to meet the demand for these resources through sales, or free permits for home use, on a case-by-case basis, as in the past.

5. Locatable Minerals

Mineral exploration and development in the resource area will continue to be administered through the surface management regulations (43 CFR 3809).

6. Geophysical Exploration

Notices of intent for oil and gas exploration will be regulated in accordance with BLM policy.

7. Silvertip Creek Pollution

There is a pollution problem in the Silvertip Creek drainage from oil and gas operations in Wyoming. Lessee responsibilities need to be determined and, if necessary, a watershed activity plan developed, in coordination with other state and Federal agencies to resolve these pollution problems.

8. Public Land Parcels Not Leased Under Section 3 or Section 15 Grazing Lease Regulations

Several small tracts of land are topographically isolated, produce no forage (rock outcrops) or are surrounded by private land. These tracts are not grazed by livestock and will remain unallotted to livestock grazing.

9. Prairie Dog Control

Little data is available on the extent of the prairie dog population in the resource area. No requests for prairie dog control have been received and none are anticipated. If prairie dogs become a significant problem, the guidance contained in the State Director's Prairie Dog Policy Statement of April 1980, will be used to make a decision about controlling them.

10. No Grazing Management Alternative

In the Grazing Management issue, the no grazing alternative was considered and analyzed during the scoping phase of developing this resource management plan (RMP). This alternative was felt to be neither feasible or legally implementable and will not be further analyzed in this document, as the BLM is required by law to permit livestock use of public grazing lands. The scattered nature of the public land pattern in the Billings Resource Area and the cost of fencing public lands precludes implementing a no grazing alternative on an economically feasible basis. In addition, current range conditions do not warrant total removal of livestock, and in fact, such a policy degrades the ecological range condition. This does not preclude elimination of grazing by livestock on an individual allotment basis if range conditions warrant such eliminations or other uses warrant priority.

ISSUES CONSIDERED IN LAND USE PLAN ALTERNATIVES

A number of specific issues resulted from public comments at scoping meetings, brochure mailings and input from a number of groups and governmental organizations. Billings Resource Area employees also identified a number of issues. The following discussions present a brief overview of the issues included in the alternatives (Chapter 2) and analyzed in Chapter 4.

1. Grazing Management

In 1981, an inventory of soils and vegetation was completed to determine range condition and potential and to identify resource problems and conflicts (see Chapter 3, Vegetation). As a result of this inventory, plus public comments and professional knowledge of the rangeland resources of the resource area, the following grazing management issues and concerns were identified:

- A. Proper stocking rates are concerns on two allotments;
- B. Overall, 40% of the inventory area is in fair and poor condition and provides poor watershed cover, excessive runoff and low forage production for both livestock and wildlife;

- C. Accelerated erosion is associated with areas of poor and fair range condition. Soils in the 5-9 inch precipitation zone are particularly vulnerable to erosion due to sparse vegetative cover;
- D. Substantial acreage is covered with dense sagebrush (25% or more canopy cover). Improvement in range condition will be very slow without some reduction in the sagebrush canopy;
- E. Other areas are dominated by blue grama or fringed sagewort and their condition will improve very slowly without mechanical treatment;
- F. Poor livestock distribution is evident on many allotments and results in heavy use of favored areas and little use elsewhere;
- G. Noxious weeds, especially leafy spurge, are spreading on public lands in the resource area; and
- H. Old stands of crested wheatgrass are unproductive and need rejuvenation through some type of mechanical treatment.

2. Wild Horse Management

In 1981, a comprehensive inventory was conducted on that portion of the Pryor Mountain Wild Horse Range (PMWHR) in Montana to determine the current vegetative condition and to project the future vegetative production in response to management actions. The 1971-1972 Ocular Reconnaissance Range Survey will be utilized for those portions of the PMWHR in Wyoming. The following issues or concerns were identified in this inventory:

- A. The range condition on that portion of the PMWHR in Montana is less than satisfactory. The inventory indicated that 33% of the area was in fair range condition; 21% was in poor condition; and 7% was in good condition while 39% was unsuitable for grazing. Any improvement in range condition will be slow because of low site productivity, and would occur only after proper use of the vegetative resource. Those portions of the PMWHR in Wyoming are estimated to be in fair and poor condition. Range condition is a primary concern because of its obvious impact on the health and viability of the horse herd.
- B. The number of wild horses to be maintained under current range conditions is a primary concern.
- C. Existing management is not consistently maintaining wild horse numbers at a level compatible with other resource values. This is contributing to current and potential problems with watershed conditions, wildlife habitat and the management objectives of other agencies.
- D. The BLM is concerned that all lands now available to the wild horses remain available.

- E. The current cost of excessing wild horses exceeds \$690 per horse. This cost must be reduced because past and anticipated budget allocations will not permit a continuous and timely excess program. This occasionally results in a population that exceeds the carrying capacity of the horse range (as discussed in item C).

Alternatives in this resource management plan (RMP) will discuss habitat conditions in relation to maintaining healthy wild horses and wildlife. This plan will provide management direction on wild horses through discussion of the following: where will wild horses be maintained; how many will be managed; generally, what type of animal will be maintained; what level of management intensity is appropriate; and what provisions for public access are needed?

A Wild Horse Herd Management Area Plan will be developed in conjunction with the National Park Service and U.S. Forest Service after this RMP is completed and will incorporate the management direction provided by this plan.

3. Wildlife Management

Public lands within the resource area provide all or significant portions of key habitats for a variety of wildlife species. These habitats have been quantified utilizing the most current BLM data and information obtained from cooperating state and Federal agencies and is presented in Chapter 3. Habitat areas have been mapped for key species and are available for review in the Billings Resource Area Office.

The discussion of impacts to these habitat areas resulting from other resource proposals (presented in Chapter 4) has been presented from the standpoint of a worst case analysis, presuming that no wildlife-oriented constraints are imposed. The rationale for this approach is: (1) no site-specific crucial habitats or significant conflict areas of concern were identified in the scoping or public input phases of the RMP process by the general public, special interest groups or cooperating wildlife agencies and (2) other resource proposals, for the most part, could not be focused to definite site-specific areas of disturbance.

Wildlife habitat management will be given equal status in all phases of multiple use resource management within the resource area. Other uses of the public lands such as energy development, livestock grazing, rangeland improvements and recreational activities can potentially have significant adverse impacts to the wildlife resource. As site-specific proposals for any type of development are provided, a closely coordinated multi-disciplinary environmental assessment will be completed in each case, which will identify anticipated impacts to the wildlife resources and incorporate mitigating measures to reduce or eliminate these impacts. A list of standard stipulations and mitigative measures is presented in the Assumptions Section in Chapter 4 of this document.

4. Timber Management

There is a demand for timber products from BLM forested areas, though this demand is relatively small. Some forested areas may need protection from development and harvest due to the presence of other sensitive resource values. This RMP identifies these areas and recommends a course of action to resolve these conflicts.

5. Coal

The resource area contains known deposits of coal where surface mining or underground mining could occur. Before Federal coal can be considered for leasing, a decision must be made in a land use plan determining how much of the coal is acceptable for further consideration for leasing. This process involves applying four planning steps.

- A. Lands having potential for developing coal must be identified. Only coal of high or moderate development potential will be considered further.
- B. The lands identified as having potential for development are then examined for their suitability for coal leasing. Surface owners over split estate Federal coal are consulted to determine their views for or against surface coal mining on their lands. The BLM will try not to lease coal for surface mining in instances where a qualified surface owner is opposed to leasing coal on his land. If a significant number of surface owners are opposed to coal leasing for surface mining, a portion or all of the coal field may be blocked out and not considered further for leasing for surface mining during the life of this RMP. Surface owner opposition to coal mining may not be applied to deposits which would be mined by underground methods. The Department of the Interior cannot issue a lease for surface mining of Federal coal, where the qualified surface owner refuses to consent to such mining (Section 714, Surface Mining Control and Reclamation Act).
- C. The third planning step involves application of the 20 unsuitability criteria established by Federal regulations stemming from Section 522(a) of the Surface Mining Control and Reclamation Act of 1977 (SMCRA) and the Federal Coal Regulations at 43 CFR, Part 3400. In many cases, an individual criterion may not be fully applied due to lack of adequate information. The final result is a description of lands which may not be leased because a criterion (or criteria) applies, or that some lands will be considered available for further consideration for coal leasing pending collection of further environmental data. There is a general exemption stating that coal deposits to be mined by underground methods shall not be assessed unsuitable at the land use planning stage. Appendix 1.4 is a description of the coal unsuitability criteria.
- D. The last planning step is the application of multiple use management concepts which may eliminate additional areas from further consideration for leasing to protect other locally important or unique values not included elsewhere in the unsuitability criteria.

Coal lands which pass through these planning steps are described as acceptable for further consideration for leasing, pending further study, in some cases.

At this point, the leasing process splits. Public lands which are included in designated coal production regions must go through a detailed activity planning phase.

In accordance with the Federal Coal Management Program, the activity planning phase is carried out under the direction of a Regional Coal Team (RCT). The RCT for the Powder River Region, which includes the Bull Mountains, is made up of the BLM State Directors of Montana and Wyoming, the Governors of Montana and Wyoming and a chairperson who is a representative of the BLM Director.

Areas found acceptable for further consideration for leasing in the land use plan are further analyzed by the RCT. This process includes a call to industry for expressions of interest, tract delineation, site-specific analysis, tract ranking, selection of alternatives for leasing, a regional environmental impact statement (EIS) assessing impacts and mitigation measures for the various alternatives, and finally selection and scheduling of final lease tracts to be offered for sale.

Once a tract is leased, the lessee must comply with existing state and Federal regulations governing mining and reclamation. These include: Office of Surface Mining Reclamation and Enforcement regulations (30 CFR 700-899); Environmental Protection Agency regulations (40 CFR 0-1399); Council for Environmental Quality regulations (40 CFR 211); the Department of the Interior's Coal Management Program regulations (43 CFR 23 and 3400) and regulations promulgated under the Montana Strip and Underground Mine Reclamation Act and the Montana Environmental Policy Act.

Before mining can begin, a permit to mine must be obtained from the Montana Department of State Lands (DSL) and the Federal Office of Surface Mining (OSM). An EIS must be prepared by these agencies on the proposed mine at the time of permit application to address the impacts of the action.

The rest of the resource area lies outside any designated coal production region and may be leased upon application. An environmental assessment of the proposed lease area is prepared prior to any sales. Once a tract is leased, the lessee must comply with the Federal and state regulations governing mining and reclamation as stated above.

Under either process, a no lease sale for purposes of surface coal mining may occur in a split estate situation unless the qualified surface owner provides written consent to surface mining operations.

6. Oil and Gas Leasing

There are several producing oil and gas fields in the resource area. The activities associated with oil and gas exploration and production may impact scenic values, wildlife habitat, cultural resources and other land uses. The resource area currently operates its oil and gas

program as described in the Lewistown District Oil and Gas Programmatic Environmental Assessment (EA). All lands are currently considered leasable. Those lands designated as nonsensitive to oil and gas industry activities are leased directly from the Montana State Office with standard stipulations attached (see Appendix 1.5). These stipulations provide adequate protection for other environmental components.

When lease applications are received on lands designated as sensitive to industry activities, they are forwarded to the resource area for attachment of special protective stipulations. "No surface occupancy" may be a stipulation imposed on portions of a lease.

The largest block of unleased acreage in the resource area is the Pryor Mountain Wild Horse Range and its adjacent public lands, where until recently, industry interest has been low. This RMP will review the categories identified in the District Oil and Gas Programmatic EA to ensure that all potential adverse impacts have been considered and that full consideration is given to those areas that have significant potential for oil and gas exploration and development. Primary emphasis will be placed on the evaluation of oil and gas potential through exploration and development on the Pryor Mountain Wild Horse Range.

7. Land Tenure Adjustment

The isolated nature and small size of many parcels of public land in the resource area makes them difficult and uneconomic to manage. This particular land pattern is a result of two basic factors—scattered unappropriated public land and reacquired homesteads.

A. Scattered Unappropriated Public Land

Following the passage of the 1862 Homestead Act, vast portions of public land passed into private ownership. These lands were basically the more productive agricultural lands capable of sustaining a family farm. Some marginally or submarginally productive land was also homesteaded. The public lands that were left unappropriated were thus scattered in various sized parcels within large areas of privately-held lands.

B. Reacquired Homesteads

The "Dust Bowl" era of the 1920's and 1930's resulted in many submarginal dryland homesteads being abandoned. The Bankhead-Jones Farm Tenant Act of 1937 authorized Federal purchase of these privately-owned farmlands. The lands were then retired from agricultural production, seeded back to rangeland, and transferred to the jurisdiction of the General Land Office, which in 1946, along with the Grazing Service, became the BLM. These scattered lands, referred to as Land Utilization (LU) lands, are managed in the same manner as public land.

In order to address the above issue, the resource area developed retention and disposal criteria (see Appendix 1.3, Issue 7) to be applied to public lands within the Land Tenure Adjustment Area. The Land Tenure Adjustment Area was defined as an area of high public interest in a zone around Billings and along the Yellowstone and Stillwater Rivers. The initial inventory effort was focused in this area because of the lack of public access for recreation purposes along the rivers and because of the many scattered tracts near Billings.

Following development of the resource area's retention and disposal criteria, the BLM Montana State Office also published a list of retention and disposal criteria (see Appendix 1.6). These criteria are contained in the State Director Guidance for Resource Management Planning in Montana and the Dakotas (April, 1983). Any further use and application of land tenure adjustment criteria by the resource area will be from those contained in the State Director Guidance.

Individual tract maps and rationale for disposal and further study areas within the Land Tenure Adjustment Area are available for inspection at the BLM Billings Resource Area Office, 810 East Main, Billings, Montana.

If public lands are exchanged or sold, the mineral estate will, in most cases, be retained by the Federal Government, except where no minerals exist or where mineral exchanges are found to be in the public interest.

8. Classifications

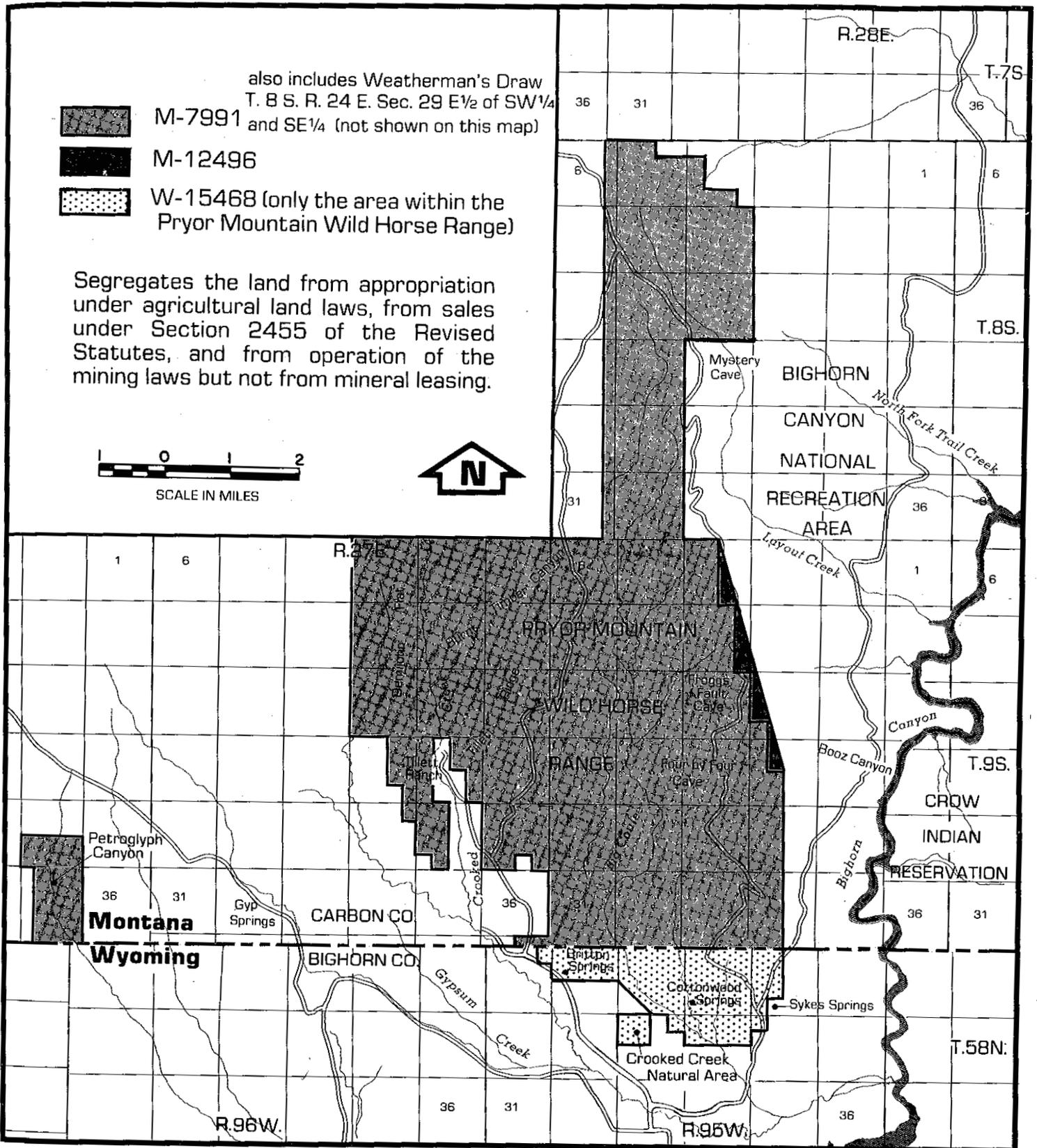
Three classifications made under the Classification and Multiple Use Act (C&MU) of 1964 currently exist in the Pryor Mountain area and portions of the Pryor Mountain Wild Horse Range (see Figure 1.2). A Washington Office direction dated June 18, 1981 (see Appendix 1.7, OAD No. 81-11) instructs that all C&MU classifications be eliminated by the end of fiscal year 1983 (FY-83). This directive does allow vital portions of certain classifications to be retained, if they contain important or unique values (improvements, cultural resources, etc.).

Classifications were identified as an issue in this RMP in order to obtain public input in the review process. Any comments received on the draft RMP concerning classifications will be incorporated into a separate review process. Review of these classifications were completed by the end of FY-83.

These classifications segregated the lands from appropriation under the agricultural land laws, from sales under Section 2455 of the Revised Statutes and from operation of the mining laws, but not from mineral leasing. As long as the withdrawals remained in effect, exploration for and development of commercial deposits of locatable minerals could not be allowed.

The Federal Land Policy and Management Act of 1976 repealed some of the agricultural land laws and Section 2455 of the Revised Statutes. The only agricultural land laws remaining are the Desert Land Entry and the Carey Act (see Glossary).

Figure 1.2. C&MU Classification



9. Recreation Access

There appears to be a demand for additional physical and/or legal access to public land to accommodate recreational users. This RMP identifies public lands where it's desirable to pursue public access. Emphasis has been placed on a zone surrounding Billings; the Yellowstone River; and the Bridger, Belfry, Warren Triangle Area.

10. Off-Road Vehicle Use

There is a demand for off-road vehicle (ORV) use as an activity by itself, as well as in conjunction with other uses of public lands. This demand is expected to increase, particularly in the Billings area as the population continues to grow. However, ORV use can conflict with other resource uses by impacting wildlife habitats and causing increased soil erosion by destroying vegetation. This RMP recommends areas where ORV use will be restricted or eliminated. Attention will be focused on areas near Billings and the Pryor Mountains.

11. Environmental Education

There are currently two sites designated as environmental education areas, one northeast of Shepherd, Montana and another northeast of Acton, Montana. The use of these sites has been declining while other uses that can conflict with environmental education use are increasing. This RMP determines the future direction for these sites in keeping with both BLM's and the public schools' present budgetary and personnel constraints.

12. Wild Horse Interpretation

Windrinker is a proposed observation/interpretive site in the Pryor Mountain Wild Horse Range. Guidelines for development have been outlined in a Windrinker Activity Plan, approved in 1980, on file at the Billings Resource Area Office. This RMP will determine whether such a development (and what level of development) is desirable in light of the amount of public interest and the costs and benefits of the proposal.

13. Wilderness

This RMP analyzes two wilderness study areas (WSAs) and two wilderness study units (WSUs) and makes recommendations about their suitability for inclusion in the National Wilderness Preservation System (NWPS).

Terminology to distinguish areas of less than 5,000 acres undergoing wilderness study from areas of more than 5,000 acres is used in this document. The Burnt Timber Canyon and Big Horn Tack-On Wilderness Study Units are less than 5,000 acres in size. Both are adjacent to other Federal agency lands recommended for wilderness designation and contain wilderness values

identified during the inventory phase of wilderness review. Washington Office permission has been obtained to study these units under authority provided in Section 202 of the Federal Land Policy and Management Act. However, it's not permissible to call these units wilderness study areas.

The remaining two areas, Pryor Mountain and Twin Coulee, are both over 5,000 acres and are WSAs. The Wilderness Study Policy requires that at least two alternatives be analyzed. The High Level Management Alternative recommends all the acreage in the four areas and units as suitable for wilderness designation, and the Low Level Management Alternative recommends none of the acreage as suitable. In addition, an alternative to continue existing management, and an alternative recommending only a portion of any individual area as suitable for wilderness, as well as the BLM Proposed Action for wilderness, were analyzed.



WILDERNESS STUDY PROCESS

This resource management plan/environmental impact statement considers wilderness suitability for four areas and units and is in response to Sections 202, 302 and 603 of the Federal Land Policy and Management Act of October 21, 1976. This law directed the Bureau of Land Management to inventory, study and then report to Congress, through the Secretary of the Interior and the President, the public lands suitable for inclusion in the NWPS.

In November 1978, BLM began the wilderness review by preparing descriptions of those areas of 5,000 or more roadless acres of public lands and those units of less than 5,000 acres contiguous to other wilderness or wilderness study areas. These wilderness inventory areas and units were reviewed by the public, intensively inventoried by BLM and reviewed by BLM's Montana State Director in 1979-80. The State Director then released his final decision designating those areas having the minimum characteristics of size, naturalness and outstanding opportunity for solitude and/or primitive recreation (Final Decision: Montana Wilderness Inventory, November 1980) as wilderness study areas or units.

The BLM has set the end of fiscal year 1986 for completing its wilderness studies and reporting wilderness suitability to the Secretary of the Interior. This document completes the study requirements for 4 of the 47 wilderness study areas in Montana. The Federal Land Policy and Management Act requires the Secretary to report his recommendations to the President by October 21, 1991. The President has until October 21, 1993 to send his recommendations to Congress, as only Congress can designate any of the study areas or units as wilderness.

The study was conducted in accordance with BLM planning regulations (43 CFR 1610) which provides for the issuance of national policy and procedural guidance. The BLM Wilderness Study Policy (*Federal Register*, 47:23, February 3, 1982), serves this purpose and is available at the Billings Resource Area Office. The policy establishes procedures to ensure that wilderness suitability recommendations are: (1) based on full consideration of all multiple resource values of public lands, (2) consistent with established national policy and (3) that all interested and affected members of the public and state and local governments are made aware of the study and given adequate opportunity to comment and otherwise be involved in the study process.

Input on the wilderness recommendations made in this document was solicited during public hearings held in Lovell, Wyoming and Billings, Montana in May 1983. **It is important to note that a separate wilderness EIS and suitability reports will be prepared as a result of this RMP/EIS planning effort. These documents will be forwarded to Washington D.C. for review before the proposals contained in this plan are submitted to the President and Congress.**

BILLINGS RESOURCE AREA RESPONSIBILITIES COMMON TO ALL LAND USE PLAN ALTERNATIVES

This RMP emphasizes the major issues in the Billings Resource Area. As a result, a number of resource programs, uses and processes are not completely described in this document. Their continued implementation does not result in significant environmental impacts, and in most instances, because of limited management capabilities, no feasible alternative management possibilities exist. These programs will continue to be a part of the resource area's responsibilities and should be considered as part of each land use plan alternative analyzed in this document, unless designated otherwise. These program elements are as follows:

1. Range Programs

The vegetation production data displayed and used in this EIS were collected during the 1981 field season, using accepted BLM methods. These data were needed to help determine areas suitable for continued livestock grazing and to provide the basis for developing a rangeland management program and management alternatives. The vegetation production data have also been used to identify and analyze impacts and mitigation of the proposed action and alternatives. Those reviewing this EIS should recognize the limitations of vegetation inventory data. While these data are adequate for purposes of general planning and analysis, they must be supported and augmented by the results of monitoring studies before making forage allocation decisions.

Grazing Allotment Categorization

In order to address grazing management issues in accordance with BLM policy, grazing allotments were grouped into categories based on resource conditions, potentials, conflicts and economic and management considerations. The purpose of the categorization process, called selective management, was to prioritize allotments so management efforts and funding could be directed to the areas of greatest need. The three categories are: "I" Improve, "M" Maintain, and "C" Custodial. The category name refers to the management objectives. The objective for the "I" category is to improve unsatisfactory conditions; for the "M" category, to maintain satisfactory conditions; and for the "C" category, to manage in a custodial manner. Custodial management indicates low levels of monitoring or improvement.

The primary criteria used in arriving at these categorizations were range condition, resource conflicts, economic feasibility to resolve conflicts and landownership pattern as it affects BLM manageability. Table 1.1 summarizes, by acreage, these allotment categories. This categorization is applied in all the alternatives described in Chapter 2 and analyzed in Chapter 4. Table 2.1 shows the management objectives or treatments for "I" allotments and methods to be used to achieve these objectives for each alternative. This table also shows the problems and conflicts in the "I" allotments.

TABLE 1.1: SUMMARY OF ALLOTMENT CATEGORIZATION

Category	Number	Acres	AUMs
Maintain	156	210,224	36,318
Improve	22	87,679	13,220
Custodial	215	101,485	12,899

Source: BLM, 1982

A summary of the allotments by category is contained in Appendix 1.8. The analysis in this document concentrates on BLM actions planned in the "I" category allotments. The BLM will continue to cooperate with ranchers, the Forest Service, the State of Montana and the Soil Conservation Service in improving grazing management on the "M" and "C" allotments containing small amounts of public land. If monitoring shows that an allotment in the "M" category is declining in condition or if conflicts arise, the allotment can be placed in the "I" category. Conversely, as "I" allotments improve, they may be placed in the "M" category.

Allotment Management Plans

The BLM intensive grazing management program is accomplished through allotment management plans (AMPs). These plans are prepared in consultation with livestock operators, state government and other interested parties. The level of grazing use, grazing systems, planned range improvements and monitoring efforts are described in each AMP. Table 1.2 summarizes the Montana State BLM policy concerning the level of monitoring by category. Allotment management plans are planned, or will be revised, for "I" category allotments and will be maintained for some "M" category allotments.

Allotment management plans will not be developed on "M" and "C" allotments that don't already have an AMP. Where a grazing management plan is developed on one of these allotments by the Soil Conservation Service or Forest Service and the rancher, BLM will assist as needed and may contribute to range developments on public lands. Many of the "C" allotments are small parcels of public land interspersed with large areas of privately-owned land. Bureau of Land Management supervision and monitoring will be minimal in these allotments. Examination of the small parcels will be made to determine sale, exchange or exchange pooling potential as budget and personnel permit.

Cooperative Management

The success of BLM grazing management is very dependent on the cooperation and efforts of the livestock operators. The ranchers are responsible for maintenance of most range improvements and expected to contribute to the original cost of many improvements. Their cooperation is very important in rangeland monitoring, particularly in providing actual livestock use data.

TABLE 1.2: MONTANA STATE BLM POLICY ON MONITORING BY MANAGEMENT CATEGORY

	Selective Management Category ¹		
	(M) Maintenance	(I) Improvement	(C) Custodial
Actual Use	Desirable	Required	Optional
Utilization	Optional	As needed to adjust or check carrying capacity during first grazing cycle.	Optional
Trend	Photo Evidence (desirable)	Photo evidence plus other data gathering techniques needed to monitor specific management objectives.	Photo Evidence (optional)
Climate	Optional	The effects of climate and annual fluctuations as related to management actions.	Optional

¹Monitoring is to be focused on the "I" category allotments and AMPs regardless of category.

Source: BLM, 1982

2. Public Affairs

The resource area has a considerable workload in public affairs associated with the Pryor Mountain Wild Horse Range, recreation, wilderness, wildlife management and other resource uses, and it's expected this workload will continue at or near current levels.

3. Wildlife and Fisheries Program

Fish and wildlife habitat for game and nongame species will be evaluated on a case-by-case basis as required in BLM's multiple-use planning process for all proposed actions. Each evaluation will consider the significance of the proposed action and the sensitivity of known habitats in the affected area. Stipulations will be attached to mitigate significant adverse impacts and assure compatibility of the action with the management objectives for fish and wildlife habitats.

Habitat and range improvement projects will be implemented where necessary to maintain and/or improve habitat conditions for game and nongame species. Range improvements will generally be designed to achieve both wildlife and range objectives. Range water developments will be designed to facilitate use by wildlife and water will be provided in allotments (including rested pastures) during seasonal periods of need for wildlife. Water sources will be located where significant conflicts over available vegetation will not occur. Existing fences will be modified and new fences built to facilitate the free movement of wildlife. Bureau of Land Management Manual 1737 standards will be utilized.

Food, cover, water and space objectives for wildlife will be incorporated into all existing and proposed new allotment management plans. Objectives will be specific to areas of key wildlife use.

Vegetative manipulation projects will be designed to minimize impacts to key wildlife habitats and preferably to improve them whenever possible. The Montana Department of Fish, Wildlife and Parks will be consulted in advance of all vegetative manipulation projects excluding timber harvest.

Animal damage control programs will be coordinated with the U.S. Fish and Wildlife Service and, in the case of aerial gunning requests, the Montana Department of Livestock will be consulted.

Management actions within floodplains and wetlands will include measures to preserve, protect, and if necessary, restore their natural functions (as required by Executive Orders 11988 and 11990). Management techniques will be used to minimize the degradation of streambanks and the loss of riparian vegetation. Bridges and culverts will be designed and installed to maintain adequate fish passage.

The preservation or enhancement of riparian and woody floodplain habitat types will be taken into consideration in developing all livestock grazing systems and pasture designs.

No surface disturbing or management activities will be allowed in habitats occupied by threatened or endangered species which could jeopardize the continued existence of such species. The Montana Department of Fish, Wildlife, and Parks and the U.S. Fish and Wildlife Service will be consulted prior to implementing projects that may affect habitat for threatened and endangered

species. If a "may effect" situation is determined through the BLM biological assessment process then consultation with the U.S. Fish and Wildlife Service (USFWS) will be initiated as per Section 7 of the Endangered Species Act of 1973, as amended. Areas displaying high potential or having documented historical threatened or endangered species habitat will be evaluated in consultation with the U.S. Fish and Wildlife Service for possible reintroduction in support of the endangered species recovery plan.

No coal reserves will be leased or developed within the resource area prior to completion of wildlife inventories and application of Unsuitability Criteria numbers 9 through 15. Appendix 1.9 summarizes data currently available, and inventories to be completed.

Public information and awareness programs will be presented to schools, service organizations and any other interested groups concerning the BLM's wildlife management program and objectives.

4. Fuel Wood Permits

The resource area will continue to provide fuel wood permits when possible.

5. Recreation Programs

The resource area's recreation program will continue to install and maintain road signs (approximately five new signs per year); cleanup and minor maintenance of seven recreation sites; conduct three to five tours of Mystery Cave (40-50 people per year); process an off-road vehicle permit for an annual cross-country motorcycle race; resolve user conflicts; provide free use permits; implement a national trail activity plan; and manage environmental education sites.

Recreation resources will continue to be evaluated on a case-by-case basis as a part of project level planning. Such evaluation will consider the significance of the proposed project and the sensitivity of recreation resources in the affected area. Stipulations will be attached as appropriate to assure maximum compatibility of projects with recreation management objectives.

6. Visual Resources

Visual resources will continue to be evaluated as a part of activity and project planning. Such evaluations will consider the significance of the proposed project and the visual sensitivity of the affected area. Stipulations will be attached as appropriate to assure maximum compatibility of projects with management objectives for visual resources.

7. Cultural Resources

Cultural resources constitute a BLM program in their own right. The BLM's objective is to manage them in a stewardship role for public benefit. The Department of Interior has issued instructions setting forth this management structure through a "use evaluation" system. The purposes of the system are for the analysis of scientific and socio-cultural values of cultural resources, to provide a basis for land use allocation of cultural resources, to make cultural resources an important part of the planning system and to identify information needed when existing documentation is inadequate to support a reasonable cultural resource-based land use allocation.

The evaluation of cultural resources requires the consideration of actual or potential use of individual sites or properties within the following categories:

- A. **Socio-cultural Use.** This category refers to the use of an object (including flora and fauna), structure or place based on a social or cultural group's perception that the object has utility in maintaining the group's heritage or its existence.
- B. **Current Scientific Use.** This category refers to a study or project in progress at the time of evaluation for which scientists or historians are using a cultural resource as a source of information which will contribute to the understanding of human behavior.
- C. **Management Use.** This category refers to the use of a cultural resource by the BLM, or other entities interested in the management of cultural resources, to obtain specific information (other than basic inventory data) needed for the reasonable allocation of cultural resources or for the development of effective preservation measures. This category includes study plots allocated to examine specific impacts and deterioration.
- D. **Conservation for Future Use.** This category refers to the management of cultural resources by segregating them from other forms of appropriation until specific conditions are met in the future. Such conditions may include, but are not limited to, development of research techniques which are presently not available, or the exhaustion of all other resources similar to those represented in the protected sample. The category is intended to provide long-term preservation and protection of select cultural resources.
- E. **Potential Scientific Use.** This category refers to the potential use of a cultural resource as a source of information which will contribute to the understanding of human behavior, utilizing research techniques currently available.

Significant sites or districts will continue to be managed for their cultural resource values. Management will emphasize appropriate site use through the development of specific activity plans which identify cultural resource protection and use objectives, establish the actions BLM must take to achieve its objectives and outline procedures for evaluating accomplishments (see Appendix 1.10).

8. Fire Policy

It's BLM policy that the Billings Resource Area respond to all fires on or threatening public lands.

The resource area employs two 3-man crews from approximately June 15, through September 15. One crew is stationed at the resource area office in Billings, Montana and the other is located at the BLM warehouse in Bridger, Montana. Firefighting equipment consists of two 200-gallon pumping units mounted on two 1-ton trucks and enough hand equipment for four 20-man fire crews.

The BLM has an operating plan in effect from June 15 to September 15, with the Red Lodge Forest District of the Custer National Forest. Under this plan, the BLM will provide initial attack on all fires in the Pryor Mountain area.

Written agreements with local fire departments in Bridger, Custer, Worden, Shepherd, Huntley, Belfry and Absarokee, Montana, state that these departments will provide initial attack assistance on fires in their areas for up to 6 hours, or until the arrival of BLM fire crews.

A written agreement for fire control cooperation also exists between the State of Montana and the BLM Montana State Office, Billings. The primary objective of this agreement is to provide for maximum cooperation for fire control efforts in areas of intermingled or adjacent state and Federal land jurisdictions. Fire control activities between the state and BLM are decided on an annual basis through written operational plans.

In addition, the BLM, State of Montana, Department of State Lands, Division of Forestry and cooperating counties throughout Montana maintain an agreement whereby the state coordinates with the counties to supply equipment, training and manpower for fire suppression from the BLM. A cooperative agreement with the state or a direct agreement with BLM is necessary before BLM can respond to calls for fire control assistance on non-BLM administered lands. Counties with cooperative agreements through the state within the Billings Resource Area are Wheatland, Golden Valley, Yellowstone, Big Horn, Stillwater and Sweet Grass.

9. Lands Programs

Most of the present lands program (approximately 30 cases per year) is generated through user-initiated proposals or applications. Inquiries and proposals are received from federal, state, and local governments, private companies, organizations, and individuals. Proposals are evaluated on a case-by-case basis, and include the following types of actions:

- A. Right-of-way applications are received from individuals or companies interested in acquiring access across, or locating facilities on, public land.
- B. The Federal Land Policy and Management Act authorizes short-term permits or long-term leases for uses of the public land including agricultural use, recreational use, facility siting, sanitary landfills, etc.
- C. The Recreation and Public Purposes Act authorizes BLM to administer lease or lease option agreements for use of the public land for public purposes, such as parks, fishing access sites, campgrounds, rodeo grounds, rest areas, etc.
- D. Proposals to dispose of public land by sale or exchange and acquire surface or subsurface acreage are received mostly from private individuals and companies although the BLM may initiate some proposals.

All lands cases processed within the resource area are subjected to site-specific analysis within the Environmental Assessment/Land Report (EA/LR). The Federal Land Policy and Management Act and BLM regulations require that the EA/LR show that all recommended actions are not only consistent with existing land-use plans, but also that the public interest is well served by the proposal.