

CHAPTER 5

CONSULTATION AND COORDINATION

Consultation and coordination has been an important part of this planning effort since its beginning in 1984. Public meetings, informational mailings and individual contacts with other governmental agencies, Native American tribes, interest groups and the general public were used to gather *comments* for this RMP. This *information* helped identify the issues, criteria, and alternatives discussed in this document. Coordination and consultation continued through the review of the *draft Resource Management Plan/Environmental Impact Statement (RMP/EIS)* and preparation of the final *RMP/EIS*.

Public meetings to gather public *opinion* were held at the alternative development stage and again after the draft RMP/EIS was published. *The following* public meetings (including location, date and the number of public attending) *were held during the alternative development process*: Great Falls (9/29/86-6); Shelby (9/30/86-19); Chester (10/1/86-6); Lewistown (10/1/86-5); Havre (10/2/86-17); Fort Benton (10/7/86-10); Malta (10/8/86-3); and Winifred (10/9/86-3). *The following* public meetings (including location, date and the number of public attending) *were held to gather comments on the draft document*: Havre (7/13/87-11); Great Falls (7/14/87-6); Shelby (7/15/87-15); Chester, (7/16/87-11); Lewistown (7/20/87-12); and Fort Benton (7/21/87-4).

Those aspects of public land management that received little comment, or were subject to administrative or legal constraints, were eliminated as potential planning issues, thus streamlining the process.

The Bureau of Land Management (BLM) coordinated and consulted with federal, state, and local agencies once *the* tentative alternatives were completed to identify conflicting management objectives and potential impacts to adjacent land managing agencies.

Consultation under Section 7 of the Endangered Species Act has been *completed* with U.S. Fish and Wildlife Service (USFWS). The final RMP/EIS contains the Biological Assessment and USFWS Biological Opinion (*see Appendix 4.2*) on the impacts from the RMP/EIS to threatened and endangered species.

PUBLIC INVOLVEMENT

A Notice of Intent, formally announcing the beginning of the planning process, was published in the *Federal Register* in December, 1983. The public has been informed of and involved in the planning process through *Federal Register* notices, news releases, direct mailings, and public meetings.

These releases ranged in subject matter from general announcements at the beginning of the planning process to dates and places of specific public meetings and requests for public comments. Public participation activities are listed chronologically in Table 5.1. Complete records of public comments and involvement are on file in the Lewistown District Office.



Consultation & Coordination 5

**TABLE 5.1
PUBLIC INVOLVEMENT**

Date	Action
December 1983	Notice of Intent to prepare an RMP/EIS for the West HiLine was published in the Federal Register.
June 1984	Issue brochure was sent to 596 agencies, organizations and individuals.
July 1984	Public meetings to identify issues were held in Havre and Great Falls, Montana.
June 1985	Federal Register Notice requesting coal or other resource information.
March 1986	Press release to local media identifying the availability of the District Manager's concept and planning criteria.
August 1986	Press release to local media identifying expansion of planning boundaries and alternatives.
September 1986	Federal Register Notice filed, supplementing Notice of Intent to expand planning area (now includes entire UMNWSR corridor and associated public lands). Letters (1500) sent to those on mailing list requesting comments on alternative brochure and the recently added river management issue. Letters also informed public of upcoming public meetings. Press release to local media identifying the availability of alternative brochures and upcoming public meetings.
September/October 1986	Public meetings held in eight west HiLine communities to gather information on alternative development.
October 1986	Briefings held for Rocky Boy and Blackfeet tribes and Governor's Office.
May 1987	Press release to local media identifying the availability of the draft RMP/EIS. Federal Register Notice of Availability.
June 1987	Press release to local media identifying the availability of the draft RMP/EIS and upcoming public meetings. Federal Register, EPA Notice of Receipt, beginning the 90 day review period.
July 1987	Public Meetings.
September 1987	Public comment period on the draft RMP/EIS closed.

CONSISTENCY

The BLM's planning regulations require that resource management plans be "consistent with officially approved or adopted resource related plans of other federal agencies, state, and local governments, and Indian tribes, so long as the guidance and resource management plans are also consistent with the purposes, policies, and programs of federal law, and regulations applicable to public lands..." (43 CFR 1610.3a).

All federal, state, local *agencies* and tribal councils *were* requested to review the *draft RMP/EIS* document for inconsistencies with their plans and inform the BLM of any inconsistencies. *The Governor of Montana will complete his consistency review by the close of the protest period.*

DISTRIBUTION LIST

BLM requested comments from interest groups and individuals; from federal, state, and local agencies and Native Americans. The following is a partial list of organizations and agencies that received this document.

County Commissioners and Boards of Planning

Blaine County Commissioners
 Chouteau County Commissioners
 Fergus County Commissioners
 Glacier County Commissioners
 Hill County Commissioners
 Liberty County Commissioners
 Phillips County Commissioners
 Toole County Commissioners

Montana Chamber of Commerce
 Fort Benton Chamber of Commerce
 Havre Chamber of Commerce
 Malta Chamber of Commerce
 Lewistown Chamber of Commerce

Blaine County Conservation District
 Chouteau County Conservation District
 Glacier County Conservation District
 Hill County Conservation District
 Liberty County Conservation District
 Toole County Conservation District

State

Honorable Ted Schwinden
 Department of Health and Environmental Sciences
 Dept. of Community Affairs
 Dept. of Natural Resources and Conservation
 Department of State Lands
 Department of Natural Resources
 Department of Fish, Wildlife & Parks
 State Historic Preservation Office
 State Planning Coordination Office

Congressional

Honorable Max Baucus
 Honorable Ron Marlenee
 Honorable John Melcher
 Honorable Morris K. Udall Committee on Interior and Insular Affairs
 Honorable Pat Williams
 Honorable James A. McClure Committee on Commerce & Natural Resources

Federal Agencies

Advisory Council on Historic Preservation
 Bonneville Power Administration
 Bureau of Indian Affairs
 Fort Belknap Tribal Council
 Blackfeet Tribal Council
 Rocky Boy Tribal Council
 Fort Peck Tribal Council
 Nez Perce Tribal Council
 Salish and Kootenai Tribal Council
 Bureau of Mines
 Bureau of Reclamation
 CMR National Wildlife Refuge
 Department of Army Corps of Engineers
 Department of Energy (Western Area Power Administration)
 Department of Transportation
 Environmental Quality Council
 Federal Aviation Administration
 Federal Highway Administration
 Federal Housing Administration
 National Park Service
 Soil Conservation Service
 United States Department of the Interior
 Missouri River Basin Commission
 Field Solicitors Office
 US Environmental Protection Agency
 US Army Corps of Engineers
 US Dept. of Commerce
 US Fish & Wildlife Service
 US Forest Service
 North Central Forest Experiment Station
 US Geological Survey

Special Interest Groups

American Fisheries Society
 American Horse Protection Assoc.
 American Mining Congress
 American Canoe Assoc.
 American River Recreation Assoc.
 American Rivers Conservation Council
 Billings Rod & Gun Club
 Blood Indian Tribal Council, Alberta, Canada
 Defenders of Wildlife
 Fergus County Livestock Association
 Fishing & Floating Outfitters Association of Montana
 High Country News
 Humane Society of the US
 Independent Petroleum Assoc. of Mtn. States
 Intermountain Forest Industry Association
 International Society for the Protection of Mustangs and Burros

Izaak Walton League of America
 Lewistown Rod & Gun Club
 Laurel Rod & Gun Club
 Lehmann and Associates
 Missouri River Canoe Rental
 Missouri Basin Inter. Ag. Comm.
 Missouri River Outfitters
 Mitchell Grazing Association
 Montana Association of State Grazing Districts
 Montana Automobile Assoc.
 Montana Coal Council
 Montana Council of Cooperatives
 Montana Farm Bureau
 Montana Farmers Union
 Montana Geological Society
 Montana Historic Society
 Montana Petroleum Association
 Montana Public Lands Council
 Montana River Outfitters
 Montana Stockgrowers Association
 Montana Wilderness Association
 Montana Woolgrowers
 Montana Wildlife Federation
 National Audubon Society
 National Coal Assoc.
 National Council of Public Land Users
 National Wildlife Federation
 Natural Resource Defense Council, Inc.
 Nature Conservancy
 Nevada Outdoor Rec. Assoc., Inc.
 Northern Montana Oil & Gas Assoc.
 Northern Plains Resource Council
 Northwest Mining Assoc.
 Overthrust Foundation
 PA Coop Wildlife Research Unit
 Public Lands Institute
 Reserved Water Rights Compact Comm.
 Rocky Mountain Oil & Gas Association
 Sierra Club
 Signal Butte Grazing Assoc.
 Society for Range Management
 Square Butte Grazing Assoc.
 The Wilderness Society
 The Wildlife Society
 Trout Unlimited
 Western Environmental Trade Assoc.
 Western River Guides Assoc.
 WIFE
 Wilderness Institute
 Wild Horse Organized Assoc.
 Wild Horse Research Farm
 Yellowstone Valley Audubon Society
 Yellowstone Snowmobilers Assoc.

Other Businesses and Organizations

ABN Ranch Inc.
 AIRO Drilling Corp.
 Amax Exploration
 American Colloid Co.
 American Petrofina Co. of Texas
 Anaconda Minerals Co.
 Amoco Production Co.
 ARCO Coal Co.
 Arrowhead Farms
 Atlantic Richfield Co.
 JR Bacon Drilling Inc.

Bailey Land & Livestock Inc.
 Balcron Oil Co.
 Beren CIRO
 Big View Ranch
 Brummer Farm
 Exxon USA
 Blaine Cty Abstract Co.
 Branch Oil & Gas Inc.
 Bronco Exploration
 Buckhorn Petroleum Co.
 Gale Butterfield Inc.
 Carson Min. Consult. Inc.
 Celsius Energy Corp.
 Cenex
 Century Oil & Gas
 Champlin Petroleum Co.
 Chevron USA Inc.
 Chevron Resources Co.
 Christofferson Land & Cattle
 Chippewa-Cree Tribal Business Council
 Cities Service Oil & Gas Corp.
 City Oil Company
 Eastern Montana College
 CNG Producing
 Coal Creek CSGD
 Coastal Oil & Gas Corp.
 Comanche Drilling Co.
 Conoco Inc.
 Fed. Coal Acquisition Group
 Croft Petroleum Company
 Cronk Ranch Inc.
 Crown Central Petroleum Corp.
 Czar Resources
 D A S Resource Ventures Inc.
 Damson Oil Corp.
 Davis Oil
 Davies Ranch
 Energy Development Board of Mercer County
 DEPCO Inc.
 Doane Western Co.
 Energy Mining & Minerals
 Eastern American Energy Corp.
 Elenberg Exploration Inc.
 Elloam Grazing Assoc.
 Energetics Inc.
 Energy Fuels Corp.
 Energy Reserves Group Inc.
 Eureka Grazing Assoc.
 Exxon
 Falcon-Colorado Expl. Inc.
 5 H Cattle Company
 Flying J Exploration & Production Inc.
 Four Corners Supply Inc.
 Freeport Exploration Co.
 Frontier Exploration Company
 Fuel Resources Dev. Co. FUELCO
 Fulton Producing Co.
 General Agriculture Corp.
 GEO Research Inc.
 Gordon Cattle Company
 Grass & Sons, Inc.
 Great Northern Drilling Co. Inc.
 Gulf Oil Exploration & Production Co.
 H & H Land Co.
 Halliburton Co.
 Hancock Enterprises
 Hardrock Oil Co.

Hasquet Prairie Co.
 Hill County Electric Coop Inc.
 HKM Associates
 Homestake Oil & Gas
 Huartson Ranch
 Husky Oil
 Investestate
 IX Ranch Company
 Jack Grynberg & Assoc.
 J M Resources Inc.
 Juniper Oil & Gas
 Kalanick Ranch Inc.
 Kaun Grain & Livestock Co.
 Knottnerus Inc.
 Lazy K 6 Ranch Inc.
 Lenington Farms Inc.
 Lewis & Clark Tours
 Lightning Productions Inc.
 Lincoln Farms Inc.
 Lonesome Prairie Farms Inc.
 Lost Ridge Land & Cattle
 Louisiana Land & Exploration Co.
 Love Oil Co Inc.
 Luff Exploration Co.
 Lunds Heart Y Ranch
 MacDonald Farms Inc.
 Maddox Ranch Co.
 Marathon Oil
 Marquis Petroleum Corp.
 Marias River Electric Coop Inc.
 McCann & Son Inc.
 Lawrence J McCarthy & Assoc.
 McCartney Lands & Minerals
 McColly Ranch Inc.
 Meissner Ranches Inc.
 Meridian Land & Mineral Co.
 Meridian Oil Inc.
 Mariah Oil & Gas Inc.
 Minden Oil & Gas Inc.
 Minerals Exploration Coalition
 Mitchell Ranch
 Mobil Oil
 Montana Flycast Guide Service
 Montana Env. Information Center
 Montana Pacific Oil & Gas Co.
 Montana Power Co.
 Monterray Petroleum
 Mountain States Petroleum Corp.
 Murphy Oil USA Inc.
 N Hanging 5 Ranch
 Nace Ranch Co.
 North American Coal Corp.
 North American Resources
 Northern Natural Gas Co.
 Northern Pacific Oil & Gas
 Northern Telephone Coop. Inc.
 P & M Petroleum
 Petrie Ranch Partnership
 Petro-Lewis Corp.
 Petroleum Corp. of America
 Phillips Petroleum Co.
 Pugsley Ranches Inc.
 Quintana Petroleum Corp.
 Ray Harrison Drilling
 Ranck Oil
 Red River Oil & Gas Inc.

Robinson Land Company
 S & J Operating Co.
 S & W Petroleum Consultants Inc.
 S Bar B Ranch Co.
 Sand Creek Ranch
 Schellin Ranch Co.
 Schiff & Jackson Oil
 Shell Oil Company
 SHADCO
 Siebrasse Farms Inc.
 Sierra Oil & Gas Co.
 Sky Ranch
 SOHIO Petroleum Co.
 Somont Oil Co. Inc.
 Stillwater PGM Resources
 Stovall Oil Co.
 Stroock Leasing Corp.
 Stuker Land Co Inc.
 Sunburst Exploration Inc.
 Tenneco Oil Exploration & Production
 Terra Resources Inc.
 Texaco
 Texas Gas Expl. Corp.
 The Guide & Outfitter
 Three River Telephone Coop. Inc.
 Triangle Telephone Coop Assoc. Inc.
 Tricentrol United States
 True Oil Co.
 Union Oil Company
 Union Oil Company of California
 United States Energy
 Universal Gas Inc.
 Ed Vanderpas Oil
 Weaver Cattle Co.
 Western Energy Co.
 Western Natural Gas Co.
 Western Reserves Inc.
 Westmoreland Resources
 Wilcox Family Partners
 Williston Basin Interstate Pipe Co.
 Wood River Ranch
 Worrall & Sons Inc.
 Xeno Inc.
 Yellowstone Petroleum Inc.

The RMP/EIS is available at county libraries. In addition the draft RMP/EIS has been mailed to an additional 300 individuals.

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RESPONSE TO PUBLIC COMMENTS

The following are BLM's responses to each identified comment or question concerning the draft West HiLine RMP. Each response is numbered to correspond with the appropriate comment or question.



UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
Endangered Species, Field Office
Federal Bldg., U.S. Courthouse
301 South Park
P.O. Box 10023
Helena, Montana 59626

IN REPLY REFER TO:

M.02(I) Lewistown Dist./
West HiLine RMP

DM	L & RR
ASSOC. DM.	PA
ADMIN.	RVR
P/EA	MIN
OPR	JUD
USDI JUN 11 87 BLM	
RECEIVED LEWISTOWN, MT	
ACTION	

June 10, 1987

MEMORANDUM

To: District Manager, Bureau of Land Management, Lewistown District
Office, Lewistown, MT

From: Acting Field Supervisor, Fish and Wildlife Service, Fish and Wild-
life Enhancement, Helena, MT

Subject: Biological Assessment for the West HiLine Resource Management Plan

We have reviewed the subject biological assessment and your "no effect" determination for Federally listed species which may occur in the planning area. We concur with your determination that the preferred alternative will not affect the bald eagle (Haliaeetus leucocephalus), peregrine falcon (Falco peregrinus), black-footed ferret (Mustela nigripes), or the piping plover (Charadrius melodus).

Likewise, we concur that the management prescriptions for the Kevin Rim and Sweet Grass Hills have long-term potential for beneficial effects for raptors, including peregrine falcon recovery. We agree with protecting the long-term potential of this habitat for peregrine falcons, even if a peregrine hacking program may not be implemented in this area in the immediate future. The ongoing recovery of the peregrine falcon will enhance the potential of natural reestablishment of wild peregrine falcons eyries in the area. We support and commend your efforts to protect historical or potential peregrine eyries and the potential for use of these areas by peregrine falcons in the future.

We appreciate the quality of the biological assessment you provided. We found it easy to understand, well organized and clear and direct in its presentation of information about the Bureau's resource goals and responsibilities to protect listed species and enhance their recovery. We thank you and your staff for your efforts to address listed species and the issues related to implementing the preferred alternative of the Plan.

Kon Crote

cc: State Director, BLM, State Office, Billings, MT
Acting State Supervisor, FWS, FWE/ES, Billings, MT

RAC/clh

"Take Pride in America"

UNITED STATES GOVERNMENT

memorandum

DATE: JUN 15 1987

REPLY TO
ATTN OF: Division of Programs, Land and Minerals, Code 360SUBJECT: West HiLine Draft Resource Management Plan/Environmental Impact
Statement (RMP/EIS)

TO: District Manager, Bureau of Land Management, Lewistown District Office

From: Billings Area Director

1 This office has reviewed the subject draft Resource Management Plan/Environmental Impact Statement (RMP/EIS). There are a few comments we would like to make. We believe we have the latest errata sheet which was attached to your June 3, 1987, letter. There was no mention of what we feel is an error in the abstract. The last sentence of the third paragraph states: "Alternative D, The Preferred Alternative reflecting a balance of Alternatives C and D". Alternative D cannot be a combination of C and D. Such a combination would make Alternative D actually the same as Alternative C. We assume Alternative D is actually a combination of Alternatives B and C.

55 Regarding the actual content of the Alternatives, the focus should be the consolidation of public lands, so that they are accessible for multiple use by the public as well as more successfully managed. Alternatives B, C, and D call for disposal of public land. There is an "emphasis" on exchange, but the RMP/EIS does not mandate exchange. As you are aware, there is a paucity of public land in eastern Montana as it is. Disposal of more of this land can only make a poor situation worse. Alternative B states that Bureau of Land Management (BLM) land patterns would be "blocked up" in the HiLine area and the Rocky Mountain Front. This could be accomplished by exchanges. However, exchanging public land in eastern Montana for Rocky Mountain Front land does not help the public in eastern Montana. The eastern Montana land is near and/or adjacent to the Blackfeet, Rocky Boy's and Fort Belknap Indian Reservations.

A decline in the quantity of public lands in this area will exert more pressure on the reservations. This pressure will be manifested as people seeking land for off-road vehicles, hunting, fishing, and other recreation activities.

The three Alternatives B, C, and D all address enhancing management options for grazing by consolidation of BLM lands. Grazing is one of the principle uses of public land. However, land used primarily for recreation is beneficial to more of a diversity of people, and in essence used by the "public". If grazing land consolidation is to be accomplished, it should be emphasized that it should not be at the expense of recreation lands.

No. 1

The abstract has been revised.



Buy U.S. Savings Bonds Regularly on the Payroll Savings Plan

OPTIONAL FORM NO. 10
(REV. 7-76)
GSA FPMR (41 CFR) 101-11.6
5010-112

Federal administration of lands is all that has protected some lands in native vegetation from eolian and water induced erosion caused by farming unsuitable soils. Alternatives B, C, and D all mentioned that a change in land administration from Federal to private would change vegetation types. A high degree of scrutiny will have to be used in land exchanges and disposal to avoid the ramifications associated with farming native vegetation sites.

2 | Our next comment regards the potential disposal of land by sale, described in Alternatives B, C, and D. We request that the Indians on the reservation be offered the land adjacent to the reservations with the right of first refusal. The rationale for this solicitation lies in the fact that this land was aboriginal land ceded to the United States through treaties. As such, the various tribes should have the option of reacquiring the land and reestablishing the reservation.

3 | The section pertaining to Upper Missouri National Wild and Scenic River Management leaves us with a question. Under Concession Management, services such as outfitting, boat rental and campground/maintenance would be allowed. Is there a prioritization or methodology to determine who will be granted a license or concession permit? Also, how many concessions of the same nature would be allowed?

4 | The minerals EMPHASIS AREA states that under Alternatives C and D, a protective withdrawal on the Sweet Grass Hills could result in drainage of Federal hydrocarbons. If surface and mineral rights are "blocked up" in this area, there would not be state or fee lands on which offending wells could be drilled. If producing wells exist, the field should be developed anyway to maximize recovery of the natural resource, and royalties to the U.S. Government.

5 | The Summary Impacts Table on page 36-40 could use some entries in numerous grid blocks which are presently vacant. If they are the same as another column they should be designated as such. An example is under OFF-ROAD VEHICLE MANAGEMENT, Wildlife and Fisheries, Alternatives A and C.

6 | Under Mineral Resources, Coal, (page 45) it is stated that "Shippable deposits in the planning area would be localized in relatively rare areas. . . with thin overburden (<0')." No overburden on the coal will lead to oxidized and weathered coal which is not shippable or strippable (which we think this section refers to). The content of the paragraph is correct, stating that localized seams are passed over in favor of the more economically strippable coal in the Powder River Basin.

This office is pleased that the RMP/EIS addresses the cultural resources of the area. These include areas of historic and archeological significance. The Native American religious sites in the area are not replaceable. The Washington Office and State Director's

No. 2

The public land sale regulations do not have provisions for establishing a preference right for any individual. The regulations do allow, at the discretion of the BLM, the latitude to establish modified or direct public sales. These sales would allow an individual(s) to acquire public land by meeting the highest bid (modified) or without competition (direct sale). The use of modified and direct sales is decided on a case-by-case basis.

No. 3

The guidelines and criteria to determine if a concession permit would be granted and how many permits would be allowed will be addressed in the Coordinated Activity Plan for the UMNWSR which is scheduled for revision. The public will have an opportunity to comment on proposed criteria for private sector initiatives at that time.

No. 4

The protective withdrawal would only be pursued under Alternative C. The withdrawal would be applied to the federal mineral estate underlying the ACEC.

No. 5

The vacant blocks in this table indicate that impacts would be minor or would not occur and are intended to make this table easier to read.

No. 6

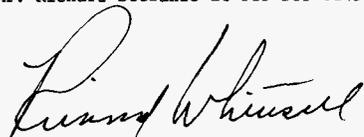
Shippable should have read strippable. This section on coal resources has been revised and this sentence has since been deleted. For more information please refer to the errata entry for page 45, column 1, paragraph 6.

-3-

Land Tenure Adjustment guide establishes the criteria for acquisition and disposal of land parcels. As such, we are confident that prior to disposal, the land will be archeologically surveyed and high research value, scarce or unique sites will be retained.

The brief review we have accomplished indicates that neither the Consumptive Use emphasis option (Alternative B) nor Alternative C, the protection emphasis option is in the public's best interest. A combination of the alternatives on a nearly site or geographically specific basis is most beneficial. Refinements in the combination may be helpful.

Thank you for the opportunity to comment on this RMP/EIS. Questions or clarification can be directed to Mr. Richard Stefanic at FTS 585-6145.

A handwritten signature in cursive script, appearing to read "Leonard Whitsell". The signature is written in dark ink and is positioned centrally below the typed text.

United States Soil
 Department of Conservation
 Agriculture Service

Federal Building, Room 443
 10 East Babcock Street
 Bozeman, MT 59715

June 18, 1987

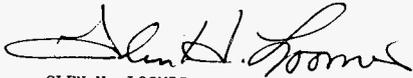
Mr. Wayne Zinne, District Manager
 Lewistown District Office
 Bureau of Land Management
 Airport Road
 Lewistown, MT 59457

Re: West HiLine RMP/EIS Draft

Dear Mr. Zinne:

We have reviewed the above document and have no comments to offer.

Sincerely,



GLEN H. LOOMIS
 State Conservationist

cc: Ron Batchelor, State Biologist, SCS, Bozeman, MT

DM _____	L & RR _____
ASSOC-DM _____	PA _____
ADMIN. _____	RVR _____
P/EA _____	MIN _____
OPR _____	JUD _____
USDI JUN 23 1987 BLM	
RECEIVED LEWISTOWN, MT	
ACTION _____	

Meridian
Minerals Company
 A Subsidiary of Burlington Northern Inc.

BM	L & RR
ASSGE-DH	PA
ADMIN.	RVR
P/EA	MIN.
OPR	JUG.
V/SCH JUN 29 1987	
RECEIVED	
LEWISTOWN, MT	
ACTION:	

Mr. Wayne Zinne
 District Manager,
 Lewistown District
 Airport Road
 Lewistown, MT 59457

Dear Mr. Zinne:

Meridian Minerals Company is a mining company with exploration interests in Montana. We have reviewed your current West HiLine RMP/EIS and wish to address the management alternatives. We believe that as much land as possible should be left in multiple use classification. Meridian is strongly in favor of Alternative A.

Should you wish to discuss this further or require additional information from Meridian, please do not hesitate to call me at (303) 930-9274.

Yours truly,

Charles Rech

C.W. Rech
 Director
 Land and Government Affairs

CWR/pjh:4692I



United States Department of the Interior

BUREAU OF MINES
 WESTERN FIELD OPERATIONS CENTER
 EAST 360 3RD AVENUE
 SPOKANE, WASHINGTON 99202

June 26, 1987

DM	PA & RR
ASSOC. DM	PA
ADMIN.	EYE
P/EA	MIN
OPR	JUD
USDA JUN 23 1987 DLM	
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Memorandum

To: Wayne Zinne, District Manager--Lewistown District Office, Bureau of Land Management, Lewistown, Montana

From: Supervisor--Mineral Issues Involvement Section, Branch of Engineering and Economic Analysis

Subject: Draft Resource Management Plan/Environmental Impact Statement (RMP/EIS) for the West HiLine Planning Area of the Lewistown District, Montana

69 7 | We have reviewed the West HiLine DEIS and found it nearly adequate. Although minerals and their management are discussed in the text, there are no maps which show areas of locatable, leasable (particularly oil and gas), or salable mineral potential. These areas need to be identified on large scale maps along with their associated commodities.

8 | The discussion of minerals should include present activity in and near the areas of concern. This information will allow us a better understanding of the status of mineral activity in the area and the effect the proposed plans may have.

We concur with your preferred alternative and thank you for the opportunity to review your documents.

D. Ardy P. Banister
 D. Ardy P. Banister

No. 7

The map on page 44 of the draft RMP/EIS shows oil and gas development potential. Additional maps showing locatable potential have been included in this document. A salable mineral potential map was not prepared. Locatable and salable mineral potential is addressed in the errata entry for page 45, column 2, paragraphs 1, 2, 3 and 4.

No. 8

BLM revised the text to discuss current minerals activities in the Sweet Grass Hills as shown in the errata entry for page 64, column 1, paragraphs 1 thru 8.

Santa Fe Pacific Mining, Inc.

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 Box 27019
 Albuquerque, New Mexico 87125
 505/881-3050

July 17, 1987

District Manager
 Bureau of Land Management
 Lewistown District Office
 Airport Road
 Lewistown, Montana 59457-1300

Dear Sir:

9 | Santa Fe Pacific Mining wishes to take this opportunity to comment on The Draft West HiLine RMP/EIS dated May 1987. Santa Fe Pacific Mining wishes to go on record in support of either alternatives A or B, particularly in the Sweet Grass Hills. We strongly oppose alternatives C and D because of the severe negative impacts which these alternatives will have on mineral development activities being conducted by our company and others in the Sweet Grass Hills. We believe the BLM has been deficient in its analysis of the hard mineral development potential in the Sweet Grass Hills. Santa Fe Pacific Mining also wishes to go on record in support of the BLM's proposal to revoke the Bureau of Reclamation withdrawal on the East Butte of the Sweet Grass Hills because of the significant positive impact for the minerals industry which revocation of this withdrawal would produce.

10 | Finally, Santa Fe Pacific Mining especially opposes the designation of an Area of Critical Environmental Concern (ACEC) on the East Butte of the Sweet Grass Hills because of the significant negative impact to mineral exploration and development plans which our company is currently pursuing. BLM admits in its Draft RMP/EIS that the Sweet Grass Hills is an area of historic and current mineral development and production activity. ACEC designation by the BLM in the San Juan Basin of New Mexico has proven to be an effective deterrent to responsible mineral development because of the attendant increased regulatory burdens which BLM has imposed upon the mineral development proponents within the ACEC's. In this regard, we are therefore mystified as to why BLM should cite mineral activity as a reason for ACEC designation.

Since 1984 Santa Fe Pacific Mining, Inc., in conjunction with Ernest K. Lehmann and Associates, has been conducting an extensive exploration program in the Sweet Grass Hills. The joint venture to which we belong controls approximately 3,600 acres of patented and unpatented mining claims plus numerous leases. Recent results have brought about more focused attention on the Tootsie Creek area in the East Butte where widespread ore

No. 9

Since the draft was published several mining companies have given BLM access to their geologic data. This has allowed a more detailed assessment of the hardrock mineral potential for the Sweet Grass Hills. For more information please refer to the errata entry for page 64, column 1, paragraphs 1 thru 8; and the responses to comments 7 and 8.

No. 10

The alternatives are not citing mineral activity as a reason for ACEC designation. BLM has removed the historical mining references on pages 4 and 62 of the draft. The reasons for designation are to: protect potential habitat for the endangered peregrine falcon reintroduction; protect areas of traditional importance to Native American tribes; and to protect seasonally important elk and deer habitat.

District Manager, BLM
 July 17, 1987
 Page -2-

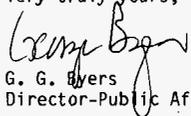
grade gold values have been found. Our current exploration program is geared toward initial reconnaissance drilling of seven holes in 1987 with a much more intensive effort proposed for 1988 should the 1987 drilling program show that ore grade mineralization is found at shallow depths. Based on results to date, we believe that there is an extremely favorable likelihood of finding mineable gold deposits in our area of interest.

The Draft RMP/EIS conclusion that valid existing mineral rights would be maintained within its proposed Sweet Grass Hills ACEC appears to be simply an attempt to muffle opposition to an ACEC designation. Despite the existence of valid existing rights, it has been the experience of Santa Fe Pacific Mining, Inc. that ACEC designation, or any other protective BLM management status, is always an effective deterrent to responsible mineral development, despite the presence of valid existing rights, because of BLM's imposition of onerous and unreasonable surface use and access restrictions. It has been our company's experience in both Arizona and New Mexico that it is at best futile and disappointing to rely on such "boilerplate" language regarding the recognition of valid existing rights such as ours.

Under Alternatives C and D BLM states that it "will consult with Native Americans on proposed developments in the Sweet Grass Hills." Shouldn't BLM also consult with the office of the State Geologist, local land owners, owners of mineral rights, and those persons such as Santa Fe Mining which are conducting mineral exploration in the area?

Thank you for this opportunity to comment on this important RMP/EIS.

Very truly yours,


 G. G. Myers
 Director-Public Affairs

cc: State Director, U. S. Bureau of Land Management, Montana
 Hon. Ron Marlenee, 409 Cannon House Office Bldg
 Washington, DC 20515

No. 11

The American Indian Religious Freedom Act (AIRFA) requires federal government agencies to consult with Native American groups on any proposed federal action that may impact their religious practices. The purpose of such consultation is to help BLM identify what, if any, impact a BLM action may have on Native American religious practices and what, if any, mitigating measures would be justified. Any discussion of proposed impacts and possible mitigation would of necessity, involve the proponents of such actions (mining claimants, mineral developers, operators, etc.). It would also have to involve other regulatory or concerned agencies (State Lands, State Historic Preservation Office, Montana Bureau of Mines etc.) as well as those persons or groups proposing the action or who may be directly affected by it.

ERNEST K. LEHMANN & ASSOCIATES OF MONTANA, INC.
GEOLOGISTS

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July 9, 1987

U.S. Bureau of Land Management
Lewistown District Office
Airport Road
Lewistown, Montana 59457

Attn: Mr. Wayne Zinne, District Manager

Re: West HiLine Resources
Management Plan Draft EIS

Dear Mr. Zinne:

We are in receipt of the draft Resources Management Plan Environmental Impact Statement for the West HiLine area of Montana. We hope to present oral comments at either the July 20th or July 21st public hearings, but in any case wish to submit the following written comments for the record.

As a major holder of mining claims and as a major holder of mineral leases in the Sweet Grass Hills area, we will confine our comments to that geographic area. We will also confine our comments on those factors of the proposed plan which are relevant to the "hard" mineral industry.

Our twenty-year-old firm is composed of professionals active in the minerals industry in the US and abroad, both as consultants and on its own account. Based on our experience, we believe that we bring special expertise and a breadth and depth of experience to bear on the issues that the plan implicitly raises.

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Summary:

12 In summary, we believe that in the Sweet Grass Hills the only viable alternative presented is Alternative "A", the no-action alternative. This is because (1) the planning process has been flawed, (2) the plan is based on inadequate data, and (3) the data presented do not substantiate the "preferred" alternative ("D").

Flaws in the Planning Process:

64 13 We are deeply concerned with the lack of notification to us of these proposed actions. We are the record claim owner of 25 mining claims at East Butte, 28 claims at Middle Butte, and 30 claims at West Butte. We have interests in approximately as many other claims. So far as we know, the record owners of these claims were not notified. In addition we are the record lessee of extensive privately and state-owned land in all three areas. We never received official notice from BLM of the proposed plan. We heard about the draft EIS only belatedly and then by word of mouth. We then had to initiate our own inquiry with BLM to obtain a copy of the draft.

14 We would also call attention to the recent U.S. Supreme Court decision on zoning. If the BLM chooses any alternative other than Alternative "A" (no action), such action will restrict the property rights of mineral owners and claimants and other landowners. It may therefore constitute a "taking" for which owners and/or their lessees may be entitled to just compensation.

No. 12

BLM has answered your specific questions in the following responses.

No. 13

Public participation is an integral part in the Bureau planning system. The BLM has attempted to involve interested parties throughout the planning process. BLM published Federal Register Notices and news releases and held meetings to encourage public participation. Table 5-1 of this document contains a detailed list of activities BLM undertook to ensure the broadest possible public participation.

No. 14

The criteria for evaluating mineral exploration or development proposals has been, and will remain, that of mitigating through the use of stipulations, activities that cause unnecessary and undue degradation. The 1872 Mining Law never authorized activities that cause unnecessary and undue degradation so the property rights of mineral owners/claimants will not be further restricted.

Under Alternative C, (which was not selected) the Sweet Grass Hills would be withdrawn from mineral entry. If validity exams were then conducted on preexisting claims they would constitute due process. A mining claimant has not established a property right if a validity exam reveals the claim is not supported by a mineral discovery under the mining law.

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The Background Materials Furnished are Inadequate:

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With respect to minerals in the Sweet Grass Hills, we believe the draft EIS is inadequate. We believe that the history of recent mineral-exploration activities, the area's potential for hosting economic mineral deposits, the economic potential of mineral development, and the geologic information presented are incomplete and partially incorrect.

Geologic Data

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The three main areas of the Sweet Grass Hills - East, Middle, and West Butte - as well as outliers such as Grassy Butte, are one of a number of alkaline and calc-alkaline volcanic centers of Tertiary age in north-central Montana, in the eastern Rockies, and in other areas in the stable interior of North America. Nearby examples in Montana include the Little Rockies, the Judiths, the Moccasins, the Bearpaws, and the Highwoods. Where these volcanic centers intrude the sedimentary rocks of the High Plains, they are complex emplacements of near-surface and extrusive volcanic rocks. The intrusion has domed up the surrounding sediments. The sediments typically range in age from Paleozoic to Tertiary. The core complexes consist of syenites, trachytes, latites, shonkonites, and related silica-deficient igneous rock suites. The intrusives may be altered, extensively brecciated, and locally mineralized. The intruded sediments include limestones, shales, and sandstones that are metamorphosed along the contacts with the igneous rocks.

One of the reasons for our choice in 1983 of the Sweet Grass Hills as an exploration site was that it was poorly mapped area. This fact and its regional similarities with important

No. 15

The geologic and economic information and mineral potential of the Sweet Grass Hills have been updated following the receipt of data from various mineral concerns since the draft RMP/EIS was published. For more information please refer to errata entries for page 64, column 1; paragraph 1 thru 8; page 65 column 1; and page 79, column 2.

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mineralized areas in Montana and elsewhere (as discussed below) led us to believe that the area holds significant promise of economically important mineral discoveries.

Mineral Potential:

Historically, mineral exploration in the Sweet Grass Hills from about the turn of the century onwards focused primarily on the occurrences of fluorspar as contact metamorphic deposits at East Butte, nonferrous metal deposits in igneous-sedimentary contact zones in the same area, placer gold occurrences at Middle Butte, and a small lead-silver occurrence on West Butte. The Draft EIS fails to mention the last two types of occurrences, even though active placer mining has been going on at Middle Butte for a number of years and patented mining claims exist on West Butte.

There is now active mineral exploration at East, Middle, and West Buttes, as well as at Grassy Butte. This is because the Sweet Grass Hills have strong similarities in rock type and style of mineralization to other important gold-producing and prospective gold-producing areas.

For example, there are strong geologic similarities and affinities of this area with the gold deposits mined by the Zortman-Landusky operations of Pegasus Gold Company, the largest gold producers in Montana, in the Little Rockies. The Sweet Grass Hills are also geologically similar to other major gold-producing areas in the world such as the famous Cripple Creek district of Colorado and the newly discovered deposits slated for development in New Guinea. The economic potential of the area is

No. 16

Please refer to response No. 15.

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not only for medium- to large-scale open-pit operations but also for higher grade underground deposits.

The geologic conclusion that there is potential for gold in commercial quantities in the Sweet Grass Hills is reinforced by the discovery of possibly ore-grade mineralization of unknown extent in drillholes at Grassy Butte and by anomalous concentrations of gold and related pathfinder elements in rocks and soils at East, West, and Middle Buttes.

The Economic Benefits of Mineral Exploration and Development:

The data presented are incomplete in that no presentation is made of the amount of exploration that has been done in the Sweet Grass Hills in recent years and the direct and indirect present and future economic benefits to the area from "hard" mineral exploration and development.

We estimate that since we began our own exploration program in the area in 1983, over \$500,000 has been spent by us and others on mineral exploration in the Sweet Grass Hills. This work has included geologic and geochemical mapping and sampling, geophysical, and topographical surveys and related work. Drilling has not yet been undertaken except at Grassy Butte. Extensive drilling will be required to test the identified and to-be-identified targets. A large part of the exploration expenditures remains in the local community in the form of payments to landowners for rentals and advance royalties and for the purchase of goods and services such as meals, lodging, road construction, labor, gasoline, repairs, etc. Before any discovery can be brought to the development stage, it is reasonable to estimate that an additional \$1 to \$5 million will be expended

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No. 17

Please refer to response No. 15.

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to explore and delineate a single orebody. In fact, the amount may be several times this, since the area holds potential for several orebodies. A large part of these expenditures will continue to be for local goods and services. These exploration expenditures alone will have a major positive impact on the region's communities such as Chester and Shelby.

If development of even a modest-size open-pit mine occurs, such an operation could be expected to employ directly 35 to 50 persons for periods of ten to twenty years as equipment operators, mechanics, technicians, and administrative staff. If labor is available in the area, most of these people will be hired locally. Such employment would result in a payroll in the range of \$800,000 to \$1.5 million annually in the area. A large open-pit operation or medium-size underground mine would employ comparably more people.

It is generally projected by economic planners that one direct job in the mineral industry produces about three to four indirect jobs in the local area. These indirect jobs provide the services required by the operation and its employees. Thus it is clear that if a viable mineral discovery is made in the Sweet Grass Hills, it will have a strong positive effect on the economies of the communities involved. It would diversify the employment base, decrease unemployment problems, and markedly increase the state and local tax base.

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The Data Presented by BLM Do Not Substantiate the Proposed
Preferred Alternative

18

For the reasons cited below, we believe that the choice of alternative "D" is not substantiated. Therefore, we believe that the only acceptable alternative proposed by the BLM is alternative "A", the "non-action" alternative. We believe that alternatives "C" and "D" propose unnecessary restrictions, impose unnecessary regulation and are not warranted.

Our reasons are as follows:

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- a. Environmental concerns regarding mineral projects must be addressed on a site-specific and project-specific basis.

Exploration is generally a broad-ranging activity that has little lasting or major environmental impact and should not be subject to regulation beyond those already imposed by the BLM and the State of Montana. The environmental impacts of mineral exploration are limited in time and extent. No area within the Sweet Grass Hills need be withheld from exploration since the activity is subject to adequate regulation by the BLM and the State of Montana to insure no lasting detrimental environmental effects.

Until there is a definitive proposal for a mineral development, it is impossible to judge the environmental impact which such a development will have. For example, the impact of a large open-pit operation is much different than that of a small one; the impact of an underground mine will be quite different than that of an open pit. Even a relatively large open-pit mine would probably occupy only a small area in comparison to the area under

No. 18

BLM has answered your specific questions in the following responses.

No. 19

We agree. The most meaningful analysis of project impacts and application of mitigative measures results from on-site inspections. However, resources that need protection from development can be identified prior to a development proposal. Mitigative measures would be applied when needed to prevent unnecessary and undue degradation of resources. For more information please refer to the Sweet Grass Hills Implementation section of Alternative D in Chapter 2 of this document.

20

consideration for restriction under Alternatives "C" and "D".
General restrictions cannot rationally be imposed in advance of the completion of the delineation of a mineral deposit and submission of a definitive development proposal; only then can environmental impacts be properly assessed.

b. The current regulatory process is adequate

In addition to the five-acre rule of the BLM regarding BLM surface, all physical exploration in Montana is currently subject to state permitting and bonding requirements. These state rules require reclamation whether the work occurs on private or public lands. To date, the state has adequately and fairly carried out its responsibilities.

Issues of air and water quality and many other environmental issues do not generally arise during exploration. The state's mine-permitting process for development, operation, and reclamation deals extensively with environmentally related issues such as air and water quality and biologic, cultural, and other resources. It does this on a site-specific and project-specific basis.

c. The proposed adoption of the raptor guidelines is unwarranted

21

As the report itself points out, there are no endangered raptor species in the Sweet Grass Hills area. Setting up buffer zones around possible future nesting sites is unwarranted and unnecessary because the BLM has not identified any funded program for the introduction of these species in the area.

No. 20

The Endangered Species Act of 1973, requires an assessment of all BLM projects, regardless of the presence or absence of threatened and endangered species. The Rocky Mountain Front Raptor Guidelines would be used to develop site specific mitigation for a specific project. The National Environmental Protection Act and the Endangered Species Act require BLM to assess an entire project (exploration, development, termination) before an action can be approved. The Peregrine Falcon Interagency Recovery Plan is mandated by the Endangered Species Act. BLM cannot act independent of it and BLM must consider the prospects for establishing threatened and endangered species in suitable or historic habitats.

No. 21

Peregrine falcons and bald eagles occur as migrants throughout the RMP area.

The management standards, and particularly the Raptor Guidelines in Appendix 2.2, will not be imposed until analysis reveals they are needed to prevent unnecessary and undue degradation of threatened and endangered and sensitive raptor resources.

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22

We further note that peregrine falcons are being successfully introduced into the middle of major metropolitan areas (e.g. on top of the Multifoods Tower in downtown Minneapolis), suggesting that no extensive buffers are needed to shield this species from human activities. Eagle nests have been noted close to many areas of intensive human usage, for example within 100 yards of the major highway entrance to the Cape Canaveral rocket launch area and in areas of diverse and intense human activity such as the St. Croix River valley of Minnesota and Wisconsin.

We conclude the effect of exploration on raptors can be expected to be nil and that the effect of mineral development on raptors can only be assessed on a site- and project-specific basis.

71

d. The imposition of additional rules cannot be justified on the basis of threatened or endangered species.

The report (p.50) admits that there are no plants in the Sweet Grass Hills that are on the threatened or endangered species list.

23

A close reading of page 51 of the draft indicates that, despite the introductory sentence to the discussion of endangered or threatened animal species, none of these exist in the Sweet Grass Hills per se.

If such species are identified during the mine-permitting process, the problems can be dealt with on a site-specific basis at that time.

No. 22

Some birds become conditioned to non-typical nesting sites such as the Multifoods Tower. This is an exception, not the rule. It is similar to introducing birds in the wild at "hacking sites." Hopefully, birds will return to these hack sites annually to establish new occupation areas in the wild.

No. 23

No plants listed as endangered or threatened under the Endangered Species Act are known to occur within the planning area. However, potential habitat exists for *Antennaria aromatica* and *Rorippa calycina* which are both potential candidates for listing as threatened or endangered species.

Potential habitat also exists for these Montana species of special concern: *Carex crawei*, *Carex sychnocephala*, *Hedysarum alpinum*, *Muhlenbergia andina*, *Plagiobothrys leptocladus*, *Psilicarphus brevissimus var. brevissimus*, *Ranunculus cardiophyllus* and *Triglochin concinnum var. debile*.

Please refer to response No. 21.

e. The imposition of additional regulation cannot be justified on the basis of cultural resources.

24 In three years of geologic mapping, our field personnel have not identified or noted a single archaeological site in the Sweet Grass Hills. The draft EIS fails to list any specific site in the Sweet Grass Hills in the discussion of significant cultural sites on page 56 of the draft.

The effect of mining on cultural resources can only be judged on a site-specific basis, as will be required under current state permitting procedures, at the time of application for a mining permit.

f. The effect of exploration on hunting and other recreational uses will be nil and cannot yet be judged for a mining operation.

25 Exploration should not have any significant or lasting effect on the elk or deer herds.

The effect of a mining operation will depend on size, location, and design and cannot be judged at this time.

No. 24

Overview information indicates some parts of the Sweet Grass Hills have high potential for significant cultural resources and several sites have been identified by BLM archaeologists. Project specific inventories have and will continue to be required for projects on public lands.

BLM is required to consider impacts to traditional Native American values from the actions it conducts or permits. The Sweet Grass Hills are known in historical and modern times to have been used by Native Americans pursuing traditional cultural activities.

No. 25

An environmental review is conducted when a Notice or Plan of Operation for mining or exploration is submitted. This review may identify the mitigation necessary to prevent unnecessary and undue degradation of resources. However, exploration disturbance (roads) and development activities can result in a direct loss of wildlife habitat and displaced wildlife. The degree of significance would depend on the magnitude of the operations.

ERNEST K. LEHMANN & ASSOCIATES OF MONTANA, INC.
GEOLOGISTS

- 26 | g. The effect of exploration on visual resources can only be determined on the basis of specific mine plans.

The area of the Sweet Grass Hills does not fall within the criteria for wilderness designation and has not been so designated.

Exploration will not cause any lasting degradation of visual resources.

Mining's visual effects can be partially mitigated by sensitive design, good siting, and good engineering. Proper reclamation will also mitigate effects. These will be considered in the state's permitting process.

- 27 | h. The imposition of the propose new rules will not eliminate conflicts with claimed rights of Native Americans.

Additional restrictions will not serve to extinguish the claims of Native Americans and therefore will not serve to facilitate exploration or mineral development or to prevent court action by Native Americans to assert their claimed rights.

Conclusion:

The Draft EIS is based on incomplete information as far as the geology and mineral potential of the Sweet Grass Hills are concerned. The Draft EIS does not adequately consider the possible economic benefits of mineral exploration and development.

No. 26

Mineral exploration and development would have an impact on visual resources in the Sweet Grass Hills. The cumulative impacts must be considered, if exploration indicates development is economically feasible. These impacts may be mitigated as each specific mine Plan is evaluated for its impact on the existing landscape. The impacts and reclamation needs would be considered during the BLM's review and the state's permitting process, regardless of the area's status for wilderness.

No. 27

While Area of Critical Environmental Concern designation would not eliminate conflicts between Native American religious rights and mining activity, it would allow BLM more time to attempt to resolve the conflicts before mineral development begins.

ERNEST K. LEHMANN & ASSOCIATES OF MONTANA, INC.
GEOLOGISTS

- 12

The environmental impacts of mineral exploration are temporary and minor.

The positive and negative environmental impacts of mineral development cannot be judged except on a site- and project-specific basis. With proper engineering, mineral development can be designed so as to mitigate unnecessary environmental degradation and at the same time insure that the benefits to the state and the community in terms of jobs, taxes and income will outweigh potential costs.

There are no endangered or threatened species in the area.

The imposition of the raptor guidelines is unwarranted based on the absence of nests in the area and on actual experience.

The impacts on recreational activities, especially hunting, are negligible during exploration and can only be evaluated on a site-specific basis for mining.

The conflicts over possible Native American rights would not be mitigated by the proposed choice of Alternative "D". The current state regulations and BLM regulations are adequate.

Therefore, Alternative "A", the "no-action" alternative should be adopted.

Very truly yours,


Ernest K. Lehmann, CPG
President

EKL/kjk

8706073
EE1001

Lloyd H. Oswood
Chester, Montana 59522

Wayne Zinne, District Manager
Lewistown District Airport Road
Lewistown, MT 59457

Re: West HiLine EIS

Dear Mr. Zinne:

I am a landowner in the Sweet Grass Hills of Montana. I oppose opening up the 520 acre tract to mining. I prefer Alternative C which I believe would best protect the resources and wildlife of the Sweet Grass Hills.

Sincerely,


Lloyd H. Oswood

Montana State Senate



SENATOR BOB WILLIAMS

SENATE DISTRICT 15

HOME ADDRESS:

BOX 338
HOBSON, MONTANA 59452
PHONE: (406) 423-5418

The Big Sky Country

COMMITTEES:
PUBLIC HEALTH WELFARE
& SAFETY
BUSINESS & INDUSTRY
HIGHWAYS & TRANSPORTATION

Hobson, Montana
August 4, 1987

Wayne Zinne, District Manager
Lewistown District of BLM
Airport Rd
Lewistown, Montana 59457

Dear Mr. Zinne;

I appreciate the efforts of the BLM in compiling the West Hilline Resource Management plan draft and bringing it to the general public. Due to a previous engagement I was not able to attend your Lewistown hearing but, my wife, Kati, attended.

After briefly reviewing your draft on the management proposal and discussing the proceedings of the meeting with Kati, I would think it prudent to lend my support to Alternative D with the alternatives suggested by Dick Knox and supported by the Missouri Breaks Multiple Use Assn. Many of these people have lived in the area all of their lives and have a vested interest in the preservation of the area.

The management proposal is for a ten year period. I understand that a staff person said that the fencing of areas to rehabilitate the water dependent habitat (riparian areas) would not be permanent--those two statements in the Missouri Breaks, to me, are contradictory. Without normal use, fenced riparian areas would cultivate weak specimens. The members of the Missouri Breaks Multiple Use Assn. are anxious to see these areas flourish and their practical judgment should be utilized.

Thank you for your consideration to the exceptions for Alternative D.

Sincerely,

Bob

Senator Bob Williams

BW/kw

No. 28

Riparian habitat management objectives include obtaining 90% stream-bank cover within 4-10 years after plans are implemented. Management practices may include but are not limited to riparian pastures, specific grazing methods or exclosures. All existing and future riparian exclosures would be maintained and monitored until data shows that the exclosures are no longer necessary.

A more comprehensive digest of this subject is presented in the Vegetation Management portion of Chapter 2 in this document.



Southern Rocky Mountain District
Exploration United States

P.O. Box 120
Casper, Wyoming 82602
Telephone 307/235-2511

August 10, 1987

Mr. Wayne Zinne
District Manager
Lewistown District Office
Bureau of Land Management
Airport Road
Lewistown, Montana 59457

Dear Sir:

Re: Comments on the Draft Resource Management Plan

29

There seem to be some discrepancies regarding stipulations. The BLM manages 626,098 surface acres and 1,329,014 subsurface acres. The tables in the mineral sections for the Environmental Consequences Chapter total over a million acres of stipulated land. The BLM has no legal authority to close private land to leasing which may be within the VMNWSR or WSA's. Additionally, standard and seasonal stipulations cannot be enforced on private surface with federal minerals.

30

Regarding the no lease decision for WSA's, it seems premature, prior to Congressional action, to withdraw lands from leasing. There is no evidence that leasing will degrade the wilderness characteristics, nor is there any benefit to the process by this withdrawal. The statement, "Appropriate protection can only be ensured by closing the lands to leasing," is unwarranted and should be amended.

31

A question arises on the Tables presenting "Constraints on Oil and Gas Exploration and Development". Do the Low Development potential acres make up for any difference in acreage figures?

32

In regard to the emphasis areas, the BLM has utilized overrestrictive measures including inflammatory wording to achieve a protection goal. It is not warranted to classify an area in ACEC and then provide a "buffer zone" around the ACEC. Will the next planning cycle provide a "buffer zone" around the "buffer zone"? The BLM has adequate statutory to protect and inventory threatened and endangered species as well as cultural and archaeological resources.

No. 29

The BLM manages 626,098 acres of surface estate and 1,328,014 of subsurface estate in the planning area. The figure 1,121,467 from Tables 4.1, 4.2, 4.3 and 4.4 of the draft is different from the total subsurface acreage because oil and gas ownership has not been retained on all of the subsurface mineral estate. Over half of these lands (58%) are leased under the standard terms and conditions attached to all leases.

No. 30

The BLM cannot issue leases, with or without stipulations, on federal mineral lands within the boundaries of the Upper Missouri National Wild and Scenic River or wilderness study areas. These lands are considered closed to oil and gas leasing as a result of legislation dealing with these respective land categories. The BLM is not proposing, nor does it have the authority to propose, the curtailment of private mineral development in the Upper Missouri National Wild and Scenic River or wilderness study areas. Please refer to the minerals portion of Management Common To All Alternatives discussion in Chapter 2 of this document.

The BLM does not have the legal authority to regulate how a surface owner manages his or her property. In all cases, the stipulations prescribed for federal mineral development in split estate situations apply only to the development of the federal minerals. These stipulations do not dictate surface management.

The mitigation measures present no restrictions on surface activities conducted for purposes other than those mineral development activities which are permitted, licensed, or otherwise approved by the Bureau of Land Management. One of the purposes of proposing such lease stipulations is to preserve the surface resources so that the surface owner can manage them as he or she chooses.

The BLM has a statutory responsibility under the National Environmental Policy Act, when considering issuing a mineral lease to assess the potential environmental impacts of the federal action. It also has the statutory authority under the Mineral Leasing Act, 1920, and the Federal Land Policy and Management Act, 1976, to take reasonable measures to avoid or minimize adverse environmental impacts that may result from federally authorized mineral leasing activities. This authority exists regardless of whether the surface is federally owned or not.

The Mineral Leasing Act, 1920, and the FLPMA, 1976, are not the only statutes that establish such authority. Other statutes that apply include the Clean Water Act, the Clean Air Act, the National Historic Preservation Act, the Endangered Species Act, 1973, the Federal Coal Leasing Amendments Act, 1976, and the Surface Mining Control and Reclamation Act, 1977. Please refer to the minerals portions of Chapter 2 for more information.

No. 31

There are only two categories of oil and gas development potential within the HiLine area "moderate" and "high". The tables in Chapter 4 of the draft have been revised and are shown in the appropriate errata locations in this document. The acreage does not equal the total subsurface acreage because oil and gas ownership has not always been retained.

Mr. Wayne Zinne
 August 10, 1987
 Page 2

33

Turning to the Appendices, there are no standard or seasonal stipulations outlined. It would be helpful to list the stipulations to be used.

The inflexibility of including specifics in the plan under Appendix 2.2, may cause problems in the future. The exact seed mix described under this Appendix could not possibly work for over half a million acres of BLM administered surface. Some flexibility must be incorporated or when variances do occur, a plan amendment will be necessary.

Thank you for the opportunity to comment on this plan and we hope you incorporate these suggestions.

Sincerely,



Bradley G. Penn
 Land/Environmental Coordinator

BGP/en

cc: M. M. Wade
 J. V. Polisini
 R. K. Bitter

78

No. 32

Management Zones ("Buffer Zones") around Areas of Critical Environmental Concern have been deleted from consideration in this RMP. However, the BLM is mandated to take reasonable measures to avoid or minimize adverse environmental impacts that may result from federally authorized mineral leasing activities. This authority exists regardless of whether the surface is federally owned or not. The Rocky Mountain Front Raptor Guidelines will be applied to federal mineral development in the raptor habitat areas, regardless of surface ownership (see Appendix 2.2).

No. 33

Some standard or seasonal stipulations were inadvertently left out of the draft document. Stipulations related to oil and gas activity have been revised and are now included in Appendix 2.2.

August 24, 1987
Whitlash, Montana

Wayne Zinne
District Manager
Lewistown District Office
Bureau of Land Management
Airport Road
Lewistown, Montana
59457

Dear Sir:

Please find in the following paragraphs comments on the RMP/EIS West Hilline Draft. I attended three of your public meetings, Great Falls, July 14, Shelby, July 15, and Chester, July 16. The following are comments on different subjects of the contents of the document pertaining to the Sweet Grass Hills where I own a ranch with my father.

As to the off road vehicle management in the Sweet Grass Hills, my choice of alternatives would be alternative C. Because of the problem of weed control on public and private adjoining land being spread by vehicles. The danger of fire to public and private adjoining land that can be caused by ORV's. Also the soil erosion caused by ORV that would be bad for the water shed importance of the public land and the whole Sweet Grass Hills.

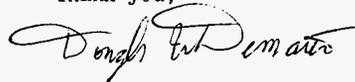
As to the Right A Way locations management of the Sweet Grass Hills. I would favor the alternative C which would exclude West and Middle Butte from ~~the~~ communication sites, as it would mean more roads which would mean more damage to water sheds, more weed control problems, and more fire hazards. Any road that has to be made is a permanent scar that the land will always have. As to the communication site on East Butte that is already there, I know from personal experience that it has to be controlled so as not to get any bigger in order for the adjoining private land to not suffer further damage on land, roads, etc.

As to the mineral exploration of the Sweet Grass Hills, from what I have seen in the last 40 years, is that 2 hours of cat tractor making roads can cause more permanent damage to the land by hurting water shed, cause weed problems to both public and private land, and all to often or usually for no real good. Mining can and has already destroyed a lot of historical beauty of the Sweet Grass Hills. Mining has a negative effect on water quality and quantity which is vital for the public and private land as well as for the people making a living on those lands. Mining on public land also pushes the wild life off public land and on to adjoining private land which puts a hardship on landowners by causing more damage to vegetation on private land. By wildlife being pushed off public land by mining the public has less chance to enjoy them. I know that the BLM has to manage the mining on public land inside the mining law of 1872, but I would like to see the BLM manage it and the surrounding federal subsurface minerals in the most careful and controlled way that they can. And withdrawal of most of the public land in Sweet Grass Hills from mineral exploration if they can.

As to the timber of the public land in the Sweet Grass Hills, it is of vital importance to both the public land and the adjoining private land as a water shed that supplies the creek and springs in the Hills. It should be managed as not to be commercialized as there isn't really that much timber there in any area on the Buttes.

As to the grazing on the public land in the Sweet Grass Hills, I know from being a third generation rancher adjoining the public land in East and Middle Buttes, that grazing on the BLM land is something that doesn't hurt the land over night permanetly, and that the BLM management of the grazing has plenty of time to stop any damage being done. I have seen very little if any damage to BLM grazing land over the years in the Sweet Grass Hills. The BLM land is usually the steep and highest land that is hard to get stock to graze anyway. I thank the BLM should manage the grazing as they have in the past as in alternative A.

Thank you,



Douglas W. Demarest
P.O. Box 7
Whitlash
Montana
59545
406-432-5185

8-25-87

Sirs,

I am strongly in favor of developing a trail head and trail system on BLM Land in the East Butte area of the Sweet Grass Hills.

There is a dearth of good hiking areas in the Havre Hi-Line area. East Butte would help to remedy this. BLM already has the Land so the trail head and trail is a very logical development.

Thank You

John Ellens
937 Second St.
Havre, Montana 59501

(Typed exactly as received for reproduction in the Final RMP/EIS)



United States Department of the Interior
 BUREAU OF RECLAMATION
 Missouri Basin Region
 P.O. Box 36900
 Billings, Montana 59107-6900

IN REPLY
 REFER TO: MB-152

AUG 26 1987

Memorandum

To: District Manager, Lewistown District Office, Bureau of Land Management,
 Lewistown, Montana

From: *AC/ING* Regional Environmental Affairs Officer, Billings, Montana

Subject: Review of Draft Resource Management Plan/Environmental Impact
 Statement for the West HiLine Planning Area of the Lewistown District,
 Montana (DES-87/16)

We have reviewed the subject document and offer the following comments:

1. Page 21 - The proposal to revoke the withdrawal on the remaining 529.67 acres of the Bureau of Reclamation riprap source is satisfactory, provided the 40 acres adjacent to the existing quarry remain in withdrawn status as is stated in Alternative A (No Action).
2. Page 29 - We would prefer that the proposal referenced in No. 1 (above) be elaborated more fully in Alternative D (Preferred) so as to eliminate any possible misunderstanding regarding your intent to permit the 40 adjacent acres to remain in withdrawn status.

Thank you for the opportunity to comment on this document. Should you have any questions about our comments, please contact Mike Erwin of my staff at (406) 657-6421.

AC/ING

Mike Erwin

cc: Commissioner, Attention: 150

No. 34

The BLM has reviewed the Bureau of Reclamation withdrawal on East Butte (569.67 acres), and is recommending that 40 acres of the withdrawal be retained. The remaining 529.67 acres would be returned to BLM administration and managed under Area of Critical Environmental Concern guidance.

Please refer to the Sweet Grass Hills Implementation portion of the Alternative D discussion in Chapter 2 of this document for further information.

Medicine River Canoe Club

Great Falls, Montana

August 24, 1987

Wayne Zinne, District Manager
Lewistown District, BLM
Airport Road
Lewistown, MT 59457

Dear Mr. Zinne,

SUBJECT: WEST HILINE RESOURCE MANAGEMENT PLAN

We wish to comment on your draft management plan and have deep felt concerns about some of the alternatives. We are commenting only on the areas that are of greatest concern to our organization, mainly those that will affect the Missouri River corridor.

LAND TENURE:

We are in favor of blocking up lands where it is advantageous to the recreationist or important in protecting the resource. We also believe that, even if isolated, riparian areas should be retained. (Alternative C or D)

OFF-ROAD VEHICLE MANAGEMENT:

We would definitely like to see significant restrictions on ORV use in important wildlife areas and along the river corridor; also on any riparian areas on tributaries within the management area. Not only are we concerned about the effects of erosion and the spread of noxious weeds but also the aesthetic degradation by noise pollution. The song of a meadow lark or the call of a wild goose drowned by the whine and roar of an ORV is an affront to the senses and indisputably intrudes upon the solitude sought by many river users.

UMNWSRM:

Visitor Services:

We favor Alternative D in regard to implementation of LAC and operation of visitor centers at Fort Benton and Judith Landing. On use of islands we can see the need for closure during the periods indicated to protect wildlife reproduction but they should be open to public use the rest of the year.

We urge you to adopt Alternative C in regard to interpretive activities. We are opposed to signs and displays along the river corridor. This, like ORV use, is an example of aesthetic degradation and is contrary to our concept of what the river corridor should be.

page 2

We suggest that a simplified and condensed version of the River History Digest be available to the public at no or minimal cost and that it concisely explain key geological and historical sites.

The current River History Digest is an excellent compilation and we commend its authors. We would like to see this work expanded, possibly to include more of the Canfield diary on Camp Cooke and similar inclusions. We would also like to see this work expanded to include some geological information. We think many river users are interested in this aspect of the river in addition to the fascinating historical comments.

Just as now, the information in the digest should continue to be keyed to river mile locations. This book could adequately inform people without need of landbased signs and displays. We are opposed to any use of such devices as, again, they only contribute to aesthetic degradation.

The digest should continue to be available on a loan basis but you might want to make it available for purchase. There are individuals who would be interested in owning this reference.

Facility Management:

As use of the corridor increases we can see the need for more undeveloped sites and possible upgrading to semi-developed sites. We are hesitant to endorse fully developed sites even in the recreational sections since they represent an intrusion of civilization that we feel is inconsistent with the character of the river that should be preserved. We endorse Alternative A.

Concession Management:

It is in this area that your proposals most disturb us. We are unalterably opposed to any major concessions in any area of the river corridor. The concept of marinas, RV parks and similar concessions is totally inconsistent with the concept of wild and scenic rivers. Even though these concessions would be restricted to the recreational areas, their presence in these areas would have an impact on adjoining areas and would certainly disrupt and devalue the total experience sought by many as they traverse the river corridor. We concur with Leroy Schelly's statement at the Great Falls hearing on July 14, 1987, "Floaters want to see the country like Lewis and Clark saw it."

It is inconceivable to us that this new frontier for development should even be considered. The thought of raping one of our few remaining natural sections of a major, nationally known river for the sake of a few bucks is appalling. We strongly support Alternative A.

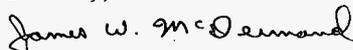
page 3

This river corridor is a magnificent heritage that should be preserved as nearly as possible in its natural state. It gives man an opportunity to step back in time, to reflect, to enjoy and to appreciate the moments of history described in the River History Digest. Recreational developments as proposed here would significantly alter the character of this river. If members of the recreating public wish a waterway with all the amenities of modern civilization let them chose one of the many already commercialized areas. Let us preserve what this fine stretch of Missouri River has to offer and determinedly resist the lure of commercial bucks.

We have enclosed an article from the current issue of Canoe magazine (Oct. 1987) in which some well-known artists express some of their feelings and reactions to this river. They reflect our emotions and attitudes quite well. We are hoping that this article will help you to realize that it is not just a handful of people in our organization alone that hold the attitude we have expressed.

All opinions expressed in this letter also apply to management of the Marias River.

Sincerely,



James W. McDermand, Spokesman
Medicine River Canoe Club
3805 4th Ave. South
Great Falls, MT 59405

8/26/87

Dear Mr Zinn,

On the reverse side is a letter I sent to the Lewistown office in early July. Your office sent me a copy of the West HiLine Draft.

35

While I agree that plan D seems the best the issue of cattle grazing in the waterway is not clarified. My cursory reading of the Draft indicates that riparian habitat will not be enhanced by any of the proposals. Of my objections listed on the reverse side, the presence of farms and cattle in the UMNWSR is objectionable to and contradictory of an aesthetic and natural experience.

My best to you on your management plans and enactment.

Sincerely,

Larry Gaffin

7/8/87

Dear Sir/ms.,

I was fortunate to be able to spend 4 days on a canoe outing from Loma Ferry to Judith Landing. I appreciate and applaud the work it took to establish this and the larger section of the Upper Missouri as a National Wild and Scenic River.

There are, However, several parts of my experience during this float on which I'd like to comment. I make these comments knowing a future plan for this river section is in the works, but I am not aware of its contents.

The waterway is a grand but very fragile facade. Hikes up several of the breaks revealed farms and farm activities at the very edge of the waterway, thus reducing the feeling and aesthetic of being in another place and time. However, that facade was at the point of dissolution because of the constant sound and presence of spray planes and cattle in the breaks and at the very water's edge. Not only does ranching encroach the integrity of the waterway but the quality of cottonwood groves is diminished because of grazing. The Hole-in-the-Wall campground was not something many floaters would want to use and the Slaughter River Campground was in ill-repair and completely overrun by cattle. The latrines were, however, fairly clean and functional at both sites.

The last thing that marred an otherwise positive and memorable experience was the constant presence and sound of military aircraft. The natural experience of being on the river was marred by this constant pollution of noise.

36

Again, I applaud the waterway, sympathize with your efforts to maintain it, and I would be willing to make specific comments for future use plans if you are receiving comments. Is an outline copy of the plan available?

Would you please send the extra copy of this letter to the appropriate Montana agency in charge of the Hole-in-the-Wall and Slaughter River Campgrounds. Thank you

Sincerely,

Larry Gaffin
331 Dillon
Mankato, Mn. 56001

(Typed exactly as received for reproduction in the Final RMP/EIS)

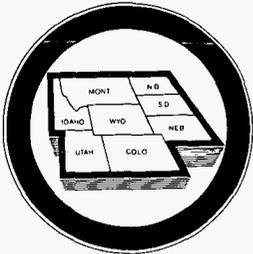
No. 35

Riparian habitat was not an issue analyzed in this planning effort. However, a Coordinated Activity Plan will be prepared for the Upper Missouri National Wild and Scenic River which will address riparian habitat. Riparian vegetation is also discussed in the Management Common to All Alternatives section of Chapter 2. Please refer to that discussion for additional detail and information.

No. 36

The current river plan is scheduled for revision beginning in 1988, with completion anticipated for late 1989, pending finances. The tentative schedule allows public review of the draft activity plan (river plan) early in 1989. Your name will be added to the mailing list.

Your comments have been provided to the Montana Department of Fish, Wildlife and Parks, the agency which administers these campgrounds.



1860 Lincoln Street, Suite 404 • Denver, Colorado 80295
303/860-0099

August 28, 1987

Mr. Wayne Zinne
District Manager
Bureau of Land Management
Airport Road
Lewistown, MT 59457-1300

Dear Mr. Zinne:

On behalf of the Rocky Mountain Oil and Gas Association (RMOGA), I appreciate the opportunity to provide you with our comments on the Draft Resource Management Plan and Draft Environmental Impact Statement for the West HiLine Resource Area in Montana. RMOGA is a trade association with hundreds of members who account for more than 90% of the oil and gas exploration, production and transportation activities in the Rocky Mountain West. Consequently, we have a vital interest in how the BLM plans to manage its lands in Montana. Our comments address several concerns we have regarding the proposed management of the Resource Area and the manner in which resource data is displayed.

We strongly disagree with the BLM's decision to withhold lands along the designated scenic and recreational segments of the Upper Missouri Wild and Scenic River from oil and gas leasing. The BLM refers in the planning document to a field solicitor's opinion in Appendix 2.1 as apparent justification for this decision. However, this opinion indicates that for nonwild segments of the river "Leasing under the mineral leasing laws can continue under the 1968 and 1976 Acts and can under such regulations as the Secretary of Interior may specify to effectuate the purposes of both Acts...It is noted that lands within wild segments will not be available for leasing." (emphasis added)

Upon reviewing the Wild and Scenic Rivers Act of 1968, it is obvious that Congress intended that oil and gas leasing be accommodated along nonwild segments of the river within the parameters established by the Secretaries of Interior or Agriculture. The Wild and Scenic Rivers Act of 1968, in Section 1280(a) states that "Federal lands which are part of the system and constitute the bed or bank or are situated within 1/4 mile of the bank of any river designated a wild river . . . are hereby withdrawn . . . from operation of the mineral leasing laws . . ." There is nothing in the law that states that the scenic and recreational segments of the designated river should not be leased with reasonable stipulations. This view is supported by the field solicitor's opinion which was quoted above.

No. 37

The BLM's interpretation of this quote from the Solicitor's Opinion (Appendix 2.1) is that new regulations which deal with the management priority given to recreation and preservation must be developed at the BLM Washington Office before leasing can continue in the scenic and recreational segments of the Upper Missouri National Wild and Scenic River. The closure will remain in effect until the Secretary of Interior directs BLM to take action on developing the needed regulations and lease terms that would lead to an active leasing program for non-wild segments.

The Mineral Resource Management portion of the Management Common to All Alternatives section in Chapter 2 has been revised to more clearly reflect the BLM's no-lease policy on the river corridor. Please refer to that section for additional discussion and information.

August 28, 1987

Mr. Wayne Zinne
District Manager
Bureau of Land Management

page 2

37
cont.

We have detected no adequate justification for the BLM's decision not to issue oil and gas leases within these segments of the river. Therefore, we are opposed to the no-lease decision, and recommend that the BLM reconsider its decision and issue leases along the scenic and recreational segments of the river with reasonable stipulations.

38

Another item of major concern is the Table on Page 9 where BLM indicates that 41,385 acres of wild and scenic river corridor would be managed under a no-lease policy. When the river acreage is added to the acreage provided for the wilderness study areas, a total of 66,885 acres is reached. Yet, on Table 4.4, Page 107, it is indicated that 120,113 acres are being managed for no-lease. This represents a difference of 53,228 acres. A difference of over 53 thousand acres is quite significant. What does this additional no-lease acreage represent and what is the justification for this no-lease decision?

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00

RMOGA is opposed to the designation as Areas of Critical Environmental Concer (ACECs) the Kevin Rim, Sweet Grass hills, and Cow Creek areas. As the planning document indicates, the entire planning area has moderate to high potential for oil and gas. In fact, the Kevin Rim area contains the oldest operating oil field in the State of Montana. We are concerned that such a designation would require more restrictive management in the future and that new production would be unduly restricted in an area which should be left open with a minimum of constraints.

The BLM has tried to justify these decisions by indicating that these areas require additional protection of threatened and endangered species, cultural resources, Native American religious sites, and designated National Historic Trails. However, there are numerous statutes which provide ample direction on how to mitigate adverse impacts to these resources as well as the authority to protect them. For example, the Endangered Species Act, the National Historic Preservation Act, the Antiquities Act, and the Archaeological Resources Protection Act, all provide comprehensive protection of the resources they address. In addition, the American Indian Religious Freedom Act mandates the same sort of protection for Indian religious sites. Consequently, we believe the BLM has at its disposal more than adequate authority to protect these values without adding the redundant layer of protection afforded by an ACEC designation.

39

On page 29 of the planning document, the BLM states it "would provide maximum protection of the significant and relevant resources in the Kevin Rim, Sweet Grass Hills, and Cow Creek areas . . . A management zone would be designated around the Kevin Rim and Sweet Grass Hills to ensure that development of federal minerals under private and state surface will be regulated, where authority exists, to follow the same guidelines on the ACEC".

No. 38

Please refer to response No. 32 for clarification.

No. 39

The text has been revised to clarify the application of stipulations to split estate. For more information please refer to the responses to comments 30 and 32.

August 28, 1987

Mr. Wayne Zinne
District Manager
Bureau of Land Management

page 3

39
cont.

We are gravely concerned that the BLM intends to establish buffer zones around the ACEC's and that it believes it has the authority to dictate special stipulations on split-estate lands. Buffer zones around ACEC's are totally unjustifiable and call into question the validity of the actual ACEC designation. With regard to split estate lands, while the BLM has the authority granted by nondiscretionary statutes to protect threatened and endangered species and cultural resources, it lacks any power to control privately-owned surface uses. The BLM's authority to affect National Environmental Policy Act (NEPA) mitigation extends only so far as it has legal control over the mitigation measures. According to Preservation Coalition v. Pierce, 667 F2d, 851 (9th Cir. 1985), a federal agency may assert control only as far as the law permits. The BLM is not able to dictate surface use to private owners nor to impose stipulations to protect privately owned surface.

68

This concept obviously represents federal zoning of private lands and should, therefore, be eliminated. We recommend that the BLM abandon the zoning concept and rely on the laws, regulations and guidelines which provide the BLM with direction on how to mitigate adverse impacts in statutorily protected areas. These tools should be utilized on a case-by-case, as-needed basis rather than on a zoning basis.

40

We are confused as to how much land in the planning area is public land. The BLM indicates that there are 626,098 acres of surface estate and 1,328,014 acres of subsurface mineral estate. We are further confused by Table 4.4 on Page 107 because it indicates that the BLM plans to apply stipulations to 1,121,467 acres of land. This total does not coincide with the figures for either surface or subsurface holdings. It is our understanding that the BLM has absolute authority only over public lands, where the surface and subsurface is federally administered together. In order to alleviate this confusion, we recommend that the BLM provide a specific discussion as to its intent in the form of a supplement to the subject plan and DEIS. It is important for the public to clearly understand exactly what type of management the BLM is proposing with regard to oil and gas activities and their relationship to the land ownership patterns within the West HiLine planning area.

41

We are also particularly concerned with the statement on Page 29 regarding the Kevin Rim area which states the BLM "would use the guidelines to develop stipulations for new development on existing oil and gas leases". The BLM does not have the authority to develop new stipulations for leases which have already been issued. The recently finalized Guidance for Resource Management Planning released by the BLM indicates that the BLM has absolutely no authority to require operators with previously valid existing rights to comply with new directives established in the new resource management plan. While the BLM may request operators to comply with new directives, it does not have the authority to require such changes after a lease has already been issued. Consequently,

No. 40

Table 4.4 has been revised. Of the 1,121,467 acres identified as moderate or high oil and gas development potential, 359,129 acres are constrained and 110,638 are closed to leasing.

No. 41

This language has been revised to read: BLM would work with operators to apply necessary guidelines to any new activity on existing leases which threaten nesting/rearing of state or federal sensitive raptors. These guidelines would be issued as special stipulations to all new oil/gas leases in the area. Please refer to the Kevin Rim and Sweet Grass Hills discussions in Chapter 2.

August 28, 1987

Mr. Wayne Zinne
District Manager
Bureau of Land Management

page 4

this provision in the West HiLine RMP is illegal, and we urge the BLM to remove this directive from the final RMP.

In conclusion, while we support the use of moderate and minor lease restrictions on areas available for lease, we cannot support the Preferred Alternative because it proposes to withhold lands from oil and gas leasing along the scenic and recreational segments of the Upper Missouri Wild and Scenic River. Furthermore, we do not support the buffer or management zone concept for either federal or private lands. The BLM has been granted the authority to protect certain resources by law; therefore, there is no need to set an unnecessary precedent by instituting management zones around the proposed ACEC's. This same argument applies to the BLM's proposed ACEC's. There is no need for an ACEC designation in areas which are statutorily protected by law. Such a designation could cause the BLM to preclude important oil and gas activities in the future, and especially given the fact that one of these areas is a known oil and gas producing area, we are opposed to any such prohibitions.

Thank you for your consideration of our comments. Should you wish to discuss any of them in further detail, please do not hesitate to contact me.

Sincerely,


Arice Frell Benitez
Public Lands Director

AFB:cw



United States Department of the Interior

NATIONAL PARK SERVICE
 ROCKY MOUNTAIN REGIONAL OFFICE
 12795 W. Alameda Parkway
 P.O. Box 25287
 Denver, Colorado 80225-0287



IN REPLY REFER TO:

L7619 (RMR-PP)

AUG 26 1987

Memorandum

To: Wayne Zinne, District Manager, Lewistown District Office,
 Bureau of Land Management, Lewistown, Montana

From: Associate Regional Director, Planning and Resource Preservation,
 Rocky Mountain Region

Subject: Comments on the draft Environmental Impact Statement/Resource
 Management Plan, West HiLine Planning Area (BLM) (DES 87/16)

The subject document presents a thorough analysis of the options available to Bureau of Land Management managers in the Lewistown, Montana, District/West HiLine Planning Area. The preferred alternative presents a balanced program of land disposal and exchange, recreational use, provision for preservation of key areas, and other appropriate resource management activities. Especially noteworthy are the well-thought-out plans for the Upper Missouri Wild and Scenic River.

It is not often that we have the opportunity to review, from any agency, such a well-written, concise environmental statement. It is further enhanced by the clean, uncluttered graphics and the outstanding line drawings.

We look forward to receipt of the final Environmental Impact Statement/Resource Management Plan for the West HiLine Planning Area.


 Richard A. Strait

Jeff Langen
601 North Third
Missoula, Mont 59802

August 27, 1987

Wayne Zinne
District Manager
Lewistown District, BLM
Airport Road
Lewistown, Mont. 59457

Dear Mr. Zinne:

The following are my comments on the draft West HiLine Resource Management Plan. I intend to confine my remarks to the Missouri River portion of the draft. Thank you for the opportunity to participate in this planning process.

I was born and raised in eastern Montana and I have floated the Missouri River regularly since I was seven. I've seen many changes on the river over the years and I have watched the BLM's management of the river with interest. I bring this perspective to your attention for two reasons; first, because I feel well qualified to comment on the plan because of this familiarity, and second, because I understand that while you exercise a great deal of managerial control over the Missouri, you and key members of your staff have yet to ever float the river.

With this in mind allow me to quickly summarize the several significant flaws I have identified in the draft R.M.P.

The single biggest issue facing Missouri River managers is the

propagation of Cottonwood trees. If you examine Cottonwood ecology you will find the U.S. WSR is facing the dramatic loss of these trees. Experts such as Dr. Mark Dehan, a botanist with the University of Montana have identified this issue in professional papers. Unfortunately, the closest your RMP comes to addressing this issue is to relegate the broader issue of riparian management to later, more obscure planning tools. I understand from friends in the BLM state office that the decision not to include this issue in the RMP was made by your Assistant District Manager. This is certainly indicative of the fundamental errors managers will make when they are unfamiliar with the resource they profess to manage.

While on the general topic of riparian management allow me to point out some of the problems with what the RMP does say concerning this topic. First, the issue is so fragmented that I had to read the document several times before finally piecing together some notion of how you plan to address riparian management. Second, if temporal exclosures of cattle are planned under all alternatives why is it treated as a benefit for just the preferred alternative (pg 105)? To me this kind of editorial bias is extremely unprofessional. Further, it is impossible to reach some understanding of your intentions when the RMP is so vague. Please clarify the following:

42 What are temporary exclosures (pg 111) and how will they affect the visitor experience, what are peak use periods (pg 105, 11), what is considered a high use site (pg 111), what do you mean by riparian areas may receive priority (pg. 11)? Please define what you plan to do and how. After all that is what the RMP process is for.

43

The BLM over the years has constantly shown a bias towards over developing recreation sites along the river. Unfortunately, the preferred alternative for the RMP perpetuates this poor planning. I read with shock the BLM's plans to upgrade undeveloped camping sites. This is grandiose and overdone. If you examine other wild

No. 42

Temporary livestock exclosures and selective grazing would be used within the Cow Creek Area of Critical Environmental Concern in Alternatives C and D. Exclosures would be constructed around high-use recreation sites within the Upper Missouri National Wild and Scenic River in Alternative D. These methods would be implemented in Cow Creek to allow riparian vegetation to reestablish and in the Upper Missouri National Wild and Scenic River to provide a more pleasant experience in highly used recreation sites along the river.

No. 43

The temporary exclosures referred to on page 111 of the draft would be a fence, either electric or jack-leg. Their intent would be to keep livestock out of portions of recreation sites. The peak (human) use periods refer to the primary recreation use season, which is from the weekend before Memorial Day through the weekend after Labor Day. The high-use sites are recreation sites identified as semi-developed in the draft document.

On page 11 the word "may" was changed to "will". These riparian areas will be prioritized in the revised river plan.

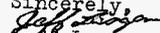
rivers you will find that this level of development is unheard of on rivers with use levels that far outstrip recreation use on the Missouri. Attempts to justify this over development with claims of sanitation problems have a hollow ring. The BLM's best public contact tool is the floaters guide and yet no where in the guide does the BLM outline proper sanitation and minimum impact camping techniques. Furthermore in my dozens of trips down the river the river rangers have yet to once approach me with such instructions.

44 Why the rush to develop sites without first attempting less drastic and cheaper alternatives? Incidentally, how does the BLM plan to pay for these developments when you are unable to even field an adequate river ranger staff? Please be specific.

94 45 On related recreation issues in the RMP: Referring to page 30, how does the BLM plan to differentiate between impacts caused by people and that of cows. Bare area is indicative of an over used site, but I suggest that most of that denuded area is caused by cattle use. Also could you please explain to me why management chooses 30% as an appropriate use level for outfitters? What exactly is the factual basis for this value?

With regard to cultural resource management, I believe it is a mistake to draw attention to cultural sites through the proposed interpretation and signing. This could only lead to increased vandalism and a reduction in the whole spirit of self discovery that is so important to the visitor experience on the Missouri. Leading people by the hand has no place on a wild river.

By way of closing, I would like to say that I feel the preferred alternative is fundamentally, and fatally flawed. The "C" alternative appears to best reflect the ecological and economic realities of the UMPWSR. I also think it was an unfortunate mistake to include planning for a national wild and scenic river in a resource area RMP. The appeal of the Missouri River portion of this draft will needlessly stall the entire RMP.

Sincerely,

 Jeff Langen

No. 44

The decisions in the RMP would be implemented in 10 to 15 years, depending on budget, staff, public demand for facilities, and necessary resource protection along the river.

Inadequate funding would affect time and implementation of the management actions and project proposals. Other options available for funding developments include public contributions, cooperative agreements with private organizations, private sector initiatives and volunteers.

No. 45

The intent of temporary exclosures around high use recreation sites on the Upper Missouri National Wild and Scenic River would be to provide a more pleasant recreational experience.

The proposed alternative has been revised and does not limit the capacity for outfitter operations on the Upper Missouri National Wild and Scenic River. Carrying capacity would be based on the limits of acceptable change. For more information, see the Alternative D discussion in Chapter 2 of this document.



GENERAL OFFICES: 40 EAST BROADWAY, BUTTE, MONTANA 59701 • TELEPHONE (406) 733-5421

August 28, 1987

Mr. Wayne Zinne
District Manager
Bureau of Land Management
Lewistown District
Airport Road
Lewistown, MT 59457

Dear Mr. Zinne:

Thank you for the opportunity to comment on the Draft West HiLine Resource Management Plan, Environmental Impact Statement (EIS).

The Montana Power Company (MPC) currently provides electrical and gas service to customers within the West HiLine Resource Management area via an extensive network of transmission and distribution lines. MPC must be assured access to all MPC-owned facilities for repair and/or service. Thus, upon reviewing the EIS, we would like to make the following comments.

We commend the Bureau of Land Management (BLM) for recognizing the need for future utility corridors in the EIS. We do, however, recommend the EIS be revised to better reflect the Montana Department of Natural Resources and Conservation's major facility siting rules as posted in the Montana Major Facility Siting Act (MMFSA). For instance, clearly defined correlations between BLM's terminology, i.e., avoidance area, area of critical environmental concern, etc., and that of the MMFSA, i.e., exclusion area, sensitive area, etc., would help expedite future linear facility applications that may be required when the area's natural resources become more actively sought after.

The EIS does not differentiate between the effects of small transmission lines, such as 50 kV and large transmission lines like 500 kVs. The impacts that these lines have on the environment are extremely different and should be so noted in the final EIS.

No. 46

The administrative language for the Montana Major Facility Siting Act (MMFSA) has the following correlation with BLM's terminology:

BLM	MMFSA
Exclusion Areas	Exclusion Area Avoidance Areas Sensitive Area
Windows	No apparent corresponding definition.

For definitions, please refer to the glossary portion of this document.

No. 47

The draft RMP did not differentiate between small and large electrical transmission lines. The term transmission line in the RMP refers to all types of transmission facilities.

The reason for the lack of a definition is because a 69 KV line or an 8 inch pipeline can have the same surface or visual impacts as a 230 KV line or 16-inch pipeline. Site specific impacts would be considered when BLM reviews right-of-way grant requests.



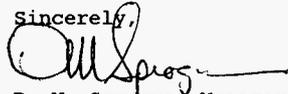
Mr. Wayne Zinne
August 28, 1987
Page 2

48 Map 4, which depicts off-road vehicle use and right-of-ways within the resource management area, incorrectly portrays MPC's transmission lines. Additionally, both transmission lines and highways are depicted by red lines on the map. This could be confusing to those unfamiliar with either, and could be easily solved by making a better distinction between the two with slashes, dashes, etc. We have provided two current MPC System Maps, i.e., one for electrical transmission and one for electrical transmission and gas lines for your reference.

49 We assume that the Department of National Resources and Conservation should read Department of Natural Resources and Conservation under Issue No. 3: Right-of-way Location on page 6 of the EIS.

We appreciate this opportunity to comment. Please send any subsequent information to Elvin Fitzhugh.

Sincerely,



D. M. Sprague, Manager
Environmental Department

DMS/EF/lh

Enclosures

No. 48

The intent of Map 4 is to show the occupied corridors as shown in the Western Regional Corridors Study, 1986. The intent was not to show individual systems. Therefore, not all of Montana Power Company's system is shown. Information received during the public comment period resulted in BLM adding the Western Area Power Administration transmission line from Conrad to Shelby to Map 4 of the final West HiLine RMP and to our copy of the Western Regional Corridor Study.

Corridors have been portrayed so the differentiation between highways and corridors will be more easily made.

No. 49

The text has been revised.

Medicine River Canoe Club
Great Falls, Montana

August 30, 1987

Wayne Zinne, District Manager
Lewistown District, BLM
Airport Road
Lewistown, MT 59457

Dear Mr. Zinne,

RE: WEST HILINE RESOURCE MANAGEMENT PLAN

The BLM "90 day" comment period on this plan has ended. This time frame apparently began when the plan was published in May. However, a large percentage of interested people did not become aware of the plan until the public meetings were held in late July. In effect, this gave them only five or six weeks to comment.

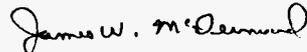
The time allotted, mostly encompassing the month of August, is a prime vacation time for many which makes it difficult to inform interested people and give them time to respond.

We respectfully ask that you grant an extension to your comment deadline. We suggest October 15th as a reasonable and adequate date. From what we understand, public comment is and should be a major factor in your agency's decisions.

We are aware of several groups who are sincerely interested in the plan and are working on comments at this time. Their interests surely must be considered. An official extension of the comment period is certainly in the public's interest.

Thank you for your consideration.

Sincerely yours,



James W. McDermand, Spokesman
Medicine River Canoe Club
3805 4th Ave. South
Great Falls, MT 59405

No. 50

We appreciate your interest in the West HiLine RMP and agree that public comments are major factors in the BLM's decision making process. However, in order for BLM to adhere to its planning schedule and remain fair to the groups and individuals who have already submitted comments, we could not formally extend the comment period beyond September 3rd.

Nevertheless, we did accept comments for as long as possible after the September 3rd closing and made every effort to consider them while revising the document.

Hill Rte.
Chester, Mt. 59522
September 2, 1987

Wayne Zimne, District Manager
Lewistown District Office
Bureau of Land Management
Airport Road
Lewistown, Mt. 59457

Dear Mr. Zimne:

This letter is sent with our comments regarding the exploration being done in the Sweet Grass Hills. We request that these comments be placed in the record.

51 || We are disturbed and opposed about the exploration and proposed mining. We are concerned about the affect it will have on the quality of the water and its effect on the hills, domestic animals as well as the wild life.

We are ranchers in the Sweet Grass Hills and are very concerned as our ranch is adjacent to the area and we are also on the Tootsie Creek drainage.

We believe that the BLM doesn't have the resources, interest or desire to properly protect this valuable natural area. We urgently request that Alternative C be approved. We also request that the additional 520 acres of Bureau of Reclamation lands NOT be opened to mining.

52 || We would like any and all archeological studies done in the area of the Sweet Grass Hills prior to the road construction and drilling exploration done.

Sincerely
Janine L. Wolery
Daniel Wolery

(Typed exactly as received for reproduction in the Final RMP/EIS)

No. 51

Currently, there are no mine development proposals for the Sweet Grass Hills on BLM-managed surface, nor are there any permits pending authorization. There is an exploration plan that was approved in 1986, and is still active. Mitigation to prevent unnecessary and undue degradation to resources would be developed at the time BLM receives a Plan of Operation.

No. 52

Where necessary, the BLM has performed archaeological studies in the Sweet Grass Hills and has complied with the provisions of the National Historic Preservation Act (as in 36 CFR 800).

Information on the archaeological studies completed in the Sweet Grass Hills was provided by letter on September 14, 1987.

Chester, Mt. 59522
Sept. 2, 1987

Dist. Mgr. Wayne Zinne
Bureau of Land Management
Airport Road
Lewistown, Mt 59457

Re: EIS plan-West HiLine

Dear Mr. Zinne,

Many of us here on the hi-line are concerned about the devastation going on in the Sweet-Grass Hills. There seems to be no concern for Indian relics and remnants of culture nor to the preservation of the beauty of the hills.

53 | I would like to be reassured that the laws protecting such areas are being observed and that we can expect to honor the past as well as the future.

Sincerely,
Mrs Helen Kuhry
Box 555
Chester, Mt 59522

No. 53

Please refer to response No. 52.

(Typed exactly as received for reproduction in the Final RMP/EIS)

Box 361
 Chester, Montana 59522
 September 1, 1987

Wayne Zinne, District Manager
 Lewistown District Office
 Bureau of Land Management
 Airport Road
 Lewistown, Montana 59457

Dear Mr. Zinne:

This letter is sent with our comments on the West
 Hi-Line Resource Management Plan EIS. We request that these
 comments be inserted in the record.

We are opposed to mining in the Sweetgrass Hills, at
 least the way it is now being done. We have concluded
 that the BLM has neither the resources, interest or desire
 to properly protect this valuable natural area..perhaps
 it is a combination of the three. We urgently request
 that Alternative C be approved. Also we submit that the
 additional 520 acres of Bureau of Reclamation lands NOT
 be opened to mining.

We would like to receive information about the
 archeological studies that were conducted prior to all of
 the road construction and core drilling that has taken
 place. Doesn't the law require such studies before the
 disturbances take place? We are certain that it does.

Sincerely yours,

Marvin E. Krook
 Marvin E. Krook

Carole E. Krook
 Carole E. Krook

No. 54

Please refer to response No. 52.

100

54

MONTANA ASSOCIATION OF STATE GRAZING DISTRICTS

420 North California St.

Helena, Montana 59601

(406) 442-3420

John Pjaff, President Miles City
 Steve Enkerud, Vice President Glasgow
 Stuart Daggett, Executive Secretary Helena

DIRECTORS
 Bill Atmy Lemay
 Lynn Cornwell Glasgow
 Mark Davies Chinook
 Joe Etchart Glasgow
 Jack Hughes Grassrange

September 1, 1987

Mr. Wayne Zinne
 District Manager, BLM
 Airport Road
 Lewistown, MT 59457

Dear Mr. Zinne:

The Montana Association of State Grazing Districts, the Montana Public Lands Council, and the Montana Stockgrowers would like to comment on the draft Resource Management Plan/Environmental Impact Statement for the West HiLine planning area of the Lewistown District.

We realize the public lands are under scrutiny not only from outside interests here in Montana, but across the United States and from Congress as well. We do not envy your position in having to please all these interests as well as livestock permittees.

However, it seems the livestock industry usually ends up giving something up when management is re-evaluated. On page 10, it is stated that the Bureau of Land Management and the Montana Fish, Wildlife, and Parks will cooperate when determining habitat and population size of wildlife. Landowners should also be consulted, we feel, as their private lands are where most wildlife are found.

In regard to riparian management, livestock can be used as a management tool to improve riparian areas. We encourage the use of riparian pastures as is stated on page 11. We also feel the permittee and the BLM should work together in regard to these management objectives. The improvement which will occur will benefit not only the permittee, but other multiple users as well.

Since the public lands are under multiple use objectives, not only will livestock have to get along with the other uses, but the other uses will need to cooperate with livestock.

We thank you for this opportunity to comment on this plan.

Sincerely yours,



Kim Enkerud

No. 55

The BLM has and will continue to cooperate with the Montana Department of Fish, Wildlife and Parks and landowners to determine wildlife habitat and population size.

The text has been revised to include landowners.

DONALD R. MARBLE

Attorney at Law

September 2, 1987

MARBLE LAW OFFICE
 WESTLAND BUILDING
 P.O. BOX 649
 CHESTER, MONTANA 59522
 (406) 759-5104
 1-800-237-4891

Wayne Zinne, District Manager
 Lewistown District Office
 Bureau of Land Management
 Airport Road
 Lewistown, Montana 59457

Re: West HiLine Resource Management Plan EIS

Dear Mr. Zinne:

This letter comprises my comments on the above described EIS and I request that the comments be inserted in the record.

I am opposed to mining in the Sweetgrass Hills, at least in the manner in which it is now being conducted. I concluded that the BLM has neither the interest, resources, or desire to properly protect this valuable natural area. Perhaps it is a combination of all three. Therefore, I request that Alternative C be approved. Also, I submit that the additional 520 acres of Bureau of Reclamation lands not be opened to mining.

56

Please advise me of the nature of archeological studies that were conducted prior to all of the road construction and coredrilling that has taken place. I know that the law requires such studies before the disturbances take place.

As regards the federal lands on the Marias River, there are a great many valuable archeological resources there that need immediate protection. ORTV should be strictly limited there as they cause great damage.

Sincerely yours,



Donald R. Marble

DM/ps

No. 56

Please refer to response No. 52.

Chester, Montana
September 2, 1987

District Manager
BLM
Airport Road
Lewistown, Montana 59457

To whom it may concern,

I am opposed to any type of mining in the Sweetgrass Hills. The return that the Town of Chester and Liberty county would receive compared to the destruction of an area that many generations of the past and future have enjoyed or will enjoy isn't worth it. I will never understand industry and government's total disregard for the people of an area when they feel that there is some possibility of gain from the destruction of something as beautiful as these isolated mountain ranges that we have in Montana. Just take a look at Zortman what it is now and what it was.

I would like to go on record as favoring Alternative C.

Cordially,

Wayne L. Wardell

Wayne L. Wardell

Mayor of the Town of Chester



United States Department of the Interior

NATIONAL PARK SERVICE

MIDWEST REGION

1709 JACKSON STREET

OMAHA, NEBRASKA 68102-2571



IN REPLY REFER TO:

L6017 LCT-MT(MWR-RE)

SEP 01 1987

Memorandum

To: District Manager, Lewistown District Office, Bureau of Land Management

From: Associate Regional Director, Cooperative Activities, Midwest Region

Subject: Draft Resource Management Plan/Environmental Impact Statement for the West HiLine Planning Area

We have reviewed the subject document from our perspective as the Office responsible for administering the Lewis and Clark National Historic Trail.

We noted the commitment on page 14 that you will manage the segment of the trail within the planning area in a manner consistent with the purposes and provisions of the National Trails System Act. You have already taken a number of actions to manage the trail in accordance with our January 1982 Comprehensive Plan for Management and Use of the trail. Among these are the marking of public access sites with the official trail marker, the publication of an information booklet in 1984 which highlights the trail as well as the wild and scenic river, and development of new exhibits and interpretive materials about Lewis and Clark at the Fort Benton visitor contact station. We appreciate your initiative in these endeavors. We especially appreciate the manner in which your river manager, Mr. Chan Biggs, has coordinated his activities with our trail coordinator in this Office.

We hope to complete a slide/tape program about the Lewis and Clark National Historic Trail later this fall or early next year. We will provide you with a copy for the Fort Benton visitor contact station.

David W. Shank

MIKES IGA
Michael and Margaret Novak
Drawer H
U.S. Highway 2 East Chester, Mt. 59522
406-759-5538

9-2-87

BLM, District Manager
Airport Road
Lewistown, Mt. 59457

Sirs:

I am opposed to any strip mining or major road
construction in the Sweetgrass Hills.

I favor alternative C of the West HiLine
Resource Management Plan.

Thank you

Margaret M. Novak

No. 57

Please refer to response No. 51.

(Typed exactly as received for reproduction in the Final RMP/EIS)

57

105

September 2, 87

Wayne Zinne , District Manager
Lewisrown District Office
Bureau of Land Management
Airport Road
Lewistown, Montana 59457

Re: West Hi Line resource Management Plan EIS

Dear Mr. Zinne,

58 In regard to the planned stripmining of the Sweet Grass Hills, I am concerned about the effect of the mining will have on the water resources of this area. I am thereby opposed to the project in the manner it is being conducted. This Land is a valuable Natural Resource, and should be properly protected. I request that the option alternative C be approved, and that the additional 520 acres not be open to mining. Please include my comments in the record. Thank you for your consideration.

No. 58

Please refer to response No. 51.

Sincerely Yours,


Trudy Laas Skari
Farmer in Liberty County

Box 514
 Chester, Mt. 59522
 September 2, 1987

Wayne Zinne, District Manager
 Lewistown District Office
 Bureau of Land Management
 Airport Road
 Lewistown, Montana 59457

Dear Mr. Zinne:

59 | This letter is written in regard to the West HiLine Resource Management Plan EIS. We are opposed to the mining that is planned for the Sweetgrass Hills and the manner in which the exploration has been done in 1986 and 1987. It appears that the BLM has neither the interest nor the resources to protect this area which has untold numbers of wild life and birds plus plants that are found in Glacier Park and the Bear Paw Mountains. This is a pristine area and a source of recreation for Liberty County and surrounding counties.

The Sweetgrass Hills is an unusual formation and contains many minerals other than gold. Seems they will be leveled just because of a large mining company wanting the gold.

We urgently request that Alternative C be approved. Also request that the additional 520 acres of Bureau of Reclamation lands not be opened to mining.

107 60 | We would like any and all information on the Archeological studies done in the area of the Sweetgrass Hills prior to the road construction and core drilling.

Sincerely,
 Janell & Wardell
 &
 M. Sterling Wardell

(Typed exactly as received for reproduction in the Final RMP/EIS)

No. 59

The exploration work completed has adhered to the protective stipulations in the approved exploration plan. For more information please refer to response No. 51.

No. 60

Please refer to response No. 52.

September 2, 1987

Wayne Zinne, District Manager
Lewistown District, BLM
Airport Road
Lewistown, MT 59457

Dear Mr. Zinne:

I am a retired college professor. During the years of my tenure I was much involved with both the History and ecology of the Missouri River. I worked closely with Mr. Don Dentigney, the original river rat, was active in seeking, with others, the wild and scenic river designation for the river and for many years participated in a regular scheduled float trip made up of students from Northern Montana College. I am also featured in B. Gildent's book on the Missouri River. For many years the so called "Floating Classroom" has been and continues as a regular feature of the MNC summer program. There is much more but I do not want to write an autobiography but to suggest I have had a great deal of experience with the Missouri River of the breaks and white cliffs.

SUBJECT: WEST HILINE RESOURCE MANAGEMENT PLAN

First let me compliment you and those who put together the PLAN. It is most extensive and informative.

My broad philosophy about the river centers on the perpetuation and maintenance of the river as it was in the earliest of historical time. This would be the Lewis and Clark period. This may seem somewhat out of touch with our time; but I hold with it as an ideal. To me solitude, a sense of past times, an unspoiled habitat and a kind of magic that makes up the river are the things that need care - sorge - a deep loving care.

I would be cautious about ORV, pickups and RVs do not mix with the river.

Signs along the river are not needed. Hand outs or modestly printed maps such as you now have are excellent. Reading as you canoe produces involvement The process of identification that you with reading and examining maps is a good one

Current Ranger activity at Coal Banks and the Judith Landing are sufficient.

I do not know about current campground usage. At peak periods there may be crowding. I have not seen it. Camps at Hole in The Wall and Slaughter River could be expanded. That is a Fish Game and Parks (Montana) problem unless things have change. Additional sanitation facilities could be added at Eagle Creek. Some type of modestly improved campground is needed midway between Judith Landing and Cow Island. A water source would be helpful.

During breeding periods people should be kept off the islands. Oddly I do not recall seeing any island usage except of lunch stops.

61 I have a great deal of difficulty with concessions at Coal Banks or Judith Landing. I disapprove of the idea. I also think the idea is economically risky. How could anyone make money? The outfitters who operate out of Fort Benton - Bill Singer - do well and I'm sure would find moving a tricky business.

This represents my thinking on the subject.

Thank you for keeping me informed.

Sincerely,
Harrison Lane PhD

I do not type and apologize for my scrawl.

Phone: 265-7653 HAVRE MT - area code 406
Address: 133 8th St
Havre MT 59501

PS On the river as magic see "The White Cliff, A Place of Magic" slides by Don and Richard Dintiegy Narration by Wm Lisinby Text by Harrison Lane PhD

Call or write
Elinore Clark
Clark Museum
Havre, MT 59501

(Typed exactly as received for reproduction in the Final RMP/EIS)

No. 61

BLM's proposed alternative would encourage private sector initiatives in developing river management opportunities. If there is a need established for some type of facility, whether it be BLM or private sector initiative, the merits and economic feasibility would be assessed under the guidance in the Wild and Scenic Rivers Act, as amended, this RMP, and the Upper Missouri Coordinated Activity Plan.

For additional information please refer to the Upper Missouri National Wild and Scenic River Management section of the Proposed Alternative description in Chapter 2 of this document.

Box 296
 Chester, MT 59522
 September 2, 1987

Wayne Zinne, District Manager
 Lewistown District Office
 Bureau of Land Management
 Airport Road
 Lewistown, MT 59457

Dear Mr. Zinne:

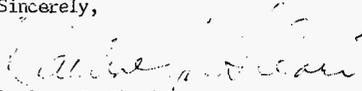
I am writing concerning the West HiLine Resource Management Plan EIS. I request that my statement be inserted in the record.

As part of a family that farms just south of the Sweetgrass Hills, I am very disturbed with the manner in which mining is being undertaken in the hills. There appears to be no regard for careful building of roads, or any attempt to take care of the fragile environment. Of great concern to us is the potential for disruption of the water table with strip-mining. We, and many of our neighbors, depend on wells that are more than local in nature.

The unspoiled natural beauty of the Sweetgrass Hills means a lot to the residents of this area. To destroy that for a temporary profit for a few out of area residents seems to be very shortsighted.

Therefore, I request that the additional BLM Lands in the hills not be opened for mining, and that Alternative C be approved.

Sincerely,


 Darlene J. Skari

No. 62

Please refer to response No. 51.

110

62

Chester, Mt 59522.
Sept. 2, 1987

Dist. Manager
Bureau of Land Management
Lewistown, Mt 59457

Re: West HiLine Management Plan EIS

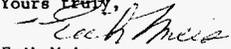
Dear Sir:

63

I want to go on record as opposing the above EIS . I am definitely against the manner in which the mining is taking place in the Sweetgrass Hills. It seems that Federal laws requiring archeological studies are not observed by federal agencies. Perhaps this should be investigated by our congressman.

Please be assured of my continued interest in this sacrifice of natural beauty and resources. I request that Alternative C be approved if this is to continue.

Yours truly,



Erik Meis
Box 52
Chester, Mt 59522

No. 63

Please refer to responses No. 51 and 52.

111

Sept 3

Dear Sirs

I am opposed to what you are doing in the Sweetgrass Hills. I prefer Alternative C to stop the mining and to not open the 529 acres.

The Hills are the only beauty we have here in Northern Montana and I want to see them left as they are as they are nature made. So please stop the mining in the Sweetgrass Hills. I can look out everyday and see these hills from my house and they are beautiful as they are.

Thanks,
Norma Layton
Box 224
Chester, Mt 59522

(Typed exactly as received for reproduction in the Final RMP/EIS)

9/3/87

District Manager BLM

Dear Sir:-

If anyone must go digging around and then deserting that area in the Sweet Grass Hills I would rather they used Alternative plan C. I believe any plan is just a lost investment.

Your
Almira Brevick
Box 73
Chester MT 59522

(Typed exactly as received for reproduction in the Final RMP/EIS)

BLM

My husband & I prefer Alternate C
& stop mining & not open the 529
acres of the Sweet Grass Hills.

Thank you
Gary & Joanna Standiford
(Chester Mt.)

(Typed exactly as received for reproduction in the Final RMP/EIS)

Due to the Deadline we are
unable to write a formal letter.
We are in favor of
Alternative C
Dan & Cindy Crismore
Travis & Trent Crismore

(Typed exactly as received for reproduction in the Final RMP/EIS)

Wayne Zinne
 District Manager
 BLM Office
 Airport Road
 Lewistown, MT. 59457

Dear Wayne Zinne,

This letter is in response to the West Hilline Resource Management plan. I work for Liberty County as Weed Supervisor. On a persons! bases I think the mining operation is a great mistake. I have recently been in the area that the mining is proposed and the Santa Fe company has infact already disturbed a great deal of land. They will have a very hard time reclaiming this land, and if they have filed a reclamation plan it has never passed through my office. Another reason that I think the mining should be limited is that I have seen just how destructive most operation of this nature can be. Now as far as the weed problem is concerned I would hate to see this area become infested with weeds. A perfect example is the Rock Quarry on East Butte, the Quarry was originally granted as a riprap source for reclamation projects. This area is now heavily infested with Spotted Knapweed and Leafy Spurge, and is costing the landowner and the Bureau of Reclamation a great deal of money, and it's going to take many, many years clean it up.

I would like to see mining in this area limited, the Hills are the only place where a person can go and enjoy the beauty that can only be found in a moutainess area without traveling a couple of hundred miles. I am from the western part of the state originally and I think the Sweet Grass Hills compare very well with the western moutains except their not covered with Knapweed, Logging Roads and Mining camps, and I hope the never do. There just is not enough of the Sweet Grass Hills to go around so please keep the mining to a minimum.



David Burch
 Box 501
 Chester, MT. 59522

No. 64

Disturbances greater than 5 acres require an approved Plan of Operations, which includes a reclamation plan. The reclamation plan would analyze impacts, and provides the opportunity for public participation when the identified impacts are significant or the level of controversy is high. However, these plans are not submitted for formal approval at local government levels.

For additional information please refer to the Mineral Resource Management section of the Management Common to All Alternatives description in Chapter 2 of this document.

United States
Environmental Protection
Agency

Region 8, Montana Office
Federal Building
301 S. Park, Drawer 10046
Helena, Montana 59626-0046



REF: BMO

SEP 02 1987

Wayne Zinne
District Manager
Lewistown District Office
Bureau of Land Management
Airport Road
Lewistown, Montana 59457

Re: West Hiline Resource Management
Plan/Draft Environmental Impact
Statement

Dear Mr. Zinne:

In accordance with our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act, the Region VIII Montana Office of the Environmental Protection Agency has reviewed the referenced draft environmental impact statement (EIS).

Specific comments are attached. The following is a summary of our review:

Based on the information provided in this Draft EIS, Alternative C has the least amount of acreage subject to the negative impacts addressed in this EIS, therefore, it appears to provide the greatest degree of protection to natural resources.

The management policies outlined in Chapter 2 could reduce the negative impacts under all alternatives. However, a more detailed description of these management techniques, a description of the criteria which govern their application, and an assessment of their potential to reduce specific negative impacts under each alternative is needed. This information could significantly influence the comparison of impacts under the various alternatives.

The West Hiline Draft RMP/EIS should also include a more detailed description of how the commitment to meet or exceed water quality standards will be accomplished (i.e., water quality/beneficial use maintenance monitoring and evaluation, and review to assure monitoring results are integrated into management decision making).

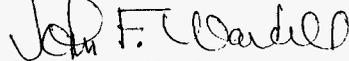
-2-

Existing wetlands resources within the Hiline resource area should be identified. A more extensive discussion of potential impacts to wetlands should be included in Chapter 4 for each of the alternatives.

In accordance with the criteria that EPA has established for rating draft environmental impact statements, we have rated this draft EIS as category EC-2 (Environmental Concern - insufficient information).

We would like to receive a copy of the Record of Decision when it is available. If you need further EPA assistance, please feel free to contact Lee Shanklin of my staff at (406) 449-5414 or FTS 585-5414. A summary of and references for specific plans to monitor and mitigate potential impacts to air and water quality should be provided.

Sincerely,



John F. Wardell, Director
Montana Office

Specific Reviewer: Steve Potts/Lee Shanklin, EPA Region VIII Montana Office

WEST HILINE DRAFT RMP/EIS

July 1987

General Comments:
Page 8

65 The Draft EIS states "that surface and ground water quality will be maintained to meet or exceed minimum State and Federal water quality standards". It should be emphasized that water quality standards are established to protect and maintain beneficial uses of water. The BLM's commitment to meet or exceed water quality standards means that BLM assures that its land management activities will not cause water quality deterioration to the extent that beneficial uses will be significantly impaired. We feel that the only way this commitment can be maintained is with implementation of a strong water quality monitoring program. Such monitoring is necessary to detect water quality degradation. Monitoring results then have to be integrated into the decision making process to assure that land management activities that cause watershed degradation are modified or halted before beneficial stream uses are significantly impaired. This plan should be developed and summarized in or included as an appendix to the EIS. It should include sampling parameters and frequency, and analytical methodologies or appropriate references.

66 The EIS also states on page 8 that ". . . BLM will comply with National and State Air Quality Standards". As with the preceding comment, a detailed monitoring and mitigation plan, and the criteria for its implementation, need to be provided or adequately summarized and referenced.

Page 8

67 The discussions of Soils Management should also include references to more detailed information on the methods for evaluating and reducing soil erosion and criteria for implementation of these activities.

Page 11

68 The RMP states that allotment management plans will be developed to improve riparian areas. A summary of the approach to be used would help. We would also like to request a copy of one of the allotment management plans for evaluation. The RMP also references a Montana Riparian Management Strategy. We also request a copy of this document.

Page 46

69 The definition of wetlands in this section identifies riparian areas as an extensive subset of wetlands including areas of widely differing features (i.e., lakes and pot holes). The variations in the characteristics of the areas listed as riparian or wetlands may directly affect the potential impacts and mitigations under all alternatives. It is also not clear whether some areas are considered wetlands but not riparian.

No. 65

The type of monitoring is dependent upon the type and location of the activity. Surface and groundwater quality would be maintained to meet or exceed minimum state and federal water quality standards.

Monitoring techniques, frequency and methodologies will be discussed at the activity plan level. For additional information please refer to the Water Resource Implementation section of the Management Common to All Alternatives description and the Monitoring and Evaluation section in Chapter 2 of this document.

No. 66

The BLM will evaluate impacts to air quality, at the activity plan level, and apply mitigating measures to ensure the continuation of the Class II airshed. Detailed monitoring and mitigation will be included in the activity plan.

For additional information please refer to the Air Quality Management section of the Management Common to All Alternatives description in Chapter 2 of this document.

No. 67

The methods used to make these evaluations are BLM Technical Note No. 346 (Erosion Condition Classification System) and the Modified Universal Soil Loss Equation Method developed by the USDA—Agricultural Research Station.

For additional information and text revisions please refer to the Soils Management Implementation portion of the Management Common to All Alternatives section in Chapter 2 of this document.

No. 68

Allotment management planning would consider riparian areas and their watersheds as a unit. Strategies to be considered include riparian pastures, stream corridor fencing, specialized grazing methods, winter grazing, use by a different species of livestock, and rehabilitation measures.

For additional information and text revisions please refer to the Riparian Area Implementation section of the Management Common to All Alternatives description in Chapter 2 of this document.

An allotment management plan and a copy of the Montana Riparian Management Strategy was provided.

No. 69

Some areas are considered wetlands but not riparian. Riparian areas are those areas within wetlands, geographically delineated by distinctive resource values and characteristics. Riparian areas are considered a component of wetland ecosystems.

The discussion on page 46 acknowledges the "... distinctive resource values and characteristics" which are used to "geographically delineate" riparian areas within wetlands. It would be helpful if these areas were specifically identified. The criteria for determining the "resource values and characteristics" used to delineate these areas should also be provided.

General Comment

70

This RMP lacks adequate identification and discussion of existing wetland resources in the West Hilline area, and potential impacts to wetland resources from implementation of the preferred alternative. Identification and analysis on wetland impacts should be expanded in this EIS.

Appendix 1.1

Based on the criteria listed in this appendix, it is difficult to determine how the term "Higher Value Resource Lands" is defined for a particular area or allotment. It appears that a particular piece of land could have conflicting resource values based on its surface and subsurface characteristics.

The application of this criteria and the definition of high value resource land impacts the evaluation of the possible affects from the proposed land disposition and acquisition plans. If an area is rated high for potential mineral resource but low for wildlife/livestock, is it retained? How is it evaluated against other areas such as one rated high for a cultural resource or recreation?

71

If the land to be retained or acquired has a high value for oil and gas resources, and if BLM's management of oil and gas development was more stringent than State requirements, then maintaining these lands under BLM activity could have a positive environmental impact. However, if the same area is rated lower than another area with more positive surface resource attributes like wildlife habitat, the negative impacts from less stringently regulated oil and gas developments may outweigh the positive aspects of retaining the wildlife habitat.

Without knowing how the criteria will be applied and prioritization scheme, it is difficult to assess the potential impacts for any particular configuration of BLM holdings.

Table 2.6 - Summary Impacts Table

Many of the negative environmental impacts specified in this table could be mitigated to varying degrees under all of the alternatives presented. The degree of mitigation which BLM might be prepared to undertake could significantly impact the comparison between the alternatives. It would be helpful to provide a similar summary of applicable mitigation techniques and the anticipated reduction to the impacts specified in Table 2.6 which would result from their implementation.

72

No. 69 cont.

Appendix 2.4 in the draft RMP/EIS lists the major riparian areas along the Upper Missouri National Wild and Scenic River. An extensive inventory has been completed that identified the general location of riparian areas (i.e., permanent streams, intermittent streams, potholes, etc.). An intensive inventory of riparian areas within the planning area is scheduled for completion by 1990.

Riparian areas were identified based on visible vegetation or physical characteristics, reflecting permanent water influence. Physical site characteristics include topography, aspect, gradient, elevations, soil type, influence by permanent water, water quality, and plant community.

For additional information please refer to the Riparian Area Implementation section of the Management Common to All Alternatives description of the Chapter 2 portion of this document and the Chapter 3 errata entry for page 46, column 2, paragraph 10.

No. 70

Existing wetland resources are discussed in Chapter 3 of the draft RMP/EIS. However, currently we do not have a complete wetlands inventory. We are in the process of doing an inventory, in cooperation with the Fish and Wildlife Service, for the Prairie Pothole Region.

Wetland impacts, specifically riparian, are addressed in the Impacts Common to All Alternatives section and in each alternative discussion (under the Vegetation heading) in Chapter 4.

Wetlands will be protected in accordance with provisions of Executive Order No. 11990, Protection of Wetlands. Under provision of this Executive Order, the agency must minimize the destruction, loss or degradation of wetlands when acquiring, managing and disposing of federal lands and facilities.

For additional information and text revisions please refer to the Water Resource Management section of the Management Common to All Alternatives description in Chapter 2 of this document.

No. 71

The higher value resource lands language in Appendix 1.1 has been revised to clarify that disposal of public land will be done, per FLPMA, to serve the public interest. This RMP effort applied BLM State Director's acquisition, retention, and disposal criteria to the lands in the planning area. The criteria which applies to each resource area is shown in Appendix 1.1. As a result of evaluating the lands in the planning area against the criteria, lands were identified for disposal. These lands are shown in Appendix 1.2 and on the Land Pattern Adjustment Map (Map 3).

For additional information and text revisions please refer to the Issue Specific Criteria of the Land Tenure Adjustment portion of Chapter 1 and Appendices 1.1 and 1.2 in this document.

No. 72

Measures to avoid or reduce environmental impacts have been designed into the proposed management actions. The remaining impacts are identified in Table 2.6. Additional mitigation measures might be applied, if further assessment of environmental concerns at the activity plan level indicate the need. Appendices 2.2 and 2.6 list mitigating measures to protect resource values.



September 2, 1987

Wayne Zinne, District Manager
Lewistown District Office,
Bureau of Land Management
Airport Road
Lewistown, MT 59457

Dear Mr. Zinne,

I am writing to comment on the West Hiline Draft Resource Management Plan with respect to its treatment of rivers potentially eligible for inclusion in the National Wild and Scenic Rivers System. Section 5(d) of the Wild and Scenic Rivers Act, P.L. No. 90-542, 16 U.S.C. requires all federal agencies to consider potential national wild, scenic, and recreational river areas in "all planning for the use and development of water and related land resources." 16 U.S.C. Sec. 1276(d). In our view, the planning responsibility imposed by this section requires the Bureau of Land Management to assess the values of potential Wild and Scenic Rivers on BLM lands during the preparation of resource management plans (RMPs).

Our preliminary investigation of a series of Bureau RMP's indicates that potential additions to the wild and scenic rivers system are being largely ignored in the planning process. We recognize that this oversight was due in large part to insufficient administrative direction regarding the BLM's responsibility to consider potential wild and scenic rivers in the planning process. No specific guidelines have been in force for the evaluation of such rivers.

In a memorandum dated July 23, 1987, however, the Director of the BLM issued draft guidance for the identification, evaluation, and protection of potential wild and scenic rivers on public lands. This draft guidance reinforces the responsibility of the BLM under the Wild and Scenic Rivers Act. It is adapted from the 1982 joint USDA/USDI interagency guidelines concerning potential system additions and is similar to internal direction adopted by the U.S. Forest Service in Chapter 8 of its Forest Planning Handbook. While this draft guidance is not yet finalized, we believe it constitutes clear recognition of the Bureau's responsibility to protect rivers on public domain land.

The Wild and Scenic Rivers Act establishes only two requirements for rivers to be eligible for inclusion in the national rivers system: 1) the river must be "free-flowing;" and 2) the river must contain one or more "outstandingly remarkable" value, including scenic, recreation, geologic, fish, wildlife, historic, cultural, or other similar values. 16 U.S.C. sections 1271, and 1273(b). Rivers which meet these threshold requirements are eligible for consideration as potential additions to the national rivers system.

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SUITE 303
WASHINGTON, D.C. 20003
202-547-6900

The study process as outlined in the USDA/USDI Interagency Guidelines for the evaluation of potential wild and scenic rivers and the Director's draft guidance is made up of three separate parts:

1) ELIGIBILITY ANALYSIS - Eligibility determinations should be made for all rivers and river segments identified for further study. These eligibility determinations should be made according to the statutory requisite qualities stipulated in the Act (free-flowing, and containing one or more outstandingly remarkable value). It is extremely important that proper segmentation of study rivers is made in the evaluation of eligibility. The presence of disqualifying factors on one stretch of river does not make the entire river ineligible. An eligible river segment can be very short; a four-mile segment of the Horsepasture River in North Carolina, for example, was recently added to the national rivers system. The USDA/USDI Guidelines clearly state that a river segment is of sufficient length if, when managed as a wild, scenic, or recreational river area, the outstandingly remarkable values are protected. In addition, segments of a river may be eligible although separated by a stretch of river found to be ineligible. Likewise, there is no specific minimum flow requirement for eligibility. The Guidelines state that flows are sufficient if they sustain or complement the outstandingly remarkable values for which the river would be designated. Thus, "outstandingly remarkable" scenic, botanic, wildlife, wilderness, geologic, historic, and other resource values may all exist within a river corridor regardless of stream flow levels.

2) CLASSIFICATION - All segments found to meet the eligibility criteria for potential inclusion in the national system should be classified according to the USDA/USDI Guidelines as potential Wild, Scenic, or Recreational Rivers. The potential classification of a river segment is important because, once found eligible, the BLM must provide interim protection for eligible segments up to the level of their potential classification. Here again, segmentation of the eligible rivers is pertinent.

3) SUITABILITY ANALYSIS - A river's suitability for inclusion involves a recommendation by the BLM regarding the proposed future of eligible and classified river segments. A segment may be recommended for inclusion in the national system, or may be recommended for other uses if appropriate to a river's resources. Suitability determinations are based on a river's resource values and other practical considerations.

The standard starting point for the evaluation of potential wild and scenic rivers is the National Park Service's 1982 Nationwide Rivers Inventory (NRI). However, since the NRI does not include Montana, the West Hiline planners must identify appropriate rivers through other means such as: the Pacific Northwest Rivers Inventory; public interest; professional judgement; state agency studies, reports and information; and natural heritage data.

It should be noted that in cases where the BLM has responsibility for an insignificant portion of the lands along a river deemed worthy of potential consideration as a wild and scenic river, the BLM is responsible for coordinating the river study with another group or agency identified as the lead agency for the river.

73 We respectfully request that you evaluate the rivers in the West Hiline planning area for their potential eligibility for inclusion in the national rivers system in accordance with the draft direction for rivers planning and protection contained in the Director's July 23, 1987 memo, and mandated by the requirements of the Wild and Scenic Rivers Act and the USDA/USDI interagency guidelines. We also ask that any rivers found eligible for inclusion be provided specific interim protection in accordance with their classification -- wild, scenic, or recreational -- until such time as detailed suitability studies can be completed.

As you can see from the enclosed New York Times piece, we have enjoyed a positive working relationship with the U. S. Forest Service. We believe that the BLM, too, is in excellent position to protect rivers under its own stewardship. We look forward to working with you in this important, publicly supported effort.

If you should have any questions please contact me or Jamie Fosburgh of this office.

Sincerely,


W. Kent Olson
President

No. 73

The river systems in Montana were not studied for potential inclusion in the National Wild and Scenic Rivers system during the original National Rivers Inventory.

Final guidance on handling the evaluation of potential Wild and Scenic Rivers in Montana has not been provided at this time. Interim management guidance for portions of rivers under BLM administration in the planning area has been provided in the Management Common section of Chapter 2 of this document. An example would be land acquisition and limitations on ORV use along the Marias River. Upon receipt of final guidance, the BLM will consider a plan amendment or update to evaluate the potential of rivers for inclusion in the National Rivers Inventory. Public opinion would be gathered at this time.

L.M. PETERSON, D.D.S.
Box 1750
Havre, Montana 59501

Telephone: 265-6413

Mr. Zinne,

I am opposed to commercial development of the Missouri river area. We certainly do not need concessions there nor are they desirable. Maintenance and improvement of camping areas at the crossings of the river is fine and an improvement on the visitor experience. Developed RV campgrounds is a different matter.

There was a time in the history of our use of wild scenic areas when the policy method was to construct access and accommodations to enhance visitor comfort. We have learned that such development works toward the loss of the "wild & scenic" we prize. The designated area of this stretch of the Missouri is narrow & easily disrupted. We are fortunate that the advances of "civilization" have bypassed this stretch to date. Lets preserve rather than destroy what we have.

Thank You

M. Peterson

(Typed exactly as received for reproduction in the Final RMP/EIS)



Chevron U.S.A. Inc.

6400 South Fiddler's Green Circle, Englewood, CO 80111, P. O. Box 599, Denver, CO 80201

Lisa Flesche Mercier
Staff Analyst
Legislative and Regulatory Affairs

September 3, 1987

West Hilline Draft RMP/EIS
BLM Montana

Mr. Wayne Zinne, District Manager
Lewistown District
Airport Road
Lewistown, MT 59457

Dear Mr. Zinne:

Chevron U.S.A. Inc. is the leaseholder of 9,000 productive and 25,380 nonproductive acres in the West Hilline Resource Area, and thus, we are very interested and concerned about the proposed RMP/EIS. There are several problems with your proposal that need to be addressed.

74 We are confused regarding the areas that would be closed to leasing under your preferred alternative. On page 9, it is stated in Table 2.2 that 41,385.23 acres would be in this group, and yet on page 107, the acreage closed to leasing in the high and moderate potential columns add up to 120,113 acres. Why is there such a discrepancy?

75 Chevron also questions how you can justify closing the recreational and scenic sections of the UMNWSR Corridor to oil and gas leasing. The Wild and Scenic Rivers Act only excludes wild rivers from leasing. You base your decision on the Solicitor's Opinion in Appendix 2.1, and yet from the information and maps provided in the document, we cannot determine if all of the recreational and scenic sections of the river are covered by that Opinion. Please explain.

Chevron is opposed to the designation of the Kevin Rim area as an Area of Critical Environmental Concern (ACEC). We believe that the BLM can "protect and prevent irreparable damage" to this area's important raptor habitat and cultural values under existing statutes and guidelines, such as the Rocky Mountain Front raptor guidelines in Appendix 2.9 and the Archaeological Resource Protection Act. Therefore, we do not understand why this area, which contains the oldest operating oil field in Montana, needs to be designated as an ACEC. Our industry's operations have not damaged these important values after all these years, and they won't in the future. On page 107 it is stated that an ACEC designation would "create a significant negative impact to oil and gas developers by increasing operation costs." We just do not believe that there is a good reason why we should be subjected to increased operating costs when these important values are currently being protected.

76 Chevron has a serious problem with the statement in the first full paragraph on page 29 under the caption "Kevin Rim Implementation," that the "BLM would use the guidelines to develop stipulations for new development on existing oil and gas leases." The BLM does not have the authority to develop new stipulations for new developments on existing oil and gas leases.

No. 74

The total acreage segregated from mineral entry, Table 2.1, plus the acreage managed under a no lease policy, Table 2.2, (110,638 acres) corresponds to the revised acreage figures given in Tables 4.1, 4.2, 4.3 and 4.4 in the errata section of this document.

No. 75

Please refer to response No. 37.

No. 76

The document has been revised to read "BLM would work with operators to apply the guidelines to new development on existing leases." For more information please refer to the Kevin Rim Implementation portion of the Alternative D description in Chapter 2 of this document.

Mr. Wayne Zinne

-2-

September 3, 1987

77 We do not understand what you mean at the bottom of the left column on page 29 where you propose a management zone "to ensure that development of federal minerals under private and state surface will be regulated, where authority exists, to follow the same guidelines implemented on the ACEC." The BLM does not have the authority to control the use of or impose stipulations upon private surface acreage.

78 In Table 4.4, page 107, the acreage figures on which the BLM plans to apply stipulations adds up to 1,121,467 acres. Comparing this amount with the figures in Table 1.1, page 2, we cannot figure out how you arrived at this amount.

In conclusion, Chevron cannot support your preferred Alternative D at this time due to all of the unanswered concerns and problems that we have pointed out. Thank you for the consideration of our comments.

Sincerely yours,



L. F. Mercier

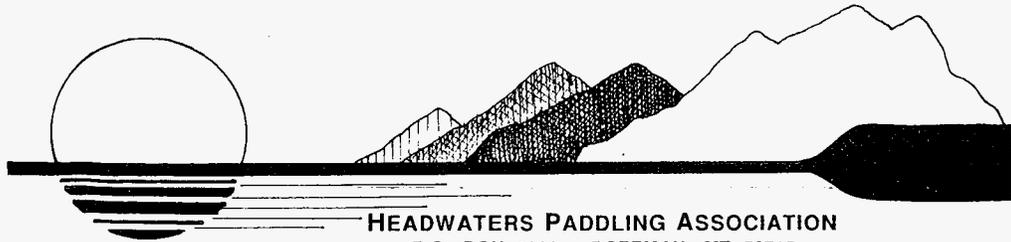
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No. 77

The management zone concept has been deleted from this RMP. For further information please refer to the response to comment 32.

No. 78

Please refer to response No. 29.



HEADWATERS PADDLING ASSOCIATION
 P.O. BOX 1392 • BOZEMAN, MT 59715

September 3, 1987

Mr. Wayne Zinne, District Manager
 Lewistown District, B.L.M.
 Airport Road
 Lewistown, M.T.

Subject: West Hilene Resource Management Plan

We are an association of over 100 river users from south central Montana who frequently enjoy the scenic and historic resources of the Upper Missouri National Wild and Scenic River (UMNWSR). Please consider the following comments regarding the draft management plan. We have attempted to respond to specific issues and alternatives where pertinent and are also submitting general comments regarding management of the UMNWSR.

127

79

Initially, we wish to formally protest the exceptionally short review period. Resource issues within the river corridor can best be studied and understood by floating all or a portion of the subject section. The logistics of such a float make it impossible for many interested parties to submit knowledgeable comments within the review period. We request that the deadline be extended at least an additional sixty days. Regardless of whether or not an extension is granted, please consider the following comments:

Land Tenure:

We strongly support a policy of acquisition, through exchange or purchase, of private lands within the boundary of the UMNWSR with emphasis on riparian areas. No B.L.M. lands within the corridor should be subject to disposal. Alternative C appears to most closely address these needs.

Off-Road Vehicle Management:

ORV use within the boundaries of the UMNWSR should be restricted to the greatest extent possible within wild and scenic sections. The basic values of remoteness, solitude, and silence, long recognized as fundamental assets of the UMNWSR, are completely compromised by the intrusion of ORV's. In addition, the visitor's associations with the rich historic heritage, the feeling of "experiencing" history is likewise destroyed. Alternative C most closely addresses these concerns. We support the closure of the Gist Ranch road before it drops into the Breaks to protect walk-in hunting values and the opportunity for solitude at this location.

No. 79

The public review period began on June 5 and ended September 3; a span of 90 days. For further information please refer to response No. 50.

Page Two

Right-Of-Way Location:

We support action which would most limit the impacts of utility lines within the UMNWSR boundaries. Alternative C is preferred.

Emphasis Areas:

Alternates C/D preferred for Cow Creek. The close historic association of the "Nez Perce Trail" with the river corridor should be recognized in management and interpretation.

UMNWSR Management:

Visitor Services: There does not appear to be any need to consider "limiting" the number of float opportunities at the present time. Determination of "capacity" based on "limits of acceptable change" is a reasonable approach. Alternatives C/D are preferred.

The visitor services center at Fort Benton serves a useful function at least from Memorial Day through Labor Day. The Ranger Station at Coal Banks also serves a significant number of floaters and should remain open through Labor Day. The Judith Landing station is of questionable necessity during any part of the season. Extension of the visitor services season through Thanksgiving does not seem warranted at any site. Alternative A (with the elimination of the Judith station) is preferred.

Interpretive facilities should definitely not include signs and displays on the river. These visual intrusions would be "forced" on all visitors regardless of their interest levels and would significantly detract from the impressions of remoteness and self-reliance which are of such fundamental importance. Interpretation of historic, archaeological, and geological resources is very important, but can be adequately addressed through displays at the Fort Benton visitor center and through photos and text in a "River Digest". We recommend that the "Digest" be expanded to include keyed maps (perhaps by incorporating an expanded "floaters guide"), geological and archaeological information, and that it be made available for purchase as well as on loan.

Recreational use of islands should be discouraged during the waterfowl nesting period, but should not be outlawed at any time. Use of islands, especially during the spring runoff, is at a relatively low level and disturbance to waterfowl would be minimal.

Facility Management: Emphasis should be placed on providing additional undeveloped sites at key locations. The most pressing facility development need on the river is for fencing around campsites to exclude livestock. Enclosures should also be constructed and maintained around young cottonwood stands to eliminate cattle impacts. Alternative C with the noted additions is preferred.

Page Three

Concession Management: Major concession services are not desirable or necessary anywhere within the corridor. Alternative A is preferred.

Health and Safety: The B.L.M. should continue to cooperate with State and local authorities of law enforcement operations, but should also seek internal enforcement authority to better control ORV use and violations of motorboat restrictions. Alternative A is preferred with additional authority to B.L.M. personnel.

In addition to these specific comments, please consider the following:

There has long been a pressing need for the B.L.M. to reduce livestock grazing pressures on riparian habitat within the UMNWSR corridor and to actively address the need to maintain and re-establish cottonwood stands. Why were these issues not addressed in the management plan?

In conclusion, we feel that the B.L.M. must continually strive to maintain the remote, undeveloped character of the Wild and Scenic Missouri. A sense of solitude and adventure can be severely degraded by unnecessary and inappropriate development and management. It is the undeveloped "wilderness" character that has always been the foremost asset of this unit of the Wild and Scenic River System. The B.L.M.'s primary management goal should be the retention of this special character.

Thank you for your consideration.

Sincerely,
Dick Ellis
 Dick Ellis
 Issues Committee
 Headwaters Paddling Association

No. 80

The scoping process did not identify riparian management within the Upper Missouri National Wild and Scenic River as an issue for this RMP. General land guidance for riparian management was brought forward in the Management Common to All Alternatives section from previous environmental impact statements. A Coordinated Activity Plan will be prepared for the Upper Missouri National Wild and Scenic River which will address riparian management in greater detail. The major riparian areas (listed in Appendix 2.4) may receive priority for intensive management during the life of this plan.

For additional information on riparian management please refer to the Riparian Area Implementation section of the Management Common to All Alternatives description in Chapter 2 of this document.



MONTANA WILDERNESS ASSOCIATION

District Manager Wayne Zinne
Lewistown District, BLM
Airport Road
Lewistown, MT 59457

Sept. 9, 1987

Dear Mr. Zinne:

MWA wishes to comment on the draft West HiLine RMP. I hope you will accept these comments in spite of their tardy submission; summer is a difficult time for volunteers to meet deadlines.

Land Tenure Adjustment.

MWA supports both the acquisition of lands in emphasis areas (Kevin Rim, the Hills, UMNWSR, Cow Creek) and areas of high wildlife value (e.g. Marias River, northern Blaine Co.) as per Alt. C, and the disposition (including sale) of isolated, uneconomical or marginally important lands as per Alt. E.

ORV Management.

The first sentence of the second criterium on p. 6 needs clarification. Also, the executive orders refer explicitly to conflicts with other (non-motorized) users - your criteria should include parallel language.

We support the Alt. C management proposal, with two modifications: 1) travel on roads and trails in sedimentary breaks type soils could be allowed on designated routes during wet conditions; and 2) seasonal restrictions in wildlife areas should require vehicles to use designated, not just existing, roads and trails.

I wish you had identified the management activities responsible for the projected budget increases noted on p. 31. I suspect that vehicle-use management may be a major additional expense. MWA strongly believes that such expense is warranted by the resulting benefits to surface resources and to non-motorized users.

ROW Location.

Alternative D is acceptable, with the following modifications: 1) no communication sites on Middle Butte; and 2) only existing corridors in the UMNWSR could be utilized.

Emphasis areas.

MWA endorses the Alternative C management proposal as written for the Kevin Rim, Sweetgrass Hills and Cow Creek areas. Regarding the UMNWSR, we support prescriptions from several alternatives, namely:

- a) the use of LAC to determine user capacity;
- b) seasonal closures of islands;

P.O. Box 635 • Helena, Montana 59624 • (406) 442-0597

No. 81

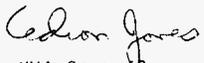
The off-road vehicle criteria has been revised. Please refer to the Off-Road Vehicle Issue Specific Criteria portion of Chapter 1 in this document.

No. 82

The decisions responsible for the projected budget increases are primarily the implementation of extended visitor services at Fort Benton, Coal Banks and Judith Landing (Alternatives B, C and D). In addition, Alternative C would require full BLM law enforcement responsibility within the Upper Missouri National Wild and Scenic River, while Alternative D would expand the BLM's role in law enforcement and search and rescue.

For additional information and text revisions, please refer to the Budget Assumptions section in Chapter 2 of this document.

- c) no interpretive activities (signs/displays) outside of launch/take out points;
- d) facility management as per Alt. A;
- e) concession management as per Alt. C, except for substituting the following language: "Outfitters may be restricted to a percentage of the daily user capacity";
- f) health and safety as per Alt. C.

Sincerely, 
Cedron Jones, MWA Council



Department of Energy
 Bonneville Power Administration
 P.O. Box 3621
 Portland, Oregon 97208-3621

SEP 8 1987

In reply refer to: SJ

Mr. Wayne Zinne, District Manager
 Lewistown District Office
 Bureau of Land Management
 US Department of the Interior
 Airport Road
 Lewistown, Montana 59457

Dear Mr. Zinne:

Bonneville Power Administration (BPA) has reviewed the Draft Environmental Impact Statement (EIS) for the West HiLine Resource Management Plan.

BPA has no comments on the proposed management plan. We are writing to express our appreciation for the excellent job you did of addressing energy transmission corridors in the EIS.

Thank you for keeping us informed of your planning activities.

Sincerely,



Anthony R. Morrell
 Environmental Manager

132





EDUCATION - CONSERVATION

Montana Wildlife Federation

AFFILIATE OF NATIONAL WILDLIFE FEDERATION

P.O. Box 3526
Bozeman, MT 59715
(406) 587-1713

September 9, 1987

Mr. Wayne Zinne, District Manager
Lewistown District, BLM
Airport Rd.
Lewistown, MT. 59457

Dear Mr. Zinne:

Please accept these comments on your West HiLine Resource Management Plan as they relate to that portion of the Missouri River designated as wild and scenic. We acknowledge that the comments are being submitted after your public comment deadline. Since the comment period was so brief we are hopeful you will accept them anyway.

The Montana Wildlife Federation is a citizen group of around 4,600 sportsmen in Montana and elsewhere. Our concerns center on maintaining quality hunting and fishing in Montana through conservation of wildlife habitat. It is in this light that we register these comments.

We are concerned about the plans you have made which increase development along the wild and scenic corridor. We feel that this designation should direct management of the corridor toward maintaining its wild character and minimizing the extent of development or even of human presence in the form of signing and displays. This is a special stretch of the Missouri River which people use because of its wildness. Human presence and further development can only degrade this quality.

OFF-ROAD VEHICLE MANAGEMENT:

We are opposed to ORV use along the river corridor. We are concerned about the effects of erosion and the spread of noxious weeds as well as the impacts on wildlife and the threat to riparian areas along tributaries within the management area. Again, the wildness of the area should be paramount along this stretch of river. ORVs not only impact the ground but also invade peoples' solitude and privacy.

LAND OWNERSHIP PATTERNS:

We have consistently supported blocking up of public lands. Where we feel caution is necessary is in being certain that lands to be traded out of in case of trades are of little value to the

THE WEALTH OF THE NATION IS IN ITS NATURAL RESOURCES

public in terms of their wildlife resources. We support the use of Land and Water Conservation Funds to purchase lands in important wildlife areas. It is likely that lands you are considering would fall under this category.

VISITOR SERVICES:

We are opposed to increased signing or any interpretative displays in the wild and scenic corridor. This, like ORV use, would degrade the wild quality of the river and detract from its value under this designation.

FACILITY MANAGEMENT:

We endorse Alternative A for the section on Facility Management. We urge you to keep the sites as undeveloped as possible, just providing for sanitation in the event of increased use of the river. Again, more development detracts from the aesthetic value of the corridor as wild and scenic.

CONCESSION MANAGEMENT:

We are thoroughly opposed to the development of any major concessions in any area of the river corridor. We support Alternative A. The thought of marinas, RV parks, etc. in a wild and scenic river corridor is untenable. These concessions have no place around or near a wild and scenic river. Their presence would belie the very concept on which this designation was given and would be highly detrimental to people who look to that designation as a form of protection for a valued stretch of river.

We agree completely with the comment by the Medicine River Canoe Club that "This river corridor is a magnificent heritage that should be preserved as nearly as possible in its natural state. It gives man an opportunity to step back in time, to reflect, to enjoy and to appreciate moments of history."

Thank you for considering our comments. We look forward to a favorable response to their substance.

Sincerely,



Tony Schoonen
President



UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE

U.S. Fish & Wildlife Enhancement
Federal Bldg., U.S. Courthouse
301 South Park
P.O. Box 10023
Helena, Montana 59626

IN REPLY REFER TO:

FWE-61410

September 9, 1987

To: District Manager, Bureau of Land Management, Lewistown District,
Lewistown, Montana

From: Field Supervisor, Montana-Wyoming Field Office, Fish & Wildlife
Enhancement, FWS, Helena, MT (FWE-61130)

Subject: Review of Draft West Hilina Resource Management Plan/EIS (ED#
87/5)

We have reviewed the subject draft and have no comments on the document.

cc: Suboffice Coordinator, USFWS, Billings, MT (FWE-61410)
USFWS, ES, BEC, Washington, D.C.

DC/tz

Belt, Montana
Sept. 3, 1987

Wayne Zinne, District Manager
Lewistown District B. L. M.
Airport Road
Lewistown, Montana 59457

Dear Mr. Zinne,

Thank you for providing the Draft of the West Hi Line Resource Management Plan and the Environmental Impact Statement.

Alternatives C or D are favored for Cow Creek, listed on page 34.

The following comments pertain to Management of the Upper Missouri National Wild and Scenic River:

Visitor Services:

Alternative C is favored with the exception that portions of some islands could accommodate camping use at times and places where no significant resource damage is indicated.

Facility Management
Concession Management
Health and Safety

On all three of these Alternative A is preferred.

During the many years that protection of the Missouri River was being considered, a subject that frequently came up was the extent of visitor use and how it could be managed consistent with minimizing resource damage. L. A. C. addresses this issue but concession services would accelerate visitor use and is not consistent with the purpose of the Wild and Scenic Rivers Act.

The National Park Service produced the first report which described the numerous values of this stretch of river. The Park Service planners were striving to disperse crowds from other parks and to impress Congress. With large numbers they projected river use figures that were unacceptable to those working toward river protection.

The Bureau of Land Management was selected to manage the Wild and Scenic River because it was the agency most likely to maintain the river as it had been and had no reason to promote and increase visitor use.

Resource Management should have been included as an additional category. Several subjects could have been addressed under this heading, such as management of cottonwood groves.

Throughout much of the corridor above the C. M. R. only old growth cottonwoods exist. Reproduction can only be found where protection from livestock is provided.

Other resource management subjects could have been included.

Sincerely,



Wale A. Thoreson
120 Thoreson Road /
Belt, Montana
59412

State of Montana
Office of the Governor
Helena, Montana 59620
406-444-3111

TED SCHWINDEN
GOVERNOR

September 15, 1987

Mr. Wayne Zinne
District Manager
Lewistown District
Bureau of Land Management
Airport Road
Lewistown, Montana 59457

Dear Mr. Zinne:

The State of Montana appreciates the opportunity to review and provide comments on the Bureau of Land Management's West Hilline Range Management Plan/Environmental Impact Statement (RMP/EIS). The attached comments were prepared from comments submitted to my office by the Montana Department of Fish, Wildlife and Parks as a result of a review of the RMP/EIS by the state's Interagency Planning Task Force.

Thank you again for the opportunity to comment.

Sincerely,


TED SCHWINDEN
Governor

Enclosure

STATE OF MONTANA
COMMENTS
ON
BUREAU OF LAND MANAGEMENT
WEST HILINE RANGE MANAGEMENT PROGRAM
DRAFT ENVIRONMENTAL IMPACT STATEMENT

Appendix 1.1 of the RMP/EIS includes a list of land tracts that may be suitable for disposal through land adjustment actions. Several of the tracts included in the list are large in size and include significant wildlife habitat and potential public recreational opportunities. Wildlife values on tracts of 320 acres or greater should be thoroughly evaluated before these tracts are included in a land exchange proposal. Several of these tracts offer important "islands" of wildlife habitat and in some cases are surrounded by substantial areas of land committed to intensive agricultural activities, such as grain growing. This is especially true in deer hunting district 610 and 612.

Public access to public lands for recreational purposes is an important issue. The Bureau of Land Management's (BLM) land tenure adjustment program should continue to carefully consider the importance of preserving existing access opportunities, while securing additional access where possible.

The RMP/EIS indicates that the preservation and establishment of riparian areas around West Hiline fishing reservoirs is a goal of the management plan. The uncontrolled use of these areas by cattle, however, can work to the detriment of this goal. It is suggested that the use of fencing, stock tanks and watering corridors will enhance the possibility of achieving the program's riparian area goals while still allowing sufficient access to water sources for cattle. The number of sport fishing reservoirs in the planning area is relatively small, and should not present an unreasonable burden for the BLM in implementing these types of riparian protection measures. The example of fencing and stock tank provision for Reser Reservoir in Blaine County is a good example of achieving optimum multi-purpose use of BLM reservoirs.

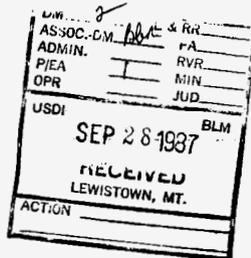
The Montana Department of Fish, Wildlife and Parks recommends that Burns and Glynda Reservoirs be deleted from BLM's request for fish stocking (page 12, 2nd column, 2nd paragraph of the RMP/EIS). The department considers these reservoirs to be unable to support sport fisheries of any kind.

No. 83

We concur with your recommendation and Burns and Glynda reservoirs have been deleted from BLM's request for fish stocking.



Ethnoscience
711 Rimrock
Billings, Montana 59102
Phone: (406) 252-7945



Wayne Zinne
District Manager
Lewistown District Office
Bureau of Land Management
Airport Road
Lewistown, Montana 59457

Dear Sir:

I am writing in order to comment on the Draft West HiLine Resource Management Plan Environmental Impact Statement. I have comments on two issues, the treatment of cultural resources in general and the specific treatment of the Sweet Grass Hills.

Cultural Resources.

1. None of the alternatives in the RMP treat cultural resources in an active fashion. No alternatives are presented which really involve managing these resources. The plans for action are reactions to leases or land exchanges. One consequence of this is that the BLM is presenting a document that strongly implies that cultural resources at best will always be considered of secondary importance in any resource management decision. This is inappropriate given BLM's mandated FLMPA and NEPA responsibilities.

At a minimum Alternative C should consider developing regional cultural resource management strategies based on the number of acres already inventoried, the nature and classes of sites found, their distribution relative to topographic and other environmental variables, and the scientific, heritage and public educational values these resources represent. The development of this archaeological data base and its concomittant management strategies would give BLM decision makers the tools they need to make systematic and defensible decisions concerning cultural resources prior to decisions to lease or make land exchanges.

No. 84

Cultural resource management was not identified as a planning issue in this RMP. The management of cultural resources in the planning area will continue in accordance with BLM policies, manuals, and regulations.

All alternatives in the RMP would provide for the enhancement and protection of cultural resources. Cultural resources would be given full consideration in all management decisions, and activity plans may be developed for significant cultural resources on public lands.

For additional information please refer to the Cultural Resource Management section of the Management Common to All Alternatives description in Chapter 2 of this document.

85

2. Cultural resources are only dealt with in the overall section and not explicitly in the discussion of each alternative. This appears to be inappropriate because the different alternatives will have different effects on cultural resources. For example, any increase in the amount of recreational traffic in archaeologically sensitive areas will have negative impacts on archaeological resources which will need to be mitigated by positive actions on the part of the BLM. Vandalism is a major concern in the preservation of cultural resources. Nowhere in this document is this issue considered.

Sweet Grass Hills

1. Although Native American concerns about preserving the the natural environment of the Sweet Grass Hills are noted in the RMP, the central underlying issue is not addressed. In my view, the basic conflict between the hard rock mining uses of the area and the continuing use of the area for traditional religious purposes can not be adequately addressed without considering apparent conflict between the First Amendment to the Constitution, the 1872 Mining Act and P.L. 95-341, AIRFA. While the West Hilline RMP is certainly not the vehicle in which to make legal decisions concerning this issue nor are long complex discussions of constitutional law appropriate, it is misleading to the public not to acknowledge that the conflict over these two uses of the Sweet Grass Hills has serious far-reaching legal implications that extend far beyond the immediate issue whether to allow a mining haul road to be build in a traditional vision questing area. A brief (1 paragraph) discussion of the major points of each of these legal documents as they relate to these issues should be included in the initial discussion of the uses of the Sweet Grass Hills.

86

2. All alternatives except C call for the revoking of the Bureau of Reclamation withdrawl of 529.67 acres on the East Butte. This would result in this area being made available for mineral entry and this in turn would result in significant negative impacts on the religious use of the

No. 85

The impacts to cultural resources from implementing each alternative are discussed in Chapter 4 of the draft RMP/EIS.

All alternatives would provide for the enhancement and protection of cultural resources. This would include the protection of archaeological sites from vandalism.

For additional information please refer to the Cultural Resource Management section of the Management Common to All Alternatives description in Chapter 2 of this document and pages 85, 92, 101 and 110 in the draft RMP.

No. 86

The conflict between mineral extraction and Native American religious practices is acknowledged in the draft RMP/EIS (page 79). It is beyond the scope of this document to outline the provisions of the conflicting laws.

area. More appropriate action, given the ongoing dispute between these two uses of the area, would be for the BLM to consider Alternatives A, B, and D where the two interested parties are allowed to petition the BLM to consider various compromise management strategies. For example, an advisory board made up of industry and Native American representatives could be set up and charged with suggesting pathways which would allow for dual use of the Sweet Grass Hills. As it stands the BLM appears to have already decided on giving precedence to the mining industry.

On the other hand, if this is indeed a policy decision that the BLM has already made, then the rationale for this policy should be included in the RMP. Further a statement concerning the high probability that this policy will result in further legal actions brought by Native American groups against the BLM should be included.

87

3. Note should be made of the fact that the religious use of this area also includes Canadian Indians, Blackfeet and Stoney and thus this issue may have international implications.

141

88

Finally, I have one general comment about the nature of the RMP in general. Montana is a pluralistic society. It has within its borders many different tribal groups in addition to the dominant Anglo-Saxon majority. All of the comments and assessments concerning Social Setting/Lifestyles in the RMP are couched and measured in terms of the value systems of the dominant Anglo-Saxon majority (eg. pg 76). (This is also true of every other RMP and EIS I have ever read.) It is unrealistic to expect that all measures of all value systems be included in all documents of this nature, but I would like to take this opportunity to point out the inherent bias this creates in the document. If you start from the assumption that social well being can be accurately measured by "the number of physicians, crime rates, income, education, employment and household conveniences" then it is built-in that the culturally dictated necessity for solitude in religious/cultural life will not be considered important to social well being. This is patently incorrect for many

No. 87

BLM has noted the Sweet Grass Hills Area of Critical Environmental Concern is unique because of its traditional religious importance to Native American tribes including the Blood and Stoney. However, the BLM does not have documentation of the Blood and Stoney utilizing the area for religious purposes.

For additional information and text revisions please refer to the Sweet Grass Hills section of Chapter 3 in the draft RMP/EIS and the Chapter 3 errata entry for page 62, column 1, paragraph 10.

No. 88

The terms and indicators of social well-being are simply an inference and are not meant to be a direct measurement of social well-being or all encompassing. The text has been revised to clarify the measurement of social well-being.

A discussion is included in the Social Setting/Life-styles section on the traditional religious practices of Native Americans in the area and the necessity for uninterrupted solitude and other characteristics sought for the practice of their religion. There is also a discussion on traditional religious activities that occur in the Sweet Grass Hills on page 62 of the draft RMP.

For additional information and text revisions please refer to the Sweet Grass Hills section of Chapter 3 in the draft RMP/EIS and the Chapter 3 errata entry for page 76, column 1, paragraph 2.

Native Americans in Montana. In the future, I would hope to see that the BLM preparers of RMP EISS consider the values of all the inhabitants when they construct their measures of social well being and lifestyles.

Thank you for the opportunity to comment on this document.

Sincerely,



Sherri Deaver
Senior Ethnographer

cc. Curly Bear Wagner, Blackfeet Cultural Committee
Cynthia Manning Hamlett, USFS
Jane King, Tetra-Tech
Marvin Keller, President MAA

Chief of The Blackfeet Nation**Earl Old Person, Chief**

P.O. Box 486
 Browning, Montana 59417
 (406) 338-7521 or 338-7276



October 6, 1987

Mr. Wayne Zinne, District Mgr.
 Lewistown District Office, BLM
 Airport Road
 Lewistown, MT 59457

Dear Mr. Zinne,

Although we missed the deadline for comments on the draft West Hi-Line Resource Management Plan, I hope that you will accept our late comment in the spirit of the government to government relationship which President Reagan has sought to develop.

The Sweetgrass Hills are a very important part of the religious and cultural heritage of the Blackfeet Tribe. Camping places there were used year after year. We hunted in these hills and used certain areas to teach hunting skills. Religious experiences were sought and received in these areas. We sold these lands in 1888 under great pressure because many of us were starving and we were told that the money from the cession would make us self-sufficient. The date of the cession became a bench-mark in our oral history. A recent study by your Agency suggests that there are over 4,000 cultural sites in the Sweetgrass Hills area.

The Blackfeet Tribe supports Alternative C, as it offers more protection for these important sites. The area should be segregated from mineral entry. The middle Butte should be included in the ACEC protected area. Our comments in our December 8, 1986 letter to you is the basis for our continued preference for Alternative C.

In addition, we would like to see included a provision for temporary area closures to enable our members to exercise their religious rights without interference. The Lewis and Clark Forest Plan does include a provision on this, so I am enclosing a copy of that page of the Forest Plan.

If you have any questions about our comments, please contact Curly bear Wagner, Director of the Blackfeet Tribal Cultural Program.

Sincerely,

Earl Old Person, Chairman
 Blackfeet Tribal Business Council

enc.

143

89

90

No. 89

Under the proposed alternative, Middle Butte would be designated as part of the Sweet Grass Hills Area of Critical Environmental Concern.

No. 90

Your request to have temporary closures for traditional Indian religious practices in the Sweet Grass Hills will be considered in the Area of Critical Environmental Concern Activity Plan, which will be prepared following the approval of this RMP.

**FOREST-WIDE
MANAGEMENT STANDARDS****Human and Commu
Development H-2**

(3) Implement a special-use permit system for needed temporary area closures, to enable Native Americans to exercise their religious rights without interference.

(4) Expand Forest programs which promote employment for Native Americans.

(5) Consult with the Blackfeet Tribe regarding the establishment of proper procedures to implement the American Indian Religious Freedom Act. Using as a basis President Carter's 1978 Report to the Congress on that Act, the Forest Service will negotiate an agreement with the Blackfeet Tribe on this issue.



Roosevelt Memorial Dedication, 1931.

Forest-Wide Management Direction

BLACKFEET NATION

P.O. BOX 850

BROWNING, MONTANA 59417

(406)338-7179

EXECUTIVE COMMITTEE

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 ARCHIE ST. GODDARD, VICE CHAIRMAN
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 GEORGE KICKINGWOMAN
 TED WILLIAMSON

December 5, 1986

DEC - 8 1986

Ms. Nancy Cotner
 State Director
 Bureau of Land Management
 Great Falls Resource Area
 P. O. Box 2865
 Great Falls, Montana 59403

Re: West Hi-Line Resource Management Plan

Dear Ms. Cotner:

The Blackfeet Tribe considers the Sweetgrass Hills Area to be an important site for both religious and cultural resources. Spiritually, the Hills have been and continue to be the site of religious experiences for members of this Tribe as well as for Indians of other Tribes. Culturally, the Hills have been the site of battles and were regularly used for hunting as well as to practice hunting. We feel that the important of the Sweetgrass Hills to us merits their designation as a special management area.

Regarding your Table of Alternatives for the West Hi-Line Resource Management Plan, we offer the following comments:

1. The middle Butte of the Sweetgrass Hills should be included in the Resource Management Plan.
2. In general, the Blackfeet Tribe approves of Alternative C under the Sweetgrass Hills issue. We do however, feel that the use of the area for public recreation may cause privacy problems of those Indians seeking religious experiences. We definitely support your pursuit of a protective withdrawal from mineral entry.
3. We approve of Alternative C concerning revoking the Reclamation withdrawal of East Butte.
4. We approve of Alternative C under Land Tenure Adjustment. We hope that the Bureau of Land Management could acquire more lands in the Sweetgrass Hills area.

5. We approve of Alternative C regarding off-road vehicles. We believe the use of off-road vehicles should be limited to designated roads and trails.

6. We approve of Alternative C regarding rights-of-way; these should be avoided in the Hills area.

7. Regarding communication sites, we believe the communication site on Mount Royal disrupts our religious use of the Hills and should be removed.

8. We believe the Buffalo Jump site on Kevin Rim should be protected from pot hunters and others who would damage its cultural value, therefore we would in general agree with Alternative C on that issue.

91 We would like more information about the current mineral status of the Sweetgrass Hills, as well as some information about the procedure to withdraw it from mineral entry. We would appreciate being notified of any planned development in the Hills and would be willing to walk the land of any such proposed development as you prepare any site-specific analysis.

We continue to be interested in the protection of the site of our first Treaty signing at Judith Landing.

If you have any questions about our comments, please contact Curly Bear Wagner, Director of the Tribal Cultural Program.

Sincerely,

EARL OLD PERSON, Chairman
Blackfeet Tribal Business Council

EOP/tag

Bureau of Land Management
Great Falls, Montana

DEC - 8 1986

Great Falls, Montana

No. 91

For information about the current mineral status in the Sweet Grass Hills please refer to the errata entries for page 45, column 2, paragraphs 1 thru 4; and page 64, column 1.

The general procedures for withdrawing public lands and interests therein can be found in 43 CFR 2310.1. A justification for withdrawing public lands from all forms of entry must exist. The West HiLine could become the justification and environmental analysis for withdrawal of the Sweet Grass Hills under Alternative C. If Alternative C was selected, then the procedures in 43 CFR 2310.1 would have to be implemented.

Public Meeting Havre, Montana July 13, 1987

Formal Statements

92 | My name is Arthur Roth, from Big Sandy, and I fail to see how you can implement a management plan in these scattered tracts when the majority of the land is deeded land around those tracts. In reading that report I saw where they said the crucial wildlife management areas showed all of the whole area as crucial for antelope, so the fact of the matter is, I wondered if you need to use the word crucial because all habitats are crucial and I don't quite see where very many areas are crucial compared with others.

My name is Mark Swinney, I'm with the BIA, Rocky Boys Agency, today, my comments I submitted to the NCRA but I would reiterate that the best plan in the world doesn't do much good without staff and funding, and I've observed that you fellows are in the same boat we are, we've got a lot of country to cover with little money and little staff, and it's harder to implement plans without either one, which seems to me that this plan is typical of all bureaucratic plans - we don't get any money or staff. We've got good plans, but nothing to implement them with, and we need to get those things and get some people available to work with the ranchers more than one to every two or three hundred or something similar, and that's my comment over and over again.

No. 92

The only crucial antelope ranges on Figure 3.2 are delineated by a dotted line and are found in northern Liberty County, southern and northern Blaine County, and eastern Chouteau County. Crucial wildlife habitat is defined in the glossary as parts of the habitat necessary to sustain a wildlife population at critical periods of its life cycle. This is always a limiting factor on the population, such as breeding habitat, winter habitat, etc.

93 1) Why didn't BLM schedule any public meetings to discuss the draft RMP on Indian Reservations? How were Native Americans consulted in the public input process?

94 2) What criteria did BLM use in the Draft RMP to identify public lands as suitable for disposal? Do you exchange acre for acre? Can BLM define the term small when used in land tenure adjustment? Is size one of the value factors used to identify tracts of public land for disposal? Why are some of the bigger tracts (2,000 acres) included in the disposal category?

95 3) How does the RMP handle the disposal of public lands? When BLM decides to proceed with the disposal of a tract of public land, is that tract listed or advertised?

96 4) Is the purpose of this plan to exchange land that isn't so valuable for land that is, and is accessibility to BLM land of primary importance? Is BLM trying to acquire public access to larger tracts of public lands, even if those tracts are identified for disposal? Could you get a right-of-way for public access to BLM land?

97 5) Do you have a preferred alternative?

98 6) If you decide to put a campsite on public land do you have to go through an Environmental Impact Statement? What level of planning is involved?

No. 93

The BLM scheduled public meetings in central locations to afford the most convenience for public attendance. The BLM has continually consulted with all Tribal Councils within the RMP area. This consultation has taken the form of briefings, letters and phone calls to the Tribal Councils throughout the planning process.

No. 94

The criteria used to select public land for disposal are listed in Appendix 1.1. Land exchanges are based on appraised value rather than acre-for-acre comparisons.

BLM did not define the term small, as used in land tenure adjustment, instead resource values were evaluated against the criteria in Appendix 1.1.

Size is not one of the value factors used to identify public lands for disposal.

Large tracts of public land are identified for disposal if they met the disposal criteria in Appendix 1.1.

No. 95

Disposal of public lands can occur through private or state exchanges or public sale.

The public land sale can occur by competitive or modified competitive procedure. Public lands put up for sale are listed in local newspapers and the Federal Register. Sales can be direct sales to individuals if warranted. These sales are also listed in local newspapers and the Federal Register. The BLM would primarily use exchanges to accomplish public land acquisition and disposal rather than sale.

No. 96

A purpose of this RMP is to identify public lands that can be used to exchange for private or state land that would be in the public's interest to acquire.

Access to public land and private land with public values worth acquiring are factors considered when an exchange proposal is evaluated.

The BLM is not trying to acquire access to public lands that are suitable for disposal, regardless of size.

No. 97

Alternative D, as modified in this final, is the proposed alternative.

No. 98

All proposed developments on public land are analyzed for impacts prior to development. Developments which are not highly controversial or involve significant impacts (such as campsite development) are addressed in an environmental assessment, not an environmental impact statement.

99 7) You bring in money from minerals and grazing, how much do you bring in from recreation and how is this money spent?

100 8) On land exchanges and purchases, what does the plan propose for the mineral estate?

101 9) What kind of criteria were used in deciding which areas are open and closed for ORV use?

102 10) How will ORV use be enforced? Do you have the authority to enforce ORV use similar to the authority to issue trespass and enforce grazing rules and regulations?

103 11) How often do you do an RMP for an area?

104 12) How does Alternative D approach improving the condition of over utilized rangeland?

105 13) If you presently have a problem in management common, will that same problem carry into the new plan?

No. 99

Very little money is added to the federal treasury from fee collection for recreational activities on public lands in the RMP area. Commercial outfitters are charged a minimum of \$50/year or 3% of their gross receipts, for a BLM permit. There are about 10 permitted outfitters per year. Map sales produce some revenue which is used to print additional maps.

Recreation fees collected by BLM are placed in the U.S. general treasury.

No. 100

BLM's policy is to avoid split estate situations. Each sale or exchange proposal would be evaluated on an individual basis because of the complexity of mineral ownership and mineral evaluations. Most sales and exchanges of the past have reserved the mineral estate for the federal government. Mineral estate can be disposed of for fair market value.

No. 101

Public interest for proper resource utilization, safety, and environmental protection would be used to determine the need for off-road vehicle use restrictions under the limited or closed designations.

For additional information please refer to the Off-Road Vehicle Issue Specific Criteria portion of Chapter 1.

No. 102

BLM enforcement of off-road vehicle designations is implemented through cooperation with off-road vehicle users, patrols and citation if necessary.

No. 103

RMPs are prepared to provide guidance for a period of 10-15 years. They are monitored and maintained yearly, and are reviewed every 5 years to determine if guidance is valid. New issues or outdated guidance may result in plan amendments or preparation of a new RMP.

No. 104

Previous direction for improving rangelands, through grazing management practices, has been provided in the Missouri Breaks Grazing Environmental Impact Statement and Prairie Potholes Grazing Environmental Impact Statement. The guidance from these documents has been incorporated in Management Common to All Alternatives.

The decisions resulting from these documents will continue to be implemented and monitored to determine the effectiveness of on-the-ground actions in achieving resource management objectives.

No. 105

Existing management guidance has been reviewed and valid guidance has been incorporated into the Management Common to All Alternatives section.

- 106 1) When BLM sells a tract of land, where does the money go?
- 107 2) How does BLM define semi-developed and developed campsites when discussing the UMNWSR?
- 108 3) Under the preferred alternative, what is the most extreme type of concession development that could be allowed? Is it possible that I could find a KOA by some BLM land?
- 109 4) Under the preferred alternative what type of development would be allowed at interpretive sites along the UMNWSR? What sites along the UMNWSR qualify for interpretive development? Does BLM interpret KOA campground type of concession development, allowed in the preferred alternative as consistent with Wild and Scenic River Areas, under the Act? Could the BLM produce and distribute the floaters guide as an alternative to constructing interpretive signs along the UMNWSR?
- 110 5) How does the draft RMP address noxious plant management?
- 111 7) Where could this concession development occur along the UMNWSR?

No. 106

Finances from the sale of public lands in Montana are distributed as follows: 4% to states and counties; 20% to the general fund; and 76% to the Reclamation Fund.

No. 107

Semi-developed sites are those with some capital improvements and camping use is fairly frequent.

Developed sites are those areas with tent or trailer spaces, potable water, access roads, refuse containers, pit or chemical toilets, and qualify for fee collection under the Land and Water Conservation Act of 1965.

No. 108

Developments permitted on BLM-administered land would be determined by need (demand) and economic feasibility. Under the proposed alternative, private sector initiatives such as a KOA campground would be allowed if they meet these criteria.

No. 109

Self-guided interpretive study development may be allowed at appropriate geological, historical, cultural, paleontological or natural areas. This development may include interpretive signs and displays. Sites which could be developed include: Stafford Ferry, Cow Creek, Evans Bend, Steamboat Point, Little Sandy, and Hole-In-The-Wall. Other sites may be added as needed.

Private sector initiative, such as a KOA campground could be considered if there is need (public demand) and it is economically feasible. The proposed alternative states that these developments on public land would be permitted only in recreational segments of the river and must be consistent with the Wild and Scenic Rivers Act, as amended.

A Floater's Guide is available and has been used extensively as an interpretative tool. However, it can't address all the specific data on the numerous resources of the river ecosystem. This void could be filled with interpretative techniques such as signs.

No. 110

The BLM will control and/or eradicate noxious plants on public lands administered by BLM under cooperative agreements with county weed boards. If weed problems occur in a checkerboard ownership pattern the BLM will initiate control measures in conjunction with other landowners.

For additional information please refer to the Grazing Management Implementation (vegetation related) portion of Chapter 2 of this document.

No. 111

Such developments could occur only in the Recreational segments of the UMNWSR. These segments are shown on Figure 3.8 in the Draft document.

112 8) Does BLM envision private concessionaires assuming some of the river management duties (currently your river rangers are volunteers or employees)? Are there existing concessionaires? What would a concessionaire get in return for doing this?

113 9) What services could concessionaires provide and would they collect fees from the public? Would you compensate them for taking on river management?

114 10) Is there currently a no wake speed restriction in the recreational segments of the UMNWSR? Where are the recreational segments of the river?

115 11) How does the preferred alternative propose managing the Marias River? Does the BLM have some land along the Marias River? How can the public find these lands?

116 12) How does the preferred alternative handle logging in the Sweet Grass Hills? Does this alternative protect the watershed in the advent of an active logging program? What is the current level of logging activity in the Sweet Grass Hills?

No. 112

BLM would continue its administrative responsibilities however, private sector initiatives could provide some visitor services. River outfitters permitted by BLM are considered to be concessionaires. The concessionaire would profit financially from service fees.

No. 113

Private sector initiatives could be used to provide a wide variety of services. These services could include providing supplies or major lodging facilities. Services would depend on need and economic feasibility. BLM would have the option of compensating private sector initiatives on a case-by-case basis. An example might be contracting for litter pickup.

No. 114

Only wild and scenic segments of the Upper Missouri National Wild and Scenic River have a no-wake restriction, not recreational segments. Figure 3.8 of the draft RMP shows recreational segments of the river.

No. 115

The proposed alternative identifies the Marias River as an acquisition area, limits off-road vehicle use on public lands along the Marias, and requires BLM to participate in developing instream flow recommendations.

BLM does administer some land along the Marias as identified on Map 1 in the back of the draft RMP.

The map is a good method for the public to locate public lands however, most of the public tracts along the Marias are unsigned and don't have legal or physical access.

No. 116

There is currently no logging on BLM lands in the Sweet Grass Hills and this area is not considered commercial forest land by the BLM.

The proposed alternative may allow the negotiated sales of forest products in the Sweet Grass Hills. The possible sale of forest products will be addressed in an activity plan.

Stipulations to protect resources, including the watershed, would apply to any timber sale which might occur.

- 117 13) How does the RMP address water quality with respect to mining activity?
Do you test for water quality before any activity takes place?

- 118 14) What restriction does the preferred alternative impose on ORV use of the
UMNWSR corridor? Do those restrictions change among management segments?

No. 117

Mining and other surface disturbing activities generally impact water quality and quantity both on the surface and subsurface. The degree of the impact depends on several factors such as location, type, and extent of the disturbance and the stream or aquifer being disturbed.

Federal regulations have set limits above which degradation of water quality and quantity cannot occur. The State of Montana regulations are even more stringent, not allowing degradation of water quality or quantity off the disturbance or mine site. BLM would develop mitigation measures to ensure the Montana regulations for water quality and quantity could be maintained prior to approval of a plan of operation.

The Montana Water Quality Act and the Metal Mine Reclamation Act require mine permittees to characterize (test) existing surface and ground water conditions before mining activity begins. The Water Quality Board and BLM determine the types and level of characterization based on the type, level and location of the mining activity.

For more information please refer to the Monitoring and Evaluation section of Chapter 2.

No. 118

The proposed alternative states that off-road vehicle use would be confined to designated road and trails all yearlong in the river corridor, regardless of the type of river segment classification. Those roads and trails would be identified in an off-road vehicle implementation plan that will follow the approval of the RMP.

Public Meeting Shelby, Montana July 15, 1987

Formal Statement

My name is Mickey Fulp. I am a geologist with Santa Fe Pacific Mining. We are located in Albuquerque, New Mexico. We are a subsidiary of the Santa Fe Southern Pacific Corporation which you may know better as the Santa Fe and Southern Pacific Railroads.

Since 1984 I have served as Project Manager for Santa Fe on our Sweet Grass Hills exploration joint venture with Lehmann and Associates out of Minneapolis, Minnesota. Since I am a geologist I will restrict my comments tonight to mineral resources of the Sweet Grass Hills area and the benefits of developing them.

Santa Fe will provide more detailed written comments to the BLM before the comment closing date. Our joint venture presently controls approximately 3600 acres of patented and unpatented mining claims, state leases and private leases in the Sweet Grass Hills. Our latest results have brought more focused attention to the Tootsie Creek area, East Butte. We have identified three areas with gold mineralization of tenorite to constitute ore. We are presently testing the continuity and size of these deposits.

The project is still in its initial exploration stage yet since the fall of 1984 Santa Fe Pacific Mining has spent over \$500,000.00 on the program. The economic benefits to Liberty and Toole counties has been substantial mainly through goods and services purchased by our exploration crews. In addition, we have employed a local contractor for most of our road construction and pay substantial rentals and advance royalties thru our private lessors.

The draft resources management plan environmental impact statement for the West Hill area is of deep concern to Santa Fe Pacific Mining. We do not believe the BLM's preferred alternative best serves the people of the region or the people of Montana. We feel the only viable alternative is alternative A which would continue with the present management program for the area. Current State and the BLM regulations provide stringent construction and reclamation stipulations on all exploration, excavating and development activities.

- 153
- 119 I find it somewhat amusing that one of the four reasons for the BLM's so called preferred alternative is the Sweet Grass Hills are an historic hardrock mining region.
- 120 The preferred alternative of the BLM would have a significant negative impact on the mining industry. We have already felt this negative impact in that our recent 1987 exploration proposal has been delayed pending appeal of our 1986 plan. The preferred alternative would complicate our process of permitting drastically.
- 121 We are also concerned with the lack of notification of mining claim holders of record in the planning process. The BLM maintains files in Billings documenting all valid mining claims in Montana, yet of the major claim holders in the area none that we know of, and this includes Santa Fe Pacific Mining, Lehmann and Associates, Utah International, American Copper and Nickle, and Archaeon Mining, were officially notified of the proposed plan.

No. 119

The reference to historic hardrock mining has been deleted as a reason for Area of Critical Environmental Concern designation. BLM did not mean to imply this was a reason for designation, but only meant to acknowledge that there has been historical as well as current mining use.

No. 120

BLM agrees that the proposed alternative will have a negative impact on the mining industry. However, BLM does not feel it will be a significant negative impact (long-term and lasting in effect). The Bureau feels the impacts of this alternative on the mining industry would be a moderate negative impact (short-term and temporary in effect). This is due to the requirements of filing a Plan of Operations, where a Notice previously sufficed, and waiting for formal approval of that plan. The BLM will be required to comply with the time frames (generally 30 days) outlined in 43 CFR 3809 for approving a Plan of Operations.

The delay experienced in your 1987 exploration program is a result of an appeal filed on the 1986 approval. This occurred under the current management practices (Alternative A). This appeal, and the subsequent delay of your 1987 exploration program would have occurred no matter which alternative was in place.

No. 121

Please refer to response No. 13.

No. 122

Please refer to response No. 9.

No. 123

Please refer to response No. 15.

122

We feel the draft is inadequate in addressing the geology and mineral resources of the Sweet Grass Hills. Geologically the Sweet Grass Hills are strikingly similar to major gold mining areas in central Montana. Some examples would be Zortman-Landusky in the Little Rocky Mountains, Kendall Mine in the Moccasin Mountains, and the Spotted Horse-Gilt Edge Mines in the Judith Mountains. In addition the Sweet Grass have striking geologic similarities to the most famous gold mining area in this country and that's Cripple Creek Colorado. Numerous gold and silver occurrences are known in the Sweet Grass Hills and occur on west, middle, east and grassy buttes. Only a few of these were documented in the draft EIS. The following known occurrences were not even mentioned. At West Butte there were patented mining claims. At Grassy Butte is the site of present exploration drilling. An active gold placer mining operation has been ongoing in the Middle Butte area for several years. None of these occurrences were documented in the draft EIS. The report does not address at all recent exploration activities, potential for hosting major mineral deposits, and the benefits of mineral development to local economies. Santa Fe Pacific Mining feels a likelihood of finding mineable gold deposits in the Sweet Grass Hills both of the underground or surface mining character extremely high, with mock resource potential exceeding one million ounces of gold. At present prices that one million ounces of gold would be worth \$450,000,000.00.

123

The report is inadequate in that no data is presented on the economic benefits of exploration to local communities and future benefits should development occur. I have already briefly mentioned Santa Fe's exploration activities and direct benefits to the towns of Shelby and Chester for the last 3 years. Before any development could occur an additional 2 to 5 million dollars would be spent on exploration. I found it interesting to note that the BLM administers approximately 625,000 acres within the West HiLine study area within an area total of 11,285,000 acres of land. Compare this with the average surface gold mine mill complex which occupies less than 100 acres.

Now I would like to give you some facts and figures on gold mining. We're going to take this average size hypothetical surface gold mine. It will occupy less than 100 acres, it's development costs will range from 10 to 20 million dollars. It will employ 75 to 100 people, mostly hired from a local labor force. This would include people all the way from electricians to secretaries. It will have an annual payroll of 1.5 to 2.5 million dollars, and it would provide numerous indirect jobs. Some economic planners say 3 to 4 indirect jobs for every person employed in the mine to supply goods and services in the towns in which these people live. And it would substantially increase the state and local tax base. I think you can see from this that such a mineral development would have a strong positive affect on the economy of the local towns.

In summary, Santa Fe Pacific Mining supports Alternative A which would continue present management policies in the Sweet Grass Hills. We feel that present state and federal regulations adequately protect the areas with stringent construction and reclamation stipulations. The BLM's preferred alternative would have a significant negative impact on the mining industry.

In addition the draft EIS has not adequately addressed the high mineral resource potential of the area both surface and underground mines and the economic benefit of the exploration and development to local and state economies.

I thank you for listening and if you have concerns over the economy of the West HiLine area I ask that you consider our position in hopes that you lend your support. Thank you.

Public Meeting Shelby, Montana July 15, 1987

- 124 1) Under Alternative D will mineral exploration become more complicated? Will mining activity be more stringently controlled and will reclamation activities be more complex? Will mining activity require an EIS?

- 155 125 2) Under Alternative A what are the requirements if mineral activity is less than five acres? Do you have to file a notice of intent and does the BLM complete an environmental analysis?

- 126 3) For the practice of traditional religion under the American Indian Religious Freedom Act, do Native Americans have to identify and verify specific religious sites?

- 127 4) The map for the West HiLine Resource Management Plan, pertaining to the Sweet Grass Hills, has a lavender colored area. Does this area represent the ACEC acreage of 6950 acres or the management zone acreage of 17,500 acres from Table 2.5 page 34? Is there any provision in the EIS that would lend itself to an expansion of the management zones to Federally managed subsurface? Is the RMP meant to manage those explicit areas pertaining to the Sweet Grass Hills?

No. 124

The proposed alternative would designate the Sweet Grass Hills as an Area of Critical Environmental Concern. In this Area of Critical Environmental Concern a proponent would be required to submit a Plan of Operation and receive formal BLM approval before conducting activities on BLM-administered lands, regardless of the acreage to be disturbed. Special stipulations may be applied on a case-by-case basis. The additional time frames and review under the proposed alternative may allow impacts from specific proposals to be more accurately assessed and mitigating measures developed before problems occur.

In the portions of the planning area not designated an Area of Critical Environmental Concern, an operator may proceed 15 days after notifying the BLM of his intentions for projects less than 5 acres under the current management alternative. Mining and reclamation standards will remain the same, namely whatever is necessary to prevent unnecessary and undue degradation.

All Plans of Operation are evaluated under the National Environmental Protection Act to assess the impacts and identify the stipulations needed to prevent unnecessary and undue degradation. An environmental analysis is used to evaluate most actions; however, an environmental impact statement is required where significant impacts or a high level of controversy are expected.

No. 125

Locatable mineral activities (excluding casual use) disturbing less than 5 acres require the filing of a Notice with the BLM District Office under the current management alternative. This Notice must detail how and where activities would be conducted and must be filed at least 15 days before surface disturbing activities begin.

The BLM screens this Notice for potential conflicts with threatened and endangered species, cultural, watershed, soils etc. There is no formal approval or disapproval and no federal action taken, nor is there a formal environmental analysis prepared. However, if a Notice reveals that the activities to take place would cause unnecessary and undue degradation, steps are taken to correct the operation or stop the project.

No. 126

American Indians do not have to "identify and verify" specific religious sites to practice their traditional religion under the American Indian Religious Freedom Act.

Please refer to the Implementation of Traditional Cultural Values portion of Management Common in Chapter 2 for additional information.

No. 127

The lavender colored area on Map 3 has been revised to represent the Area of Critical Environmental Concern boundary. The use of management zones is no longer proposed in the RMP. The proposed alternative could apply special stipulations to mitigate impacts to raptors within the raptor habitat area delineated on the maps in Appendix 2.2.

Management guidance for the Sweet Grass Hills is located under the Emphasis Area discussions in Chapter 2. Additional guidance can be found under each resource in the Management Common to All Alternatives section of Chapter 2.

- 128 5) What is going to happen to those lands that have been identified for disposal? Will a lease on those lands continue to its expiration and will there be a renewal offered? How would a sale of public land be accomplished? Will the permittee of a grazing lease be reimbursed for improvements if the lands are exchanged or sold?
- 129 6) Would the ACEC management zone, on private surface and federal subsurface, constitute a zoning which would restrict private surface rights and entitle owners to just compensation?
- 130 7) What are the BLMs responsibilities when mining activity occurs on private surface and federal subsurface? What happens if a peregrine falcon or red tailed hawk nest is located in the area?
- 131 8) What are the BLMs responsibilities if somebody wants to drill an oil and gas well and you find a hawk or an eagle nest?
- 132 9) What areas can Native Americans claim for traditional religious practices?
- 133 10) Has the BLM done any studies of the relative cost of managing by Alternative A versus Alternative D, and what would those comparative costs be? Where is the increase in funding going to come from to manage the preferred alternative which is more management intensive? How will this affect mine permits if you don't have the personnel required to do the necessary clearances?

No. 128

Public lands identified for disposal would be managed under the guidance of the RMP until disposed of. Current authorizations and renewals will continue until disposal occurs. After disposal, BLM no longer has any management involvement.

Sales of public lands can occur through a competitive, modified competitive, and direct sale process. All types of sales are listed in local newspapers and the Federal Register. The sale and grazing regulations do allow for the grazing lessee to be reimbursed for improvements.

No. 129

The management zone concept has been eliminated. Please refer to response No. 32.

No. 130

The BLM has no regulations or permitting requirements for hardrock mineral activity occurring on private surface. Such activity is regulated by the Montana Department of State Lands.

No. 131

Raptor protection measures for sensitive or threatened and endangered species, contained in the standard oil and gas lease stipulations (Appendix 2.2), limit surface occupancy to no closer than 1/4-mile from an occupied nest. The proposed alternative would implement the Rocky Mountain Front Raptor Guidelines in the Sweet Grass Hills and Kevin Rim Areas of Critical Environmental Concern (Appendix 2.2). In most circumstances an operator, would have two options: (1) they could relocate the well; or (2) they could wait until the nesting raptors leave before beginning surface disturbing activity at a closer proximity than the 1/4-mile limit.

BLM's responsibility is to ensure that the oil and gas lessee is provided the opportunity to develop the lease while also ensuring that raptors and their habitat are not compromised in the process.

No. 132

Please refer to response No. 126.

No. 133

An analysis of each alternative was completed based on the management intensity by planning issue. The current funding level would be adequate to implement the No Action Alternative. Alternative B would require a 3 to 5% increase and Alternatives C and the proposed alternative would require 5 to 10% increases.

Funding levels would affect the time and implementation of management actions over a period of 10 to 15 years, but would not affect resource allocations made under this RMP.

- 134 11) What brought on the new management plan and the need for it? Why the need for all the changes when Alternative A seemed to work quite well?
- 135 12) I have not seen designated trails on 98% percent of the BLM land. What is the interpretation of an allowable trail for off road vehicle use?
- 136 13) Page 87 deals with 529.67 acres that would be opened up to mineral entry in East Butte. Is this located on a map and where is it designated in the RMP?
- 137 14) When the BLM exchanges or sells public land, what happens with the mineral rights?
- 138 15) Is a mining company required to reclaim an area under Alternative A?
- 139 16) Are the professionals settling for something that is less than adequate under the preferred alternative?

No. 133 cont.

The annual BLM budget process would set funding and workload priorities. If BLM staff are not available to do the clearances, other options including: assistance from other agencies, private contracting, or requesting the company to supply the information may resolve the budget/staff deficits.

For additional information and text revisions please refer to the Budget Assumptions section in Chapter 2.

No. 134

Existing planning documents were found to be outdated and no longer useful. The West HiLine RMP/EIS was developed, incorporating valid guidance from previous plans when possible, to address current issues and concerns.

No. 135

The Lewistown District currently does not have any trails designated solely for off-road vehicle use. Off-road vehicles may use any area or trail not designated as limited or closed. Use in limited areas is subject to the restrictions applied.

A trail with use restrictions would be posted with applicable stipulations.

Please refer to Chapter 2 of this document for designations under each alternative.

No. 136

The area involving the lands withdrawn to the Bureau of Reclamation in East Butte is shown on page 63, of the draft RMP. This management action is identified in Chapter 2 under the Emphasis Area discussion for each alternative.

No. 137

Please refer to response No. 100.

No. 138

Reclamation is required for hardrock minerals activity under all alternatives. Reclamation is governed by 43 Code of Federal Regulations (CFR) 3809.

No. 139

The BLM feels that the proposed alternative presents an overall balance for managing the public lands under BLM's multiple use mandate, which precludes the selection of an alternative strongly favoring one resource over another.

- 140 17) Who made the decision that the preferred alternative is Alternative D? How was this decision made? Is Alternative D the final plan with some necessary alterations based on public input? Who makes the decision on the final plan and has that decision already been made?

- 141 18) What happens if the public prefers Alternative A? Is public input only from within the state or from all over the country?

- 142 19) How was the public notified about the draft RMP? How come mining claim holders were not notified?

No. 140

BLM managers reviewed the analysis of the alternatives for: 1) effectiveness in resolving planning issues; 2) conformance with the guidance established by the planning criteria; and 3) avoidance of unnecessary impacts to the human environment.

Based on the above criteria, the preferred alternative (Alternative D) was presented to the public as a balanced management strategy for public lands and resources. The preferred alternative has been modified to reflect the public review process. Public comments and an evaluation of the alternatives against the criteria listed above led BLM to select the proposed alternative in the final RMP.

The BLM will issue a Record of Decision identifying the final plan following distribution of the proposed final RMP and allowing for a protest period. If a protest is received, the BLM can issue an ROD for that portion of the plan not under protest, pending a decision on the protest, or defer the ROD until after resolution of the protest. The Montana State BLM Director authorizes the final plan.

Additional information on this subject can be found in the Selection of the Proposed Alternative section of Chapter 2.

No. 141

BLM has considered public participation and opinion in all issues and has modified its preferred alternative.

Public opinion is solicited and considered from all interested U.S. citizens, organizations and agencies.

No. 142

Please refer to response No. 13.

Public Meeting Chester, Montana July 16, 1987

Formal Statement

My name is Fred Jenkins, I am exploration manager for Santa Fe Pacific Mining and I represent our company on the statement I wish to make here this evening. We have been working here in the Sweet Grass Hills particularly focused lately on the East Butte area since about 1984. As of the end of this next week we will have spent close to a half million dollars in an effort to locate an economic gold deposit.

We come with some credentials I think from an environmental standpoint. I need to bring this up briefly because what we feel is unfair in the Alternative D is the designation of the area of critical environmental concern. We ourselves have been, I think, very thorough in our handling of environmental matters, and as a matter of fact, we have received endorsements from the New Mexico Wilderness Coalition testifying to congressional committees on our behalf in the way we have operated in the past as well as the National Parks Conservation Association. This has to do with work we have done on WSA areas and other work we have done in the southwest.

So our main concern is with the policy under Alternative D of identifying the area of critical environmental concern. We don't believe that is justified in giving the fact there is no known proven habitat that's going to involve an endangered species nor is there a problem with nesting birds. There is only a future proposed program upon which we have no solid backing. We feel that the work we have done has shown solid evidence and supports the already admitted statement of the BLM that there is good mineral resource potential there, and especially in our case in gold.

We have focused in as I said, in the East Butte area and we recognize the conflicts that are there, but we believe that the current management technique, the multiple use concept in Alternative A would best suit the problem of addressing that. We see no advantage in Alternative D except that the ACEC would further make it more difficult to operate a mining venture. Yet, it would only slow things down and cause more expense, in the bottom line it is going to be all of us that pays for that.

So our basic statement is that we feel that the State and Federal regulations would adequately protect the areas as they've been defined and we support Alternative A in that respect.

Public Meeting Chester, Montana July 16, 1987

- 143 1) What is the difference in reclamation between Alternatives A and D, for example in mining? What about getting a permit to do disturbance, would it be the same between Alternatives A and D?
- 144 2) Is the whole area (West HiLine) going to be designated under the same Alternative?
- 145 3) Is there a large open pit mining operation foreseen for the Sweetgrass Hills? Could it reduce big game habitat?
- 146 4) Where is the 529 acres of withdrawl land that you want to open to mining? Isn't it inconsistent to open this area up to mining and designate the area an ACEC?
- 147 5) Did BLM permit and approve the mining road into Devil's Chimney in the Sweet Grass Hills? Will the road be reclaimed? Do you control access on roads open to mining or can the public drive on that road? Can you control access for the purpose of protecting wildlife habitat?

No. 143

The reclamation standards are intended to prevent unnecessary and undue degradation of federal lands and resources. This standard applies under all alternatives. Disturbance has to reach a 5-acre threshold before a formal permit is required under Alternative A.

An approved Plan of Operation is required for all surface disturbing activity within designated Areas of Critical Environmental Concern (Kevin Rim, Sweet Grass Hills and Cow Creek), except casual use under the proposed alternative.

Each alternative would apply the unnecessary and undue degradation requirement to every plan of operation filed.

No. 144

BLM's proposed alternative, including the Management Common to All Alternatives guidance, would be implemented throughout the planning area.

No. 145

BLM has no mining Plans of Operation authorized, or pending, for a large open pit mine in the Sweet Grass Hills. If one was proposed, the environmental analysis would address potential impacts to big game habitat. Reduction in big game habitat would depend on the magnitude and duration of such an operation and the mitigating measures which would be applied.

No. 146

The location of the withdrawal is shown on Figure 3.6 (on page 63 of the draft).

The purpose of the Area of Critical Environmental Concern designation in the proposed alternative is not to preclude mining from the area. The BLM would continue multiple use management in the Area of Critical Environmental Concern with a management emphasis on protecting the resources for which the area was designated.

BLM's review of the withdrawal has indicated that 529.67 acres is no longer needed by the Bureau of Reclamation for the stated purpose. Therefore, BLM has recommended revocation of the withdrawal. The revocation would reopen the lands to the public land laws, including mineral entry. Since the majority of the Area of Critical Environmental Concern would remain open to the mineral entry, it is consistent to reopen these lands. The location of the withdrawal is shown on Figure 3.6 on page 63 of the draft.

No. 147

BLM did permit exploration work in the vicinity of Devil's Chimney on June 23, 1986. One of the conditions of approval was that the roads and drill sites be reclaimed when work is completed. A reclamation bond is being held by the Montana Department of State Lands.

Roads constructed on public lands are generally open to the public, while they are in existence; unless this use puts public health and safety at risk, or substantially interferes with the purpose for which the road was constructed.

Mitigation restricting access can be developed to protect wildlife habitat or other resources if the environmental analysis indicates these measures are necessary.

148 6) Are the 529 acres of withdrawal land part of the area already open to mineral exploration?

149 7) What are your standards for reclamation on a road like the one into Devil's Chimney?

150 8) How much in royalties are received from locatable mining? What will the private surface owner receive in an area with federal minerals and a mining operation?

151 9) Does BLM require an environmental assessment on mining projects? Is there public input into an environmental assessment?

152 10) What is the acreage of federal surface with federal subsurface for East Butte of the Sweet Grass Hills?

153 11) What protection will Alternative D provide ranchers with private surface over federal subsurface acreage in the event of a mining operation?

No. 148

The 529.67 acres are part of the 569.67 acres currently withdrawn by the Bureau of Reclamation which are not open to mining. Removal of the withdrawal would open that portion to mineral entry, unless those lands were subsequently withdrawn. This withdrawal is within an area that is open to mineral exploration. A review of the current withdrawal recommended that all but 40 acres be returned to public land status and opened to mineral exploration.

The map on page 63 of the draft RMP/EIS shows the general location of this area. For additional information please refer to response No. 136 and No. 146.

No. 149

The standards for road reclamation are to: replace the sidecast rock and soil, regrade the road to approximate the original contour, and reseed with an approved seed mixture at the prescribed rate.

The bond is not released until a self-sustaining stand of vegetation has been established and the stability of the reclaimed roadbed is to BLM's satisfaction.

No. 150

There are no federal royalties on locatable mineral production. In Montana, there is a State Metaliferous Mines Tax with a variable tax rate ranging from 0 to 1.5% of the gross produced value.

The private surface owner is entitled to compensation for damage to his surface and improvements, but no royalties or comparable income.

For more information please refer to response No. 130.

No. 151

All Plans of Operation permitted by the BLM must meet National Environmental Policy Act of 1969 (NEPA) requirements, which include that each action be analyzed and an environmental document be prepared, filed, and be available to the public. This process may involve public participation which is determined by the significance of impacts and level of controversy expected as a result of the proposed action.

No. 152

There are 4,760 federal surface acres and 13,305 federal subsurface acres in the East Butte area.

No. 153

The alternatives do not affect private surface. For additional information please refer to response No. 130.

154 12) Is Alternative D going to give you more control over mining in the ACEC areas versus Alternative A or does the 1872 mining law oversee mineral development?

155 13) What are you doing to control access in the Sweet Grass Hills? How will this affect our plans to make this a walk in recreation area? How will BLM control the damage to public and private lands?

156 14) Can you keep ORVs off of existing or future mining roads?

157 15) What is considered a trail on BLM land for ORV use?

158 16) How much private and public surface is there in the Devil's Chimney area?

159 17) What type of fire protection do mining companies have to provide?

No. 154

The 1872 Mining Law applies to all alternatives. If impacts can be mitigated and do not cause unnecessary or undue degradation, the BLM must approve a mining Plan of Operation.

No. 155

The Sweet Grass Hills would be given a limited off-road vehicle designation in the proposed alternative, which would restrict use to designated roads and trails. The intent is to eliminate cross-country motorized travel with access only on existing routes. The activity plan will further define limitation with regards to time of year and type of vehicle restrictions.

Continued multiple use under the Area of Critical Environmental Concern designation would permit a varied public use, but most of it should be confined to designated roads-trails identified in an off-road vehicle plan and identified in the field by signs. Some public and private off-road vehicle trespass may occur.

The specific details of a walk-in recreation area would be addressed in the activity plan that would be prepared for the Area of Critical Environmental Concern.

No. 156

A temporary restriction or closure can be put into effect if use of an existing mining road is dangerous to the public. This would be assessed on an individual basis. Future mining activity and associated roads would be addressed during review of the mining permit and Plan of Operations.

Please refer to Response No. 147 for additional information.

No. 157

The BLM has no routes identified or built as trails for off-road vehicle users. The term roads and trails is used generically to cover all possible access routes. A biker could use a cow trail or go cross country if the area is designated as open. Travel would be restricted to access routes if an area is designated limited to existing roads and trails.

An off-road vehicle trail is a route that accommodates one or two wheeled motorized or mechanical vehicles.

No. 158

Devils Chimney is located on the East Butte. The BLM manages 4,760 acres on East Butte.

No. 159

The operator must comply with all applicable federal and state fire laws and regulations and shall take all reasonable measures to prevent and suppress fires in areas of operation.

Any fires they cause which require BLM suppression action, will be billed to the mining company to recover BLM's costs. This is for man-caused fires only.

- 160 18) What are the standards for water quality on and around mining activity?
Is there any testing before mining activity begins?

- 161 19) Has the decision already been made that Alternative D is what you are going to do?

- 162 20) Do you have the discretion to deny opening the 529 acres to mining?

- 163 21) Why doesn't the BLM outline policies for ORV use in the Sweet Grass Hills?

- 164 22) How much and what type of mining activity can occur in the Sweet Grass Hills? Can a mining company go back into the mountain and remove the hills? Can they level the hills and just replace it with grass?

No. 160

The Montana Department of State Lands is responsible for ensuring that mining activity does not degrade water quality, unless a waiver is granted, based on necessary economic or social development. A waiver may not be granted if present and future uses of the water would be adversely affected. A public hearing is required for a waiver.

Operators are required to document existing surface and ground water conditions prior to mining activity. BLM and the State Water Quality Board would determine the type and level of characterization. Testing may or may not be required, depending on the type, level and location of the mining activity.

No. 161

Please refer to response No. 140.

No. 162

The 529.67 acres are segregated from mineral entry as stipulated in the withdrawal of these lands to the Bureau of Reclamation. Removal of the withdrawal would reopen these lands to mineral entry, unless another withdrawal segregating mineral entry were initiated. The proposed plan would allow mineral entry after removal of the withdrawal.

No. 163

Off-road vehicle designations have been identified for each alternative in Chapter 2 (under issue No. 2, Off-Road Vehicle). The proposed alternative designates off-road vehicle use in the Sweet Grass Hills as limited to designated roads and trails. Additionally, seasonal restrictions to off-road vehicle use of designated roads and trails would apply in crucial wildlife areas. An activity plan would be prepared to address specific restrictions prior to implementation.

No. 164

There are no set restrictions on what method of mining an operator may employ. The type of mining, open pit or underground, depends on the grade and configuration of the ore body. The government assumes the operator knows best how to develop a mineral deposit and merely evaluates the proposal to identify unnecessary and undue degradation.

If environmental analysis of a specific proposal indicates it would cause unnecessary and undue degradation, the operation is not permitted. The operator may elect to change the mining method to reduce impacts to a level that does not cause unnecessary/undue degradation.

As for an operation that would go in and level the Sweet Grass Hills, we have no indications of any mineral deposit that would justify such measures. Given what is known about the mineral potential of the area such a scenario is extremely unlikely.

165 23) On page 32 Alternative D, what is proposed for the one square mile of intensive ORV use and where is it proposed for?

166 24) What is involved with obtaining a mining patent?

167 25) Can a mining company cross private property to get to a federal claim?

168 26) Under Alternative D, why did you specify Native Americans would be notified of mining activity in the Sweet Grass Hills and not other organizations? What tribes use the Sweet Grass Hills for religious purposes?

169 27) Is there much ORV use on BLM lands which don't have legal or physical access?

No. 165

The intensive off-road vehicle use area, identified in the proposed alternative, is an option which may be developed if sufficient interest is indicated. The intensive use area would be located in an area designated open to off-road vehicle use and in an area which meets the criteria outlined in Chapter 2. Identification of a specific location will not occur until BLM receives sufficient interest.

No. 166

A mining claimant may apply for patent after doing \$500 worth of development work on a claim. It is then examined to verify the discovery of a valuable mineral, as defined under the mining laws. If there are no contests, then a patent is issued.

No. 167

A claimant may not enter private surface/private minerals without permission from the landowner. In areas where the mineral estate is owned separately from the surface estate, the mineral owner has certain surface rights. Mineral rights generally include surface use for purposes of access, exploration, development, mining, ore dressing and transportation operations. However, the surface owner is entitled to compensation for damage these activities cause to the surface and improvements.

No. 168

Under the American Indian Religious Freedom Act, a federal agency is obligated to consult with local Native American groups when actions may affect an identified religious site or area. The Sweet Grass Hills have been formally identified as a Blackfeet and Chippewa Cree Indian traditional religious area. They are also known to have been used by the Gros Ventre, Stoney, Blood and other tribes for vision questing activities.

No. 169

During the fall there is some off-road vehicle use on such lands, but actual use numbers aren't known.

Public Meeting Lewistown, Montana July 20, 1987

Formal Statement

My name is Dick Knox, I am president of the Missouri Breaks Multiple Use Association, and I speak here tonight on behalf of that organization. Our association is composed primarily of farmers and ranchers from Blaine, Fergus, Chouteau and Phillips Counties, we are the people who will be most directly affected by this proposed management plan. We do have some concerns and I will try to address them specifically tonight. First let me say that we truly believe in what the name of our organization implies, we believe in true multiple use of these federal lands we are discussing tonight. These uses include not only grazing and mineral development they include hunting, fishing, floating and other outdoor pursuits too numerous to mention. Taken together this wide range of commercial and recreational activities comprise true multiple use of not only the Missouri Corridor, but all Federal lands in the study area. We're here tonight to discuss the management for the next 10-15 years, hopefully it will stay as close to multiple-use management as is now the case.

Our organization can support Alternative D with these qualifications of riparian habitat. We love the cottonwood groves too, and recognize they are not regenerating as they should for the enjoyment of future generations. We would point out that completely fencing groves will be disruptive to ranchers with grazing permits. Livestock need shade during hot weather and complete fencing would be very detrimental, also fencing large groves will disrupt cattle movement to water and concentrate them heavily in other areas, creating problems that do not now exist. We could not support such a policy. We recommend that if such a policy is instituted that it provide for:

1. leaving a portion of all groves unfenced, the portions of the groves could be rotated to provide for reestablishment of the entire grove.
2. large and particularly long areas of groves be segmented to provide for normal cattle movement to water.

Our next area of concern is right-of-way management.

We believe Alternative D to be unduly restrictive. We believe that the amount and scope of the restrictions is very detrimental the future of gas development in the area.

There are producing gas fields on both sides of the river at the present time and a lot of the management area is rated high, with very good prospects for finding more natural gas. The proposed plan (Alternative D) will surely stifle future gas development, this in an economic ally depressed area with a shrinking tax base. If these restrictions were necessary to preserve the Beauty of the Area, which we all love, then perhaps we could support them. They are not! The oil and gas people have demonstrated over the years that they can keep disruption to a bare minimum and very successfully rehabilitate disturbed areas.

Our organization participated heavily in the public input regarding the pipeline crossing below Stafford Ferry. There were many who said a crossing that magnitude was not possible without heavy environmental damage. The opposite has proven true, to a person floating the river the crossing is absolutely not noticeable and if you are on the banks only a small marker is visible. The heavy scarring that was supposed to occur is not present to any degree at all. In fact if you don't know where the line is you would not notice it at all, this is less than four years, at the end of 10 years all of the right-of-way will blend with its surroundings, a very small environmental price to pay for economic activity so vital to this area.

Existing management between the BLM or the gas industry is working well, it should not be made heavily restrictive as it is in alternative D.

Our organization supports the Right-of-Way management in Alternative B.

To sum up our position, we support Alternative D, but with changes we have outlined.

- 170 1) What is the management plan the draft West HiLine RMP proposed for the trail up Cow Creek with respect to riparian habitat? Does the draft propose fencing about 100 acres in the Cow Creek area?

- 171 2) What problems are people (recreational users) causing on the UMNWSR? How does the draft propose to solve those problems?

- 172 3) Is the no wake speed provision enforced on the UMNWSR during hunting season?

- 173 4) Does the draft propose a carry in - carry out type of litter management program or any other type of regulations regarding garbage? If you have a law enforcement person on the river would then enforce all the regulations?

- 174 5) How was Alternative D selected as the preferred alternative? Was it a staff decision? Can public input change portions of the proposed alternative in the draft?

- 175 6) How does the draft propose managing the mineral resources, especially hard rock minerals?

No. 170

An activity plan will be prepared for the Cow Creek area which will be managed with a strong emphasis on riparian management. The activity plan may identify riparian pasture or enclosure needs but no specific acreage has been identified. The primary emphasis will be on grazing-management practices to improve riparian community conditions.

For additional information please refer to the Cow Creek Implementation section of the Alternative D description in Chapter 2 of this document.

No. 171

The problems identified include trespass on private land, indiscriminate off-road vehicle use, sanitation problems and soil compaction at campsite locations. Trespass on private land is most prevalent on the stretch from Fort Benton to Coal Banks. Each alternative provides for acquisition of recreational land, whether it be through exchange or purchase. Indiscriminate off-road vehicle use is conflicting with the floater use along the corridor. The limited off-road vehicle designation which specifies that off-road vehicles must use only designated roads and trails should minimize this conflict. Sanitation is a problem around the more popular campsites. The proposed alternative states that sites be upgraded if sanitation becomes a health problem. Soil compaction, or bare ground, occurs at the more heavily used campsites and management would keep the character and rate of change due to human factors within acceptable levels.

No. 172

The no-wake speed is in effect during the primary recreation use season on the scenic and wild segments of the Upper Missouri National Wild and Scenic River, currently Memorial Day through the week after Labor Day. The no-wake speed provision is not applicable after Labor Day.

No. 173

A pack in/pack out policy would be implemented. BLM law enforcement personnel would enforce only BLM regulations. A cooperative agreement could be signed with another agency which would expand this authority.

No. 174

Please refer to response No. 140.

No. 175

Hardrock minerals will be managed under the 43 CFR 3809 regulations which are applicable where BLM is the surface managing agency. For additional information and text revisions please refer to the Mineral Resource Management section of the Management Common to All Alternatives description in Chapter 2.

176 7) What is the legal definition of the UMNWSR corridor boundaries?

No. 176

The Upper Missouri National Wild and Scenic River, as identified in this RMP, includes the legally defined corridor and adjacent public lands necessary to manage recreation use within the corridor. The Upper Missouri National Wild and Scenic River is legally defined as the area within the rims of the Missouri River, from Coal Banks Landing to five miles above the Kipp bridge; and the river and its bed between Fort Benton and Coal Banks Landing, and the lower portion within the Charles M. Russell National Wildlife Refuge.

177 8) Does the draft address trapping or hunting (throughout the study area or in Cow Creek)? How will the proposed ORV management affect trapping?

No. 177

The draft RMP provides for recreational opportunities such as hunting and trapping in generic terms. For additional information please refer to the Recreation Management section of the Management Common to All Alternatives description in Chapter 2.

Off-road vehicle use would be restricted to existing roads and trails and seasonal limitations in the Cow Creek area. Specific details will be addressed in an off-road vehicle implementation plan.

178 9) How do you currently access the Cow Creek area? Does the draft propose a change in that access?

No. 178

Current access to the Cow Creek area is by way of the old Cow Island Trail to the James Kipp homestead; the Cow Island Road to Spencer Ridge and the Harry Liddle property, floating the Missouri River to the James Kipp homestead, and by way of numerous, unmarked, foot trails.

The draft does not propose any change in the current access.

179 10) How does BLM define a road and a trail for access purposes?

No. 179

A BLM road would fit one of the following criteria:

1. A two-track established solely from passage of vehicles over a period of time;
2. A vehicle route which has been improved and maintained by mechanical means to ensure relatively regular and continuous use.
3. A route maintained periodically for access by four-wheeled vehicles larger than 40" width.

A trail is a route that accommodates one or two wheeled motorized or mechanical vehicles.

180 11) What has been learned from BLM riparian studies (on the north side of the UMNWSR)? Does the draft propose fencing the cottonwood stands in riparian areas?

No. 180

Three years ago, a 60 acre riparian enclosure was constructed on the north side of the Missouri River. There was to be 30 acres with no grazing and 30 acres grazed in late fall. The area was enclosed with an electric fence, but because of difficulty in maintenance, there has been some livestock use within the enclosure each year. Despite this, willow and cottonwood reproduction is evident within the enclosure. These riparian studies have shown that proper livestock grazing, other than continuous grazing during the hot summer season, is not harmful to riparian reproduction and establishment.

- 181 12) Does the Nez Perce trail go up the bottom of Cow Creek? Does the draft propose acquiring all the deeded ground in the bottom of Cow Creek? Can the BLM force someone to trade that kind of ground for an isolated parcel?

No. 180 cont.

The Upper Missouri National Wild and Scenic River Coordinated Activity Plan will list management techniques in more detail. Fencing may be used as a grazing management tool, but it is doubtful if individual cottonwood groves would be fenced separately, except for smaller areas used by recreationists for camping or other uses.

No. 181

A 16-mile segment of the Nez Perce National Historic Trail is located in the Cow Creek drainage. The proposed RMP provides the guidelines to acquire private land either through easement or fee title processes for recreational opportunities. The amount of acquisition would depend on several factors including opportunities and funding.

The USFS is currently writing a management plan for the entire Nez Perce Trail which is slated for completion by October, 1989. This activity plan, which will be available for public review, will provide specific guidelines for management of the Nez Perce National Historic Trail.

Public Meeting Fort Benton, Montana July 21, 1987

Formal Statement

My name is Ernest K. Lehmann. I live in Minneapolis, Minnesota. I am President of Ernest K. Lehmann and Associates of Montana, Inc. and I am testifying on behalf of the company. Ernest K. Lehmann Associates of Montana is part of a group of companies who offer consulting geological services for the mineral industry and engage in exploration in their own right. I am a professional geologist and past president of the American Institute of Professional Geologists. I am a registered geologist in several states, including California and Alaska.

I am going to confine my remarks to the Sweet Grass Hills and to the aspects of the proposed management plan that relate to mineral exploration and possible mineral development. I guess my comments are particularly important that we get the oral testimony since we haven't found my written testimony.

We are a major holder of claims, mining claims and mineral leases in the Sweet Grass Hills area. And we also hold state and private leases, surface and mineral leases.

To summarize what I'm going to say, is that we believe that in the Sweet Grass Hills the only viable alternative presented in the management plan is Alternative A, which is the no action alternative. And this is because really for three major reasons, we think that the planning process has been flawed. We think the plan is based on inadequate data as to the Sweet Grass Hills only, we make no comment as to the rest. And we do not believe that the data presented substantiate the preferred alternative.

As I say we are a major claim owner, we have 25 mining claims on East Butte of which are in the proposed emphasis area, we have 28 claims at Middle Butte which are just to the north, and we have 30 claims at West Butte which are just to the west of the proposed areas which are at least where BLM has surface. These are areas, some of these claims are areas where BLM has the minerals and private persons have the surface. We are also the record lessee of extensive privately and state owned lands in all three areas.

I want to note for the record that we have never received an official notice of the proposed plan. We heard about the plan only indirectly even though the BLM has a record of our mining claims and we then had to initiate our own efforts to obtain a copy of the draft proposal.

We don't think that the draft is adequate and based on adequate information. The areas in which I proposed to comment are the lack of discussion of recent mineral exploration activities in the area, the potential of the area for hosting economic mineral deposits, and the economic benefits and impacts of mineral development if it should occur in the area, and in fact the basic geologic information that's presented in the draft plan is incomplete and partially is actually incorrect.

No. 182

BLM's responses to your specific comments are given in the later portions of your statement.

No. 183

Please refer to response No. 13.

No. 184

Please refer to response No. 15.

I'm not going to comment here on the details of the geology that would consume the time that is best spent in other ways, but in my written presentation we do give you a thumb nail sketch of the geology.

I do want to talk about the mineral potential because I think the other people who are here from the public deserve that background. The historic mineral exploration in the Sweet Grass Hills has been going on since the turn of the century and is focused primarily on fluorite deposits on East Butte and some copper deposits on East Butte, placer gold in Middle Butte and a small lip silver occurrence which dates back to the early part of the century which is on West Butte and was mined in the early part of the century. Neither the placer gold nor the lead-silver occurrences are discussed in the draft plan even though active mining is going on at Middle Butte at the present time.

There is right now active mineral exploration at East, Middle and West Butte and as well at Grassy Butte which is not in the plan but is significant to note that that exploration is going on. Grassy Butte is just southeast of Middle Butte. And the reason for this exploration is that the Sweet Grass Hills has strong geologic similarities to very important gold producing and prospective gold producing areas. The closest analogy in terms of geology is with the Little Rocky Mountains where what is now the fourth largest gold producer in the U.S. is operating. That operation started in the early 80's, it's a very significant operation.

The other of these outlying hills that occur in north central Montana are also prospective. We are active in the Bear Paw Mountains, there are others who are exploring in the Judith's and the Moccasin's and of course, as I mentioned, the Little Rocky's. These areas have some geologic similarity to the famous district of Crippled Creek in Colorado which everybody has at least heard of, which was a very large gold producing area. They also have similarities geologically to some new discoveries being made in the south pacific and they have significant potential not only for medium to large scale open pit operations but also for higher grade underground deposits.

There is gold, there are gold occurrences in the Sweet Grass Hills. The placer at Middle Butte is of course the most obvious, but we are aware of the fact that a major company has drilled a number of holes at Grassy Butte and has encountered more grade mineralization. They have not yet determined the extent of that.

Our work to date also indicates significant, though not yet commercial, occurrences of gold and related metals and elements in rocks and soils at all three areas of East, West and Middle Buttes. The data presented by the BLM plan makes no presentation of the amount of exploration that has been done in the Sweet Grass Hills in recent years or does it discuss the direct and indirect present and future economic benefits to the area from hard mineral exploration and development.

We would estimate that since we began our exploration in the area in 1983 somewhere in excess of half a million dollars is already been spent by us and

others on that exploration. This has included geologic mapping, geochemical mapping, sampling, geophysical work, topographic surveys and related work. It's going to take a lot of drilling to delineate any targets or test any targets in the area. So there will be a large additional expenditure. A lot of that money that's spent remains in the area, it does not disappear mysteriously to somewhere else. There are rentals paid to landowners, royalties, advance royalties paid, we purchase goods and services such as meals and lodging, road building services, and so on.

You can reasonably expect that any, before any discovery is delineated to the point where a development decision could be made that it would cost from a million to five million dollars per target, and there may be a number of potential targets in the area. These expenditures alone have a significant impact on the communities in the area of Chester and Shelby. And none of that is covered in the report. A small or modest size I would say, mining operation, open pit mining operation, if one were discovered and developed, might employ 35 to 50 people for periods of 5, 10 or 20 years. And these would be people who are heavy equipment operators, technicians, administrative staff, and who are relatively well paid. So that you could look at a payroll from a single discovery of at least \$800,000.00 to a million and a half. Larger operations would have comparably large affect and employ people.

It's kind of a rule of thumb by planners and social scientists that in the mineral industry one direct job produces three or four indirect jobs in the area in terms of services of various kinds, ranging from garages and machine shops to school teachers and so on. So that any mineral development in that area would have a significant and marked impact on the economy of the Sweet Grass Hills, none of this is cited in the plan.

We believe that the data presented in the plan in large measure does not substantiate the choice of Alternative D. We feel that decisions made with respect to mineral projects are really too fold. The exploration itself has very little affect on the environment. It's a temporary affect, we are required by the State of Montana, whether it's on Federal or private surface, to file with them reclamation plans and reclaim the land to their satisfaction. We are bonded in relation to that, in fact I met with the state people on another project this morning.

185 If mineral development occurs it's impossible to pre-judge what the affect would be. We do not now know whether it's a large deposit or a small deposit that what we might find, or if it's going to be mined underground or open pit, and until we have gone thru the exploration stage, we cannot make the kinds of judgments that are required nor can the BLM or the state. Therefore we think that environmental impacts must be judged on a project by project and a site by site basis. We feel that the current regulatory process in Montana is adequate. We deal with it, we dealt with it for a number of years in the exploratory stage, we are prepared to deal with it on the operational stage, in fact I've started some discussions with the state on that.

No. 185

Please refer to response No. 19.

Issues of air and water quality are dealt with by the state process in what we feel is in a reasonable manner and also the state process as the BLM is well aware deals with cultural and other resources. It does that on a site specific and project specific basis.

186 We're particularly concerned about the effect of some of the things like the raptor guidelines and feel that the imposition of the raptor guidelines to the Sweet Grass Hills is not warranted for a number of reasons. One is, there are no known nesting areas in the area at the present time as the plan states, and secondly we don't think that for example a three mile buffer is required around possible peregrine falcon's nests when I have some two blocks from my office on top of a skyscraper in downtown Minneapolis. So that we don't think the raptor guidelines should be imposed, if they do have to be imposed at some time it should be in relation to a specific project.

187 We don't see anywhere in the plan that there are any threatened or endangered species and the plan can't be, the Alternative D, can't be justified on that basis.

188 Our investigations of the areas, and we are not archaeologists and we are not out there looking for cultural sites but in three years of mapping we have not identified or noted any archaeological or cultural sites and the plan does not identify any.

189 We think that the exploration process has essentially zero effect on hunting as far as the elk or deer population goes and we think again that you cannot judge what the affect of a mining operation is going to be until the mining operation occurs, and again the state rules provide for taking that into consideration.

190 The same can be said of the affect on visual resources, which again are zero in the exploration stage, and again are dependant on the specific mine plans in the event something is developed.

191 Lastly we don't feel that the proposed Alternative D will do anything to mitigate the current conflict between Native Americans and Santa Fe Mining who is operating with us on East Butte and can't see that imposition of new restrictions and reduction of the five acre rule will do anything to resolve that conflict. That conflict as I understand it will probably be resolved in the courts.

From all of these factors therefore we conclude that the only alternative that should be considered in so far as the Sweet Grass Hills are concerned is Alternative A which is the no change alternative. Thank you.

No. 186

Please refer to response No. 20.

No. 187

Please refer to response No. 23.

No. 188

Please refer to response No. 24.

No. 189

Please refer to response No. 25.

No. 190

Please refer to response No. 26.

No. 191

Please refer to response No. 27.

Public Meeting Fort Benton, Montana July 21, 1987

- 1) Can you adopt part of one alternative and part of another for the final RMP? If you adopt Alternative D for the Missouri River, do you have to adopt Alternative D for the Sweet Grass Hills?
- 2) What is the schedule for modifying and adopting the plan? What form does a protest have to take?
- 3) Does the BLM have any plan for treating the noxious weeds in the river areas?
- 4) What is Alternative B?
- 5) Would the second choice for BLM be Alternative C?

No. 192

We can adopt any part of any alternative which has been analyzed in the document. Our proposed alternative reflects modifications based on the public opinion we have received.

No. 193

This final RMP/EIS is the modification of the draft. If BLM does not receive a protest within 30 days of issuing this final, we can issue a decision on what constitutes the RMP. If we receive a protest, a decision on that portion under protest will not be issued until the protest is resolved. The protest procedures can be found in the Dear Reader letter.

No. 194

The BLM has plans to treat the noxious plants in the river areas. The management guidelines are discussed briefly under "Grazing Management Implementation (Vegetation Related)" in Chapter 2.

The programmatic environmental assessment on Containment/Eradication of Selected Noxious Plants, referenced in the draft document, is available for review in the Lewistown District Office and in the Great Falls and Havre Resource Area Offices. BLM will emphasize biological control methods on large infestations in riparian zones and in floodplains along rivers and streams. Chemical control methods may be used along roads, trails, railroads, and on small upland infestations to eradicate or contain selected noxious plants as funding, personnel, and local coordination permits.

No. 195

Alternative B is the maximizing production alternative in which only those stipulations required by law (i.e., threatened and endangered species) would be applied to development on the public lands.

No. 196

BLM's proposed alternative is Alternative D; a blend of the three other alternatives. A second choice alternative has not been identified.

ERRATA

This section contains the changes and additions made to Chapters 3 and 4 of the draft RMP/EIS.

Many of the revisions required changing only a word or figure within a sentence, however, the entire sentence has been reprinted for the reader's convenience.

The revisions are given in the order of their appearance in the draft RMP/EIS. The left hand column of the following section shows the location (by page, column, paragraph and if necessary, the sentence) of the change made to the draft RMP. The indented text then contains the changes or additions made in that location. It would be to the reader's convenience to read this section in conjunction with the draft document.

LOCATION OF CHANGE

SHOULD READ

Chapter III—Affected Environment

Page 43, Column 1, Paragraph 6

Groundwater of better quality and quantity is available from deeper aquifers such as those contained in the Madison Group of formations, but the costs associated with development make it prohibitive for use except for large commercial interests or municipalities.

Page 43, Column 2, Paragraphs 2 and 3

The planning area is underlain by sedimentary deposits which include sandstones, shales, limestones and dolomites. In places these rocks have been folded, faulted and intruded by igneous bodies. Several episodes of glaciation occurred across the region. The resulting geologic settings include glaciated flat-lying sediments in northcentral Montana, large scale overthrust faults along the Rocky Mountains, and isolated outcrops of igneous rock in the Sweet Grass Hills and Bear's Paw Mountains.

Three uplifts (the Sweet Grass Arch, the Bear's Paw Mountain Arch and the Sweet Grass Hills) are the prominent structural features. Portions of the Montana disturbed belt and the Rocky Mountain overthrust belt cross the western edge of the planning area (Ross, Andrews and Witkind, 1958). Large amounts of glacial till and outwash were deposited in the regions by the Illinoian and Wisconsin stages of glaciation (Perry, 1962).

Page 43, Column 2, Paragraph 6, Additional Sentence

Appendix 1.3 contains more detailed information on oil and gas history and the program's current and reasonably foreseeable direction.

Page 45, Column 1, Paragraph 2, Sentence 1

Oil and gas production figures are provided in the Social and Economic Conditions section (page 75, Table 3.20) of the draft document.

Page 45, Column 1, Paragraph 4

An estimated 850,000 tons of coal was mined from the Big Sandy and Milk River Coal Fields in Blaine County (Hubbard, Koch, and Biggs, 1966) between 1890 and 1960 for local use. No coal production is occurring at this time.

Page 45, Column 1, Paragraph 6

Overall, the coal in the planning area is similar in grade and British Thermal Unit content to the coal mined from the Powder River Basin in southeastern Montana and northeastern Wyoming. The exception is that the coal beds in the planning area are thinner and less continuous in lateral extent. Currently, these localized deposits are passed over in favor of the more strippable coal deposits in the Powder River Basin. Estimated coal resources, by county, are identified in Table 3.2.

Page 45, Column 2, Paragraphs 1, 2, 3, and 4

Locatables

Deposits of gold, silver, copper, lead, zinc and bentonite occur in the planning area. Metallic deposits are associated with the igneous intrusions which uplifted the Bear's Paw Mountains and the Sweet Grass Hills. Locatable bentonite deposits are associated with the thick Cretaceous shales in the planning area. Figure 3.10 (a new figure in this Errata section) is a regional map showing the number of unpatented mining claims per township.

The occurrences of locatable minerals in the Sweet Grass Hills and their development potential are discussed in the Emphasis Area section of this chapter.

There are 35 unpatented mining claims in Blaine County, north of the Fort Belknap Indian Reservation, believed to be located for the purpose of developing the bentonite resources in the Cretaceous Bearpaw Formation (see Figure 3.10 of this Errata section). Commercial bentonite has been produced from the Bearpaw shale in both Phillips and Valley Counties. However, both of these mines, and their associated processing plants, were closed down several years ago due to the downturn in the petroleum industry; a major bentonite user. While there is a high occurrence potential for bentonite on those claims underlain by the Bearpaw Formation, the development potential would have to be rated as low at this time.

There is a group of unpatented mining claims in the Bear's Paw Mountains of Blaine County, east of the Rocky Boy Indian Reservation (see Figure 3.10 of this Errata section). There is no BLM administered surface associated with these claims. Gold is probably the primary mineral of interest. An exploration program was conducted in 1986, and unconfirmed reports indicate that an ore deposit of unknown size and grade has been identified.

There are 32 unpatented mining claims in the Breaks region of Blaine County just north of the Missouri River. Some of the claims lie inside the management boundaries of the Upper Missouri National Wild and Scenic River Corridor and the Cow Creek Wilderness Study Area. These claims are located on, and around several small igneous intrusions called diatremes. The composition of these diatremes is similar to kimberlite, which hosts diamonds in South Africa and other diamond producing areas. Geologic conditions suggest that diamonds could possibly be present in these diatremes (Hearn, 1979), but to date there have been no reports of any diamond occurrence.

Salables

Most of the planning area was glaciated during the Pleistocene epoch. Continental glacial ice extended south to approximately the Missouri River. The Sweet Grass Hills; Bear's Paw Mountains and the Little Rocky Mountains remained unglaciated, rising above the surrounding ice sheet (Colton, Lemke and Lindvall, 1961). Extensive material deposits resulted from the glacial activity, and the more recent stream activity.

These deposits are sources of sand, gravel and fill material. The commercially developed sources are privately owned. The primary users of federally owned mineral material deposits are the Bureau of Reclamation, the State of Montana and area county governments.

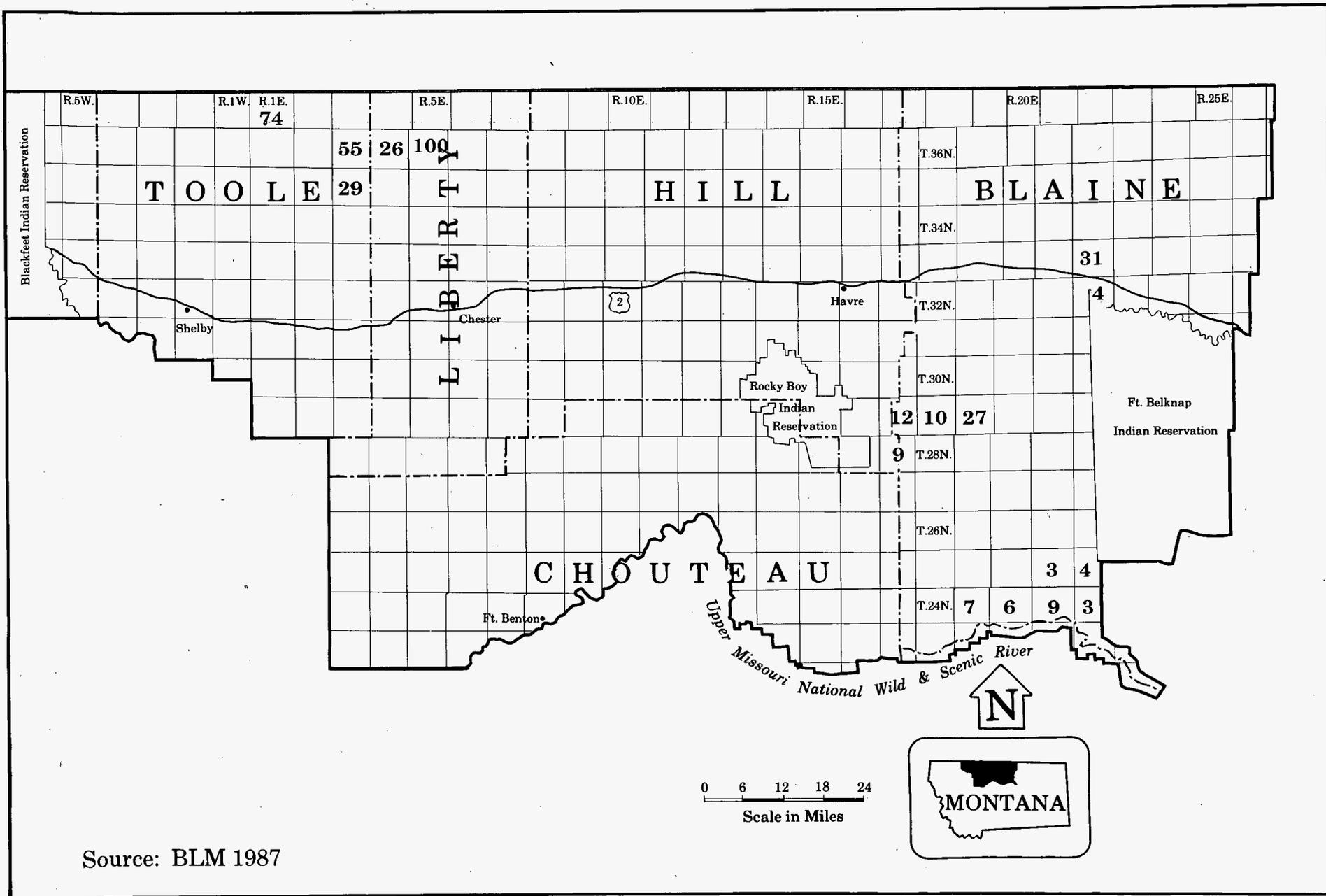
Page 46, Column 2, Paragraph 10

Riparian areas are those areas within wetlands; geographically delineated by distinctive resource values and characteristics. These values and characteristics result from the influence by permanent water. Availability of permanent water allows a greater diversity of plant, fish and wildlife species than surrounding ecosystems. Riparian zones vary in size and vegetative complexity because of the many combinations created between water resources and physical site characteristics (Hanson 1980). Site characteristics include topography, aspect, gradient, elevations, soil type; influenced by permanent water and water quality, and plant community. Riparian areas may be associated with lakes, reservoirs, estuaries, potholes, springs, bogs, wet meadows, and ephemeral, intermittent, or perennial streams.

Riparian areas are unique and among the more productive and important ecosystems. Healthy riparian systems filter and purify water as it moves through the riparian zone, reduce sediment loads, enhance soil stability, provide micro-climate moderation when contrasted to extremes in adjacent areas, and contribute to groundwater recharge and base flow (BLM Riparian Area Management Policy, 1987).

Appendix 2.4 lists the major riparian areas along the UMNWSR. The primary sources of surface water in the entire planning area are listed on page 43 of the draft.

Figure 3.10 Numbers of Unpatented Mining Claims per Township in the West
Hilina RMP Area.



Page 50, Column 1, Paragraph 3, Include As Last Sentence

For more information on candidate species management, please refer to the Wildlife & Fisheries Implementation portion of the Management Common to All Alternatives section of Chapter 2.

Page 50, Column 2, The Subheading Range

Grazing Management

Page 50, Column 2, Paragraph 6, Sentence 1

There are 397 grazing allotments in the planning area, of which 216 are administered under Section 3 of the Taylor Grazing Act and 181 under Section 15 of the Act.

Page 50, Column 2, Paragraph 6, Last Sentence

The Great Falls Resource Area directly administers 67 Section 15 allotments, while the Havre Resource Area administers the rest.

Page 50, Column 2, Paragraph 8, Sentence 1

Management categories have been assigned to each of the 397 grazing allotments.

Page 51, Column 1, Paragraph 1, Last Sentence

Objectives are prepared and a grazing system is developed to consider all resource needs within the allotment and on surrounding allotments.

Page 54, Column 2, Paragraph 3, Additional Information

The following is a list of species of special interest or concern in the West HiLine planning area.

MAMMALS

Dwarf Shrew
Preble Shrew
Merriam Shrew
Big-eared Bat
Hoary Marmot
Black-tailed Prairie Dog
Black-footed Ferret
Wolf
Lynx

AMPHIBIANS

Dakota Toad

FISH

Pallid Sturgeon
Paddlefish
Sicklefin Chub

BIRDS

Northern Goshawk
Ferruginous Hawk
Merlin
Peregrine Falcon
Prairie Falcon
Golden Eagle
Mountain Plover
Upland Sandpiper
Long-billed Curlew
Northern Pygmy Owl
Northern Saw-whet Owl
Long-eared Owl
Burrowing Owl
Pileated Woodpecker
Olive-sided Flycatcher
Western Bluebird
Clay-colored Sparrow
Brewer's Sparrow
Bobolink

Page 56, Column 1, Paragraph 5, Sentence 2

The entire 149 miles of the Upper Missouri National Wild & Scenic River flows through the planning area.

Page 56, Column 2, Paragraph 7, Last Sentence

Each of the BLM-administered wilderness study areas is described in detail in Appendix 2.8.

Page 58, Table 3.7, Right-of-Way Footnote

Rights-of-Way are issued for various utility and transportation purposes. Table 3.8 identifies rights-of-way by county.

Page 60, Column 1, Paragraph 3, Sentence 1

The Kevin Rim contains significant resources (exceptional raptor habitat and significant archaeological sites) which are unique to the planning area.

Page 60, Column 2, Paragraph 2, Sentence 3

Presently 54 wells have been drilled in the proposed emphasis area.

Page 61, Figure 3.5 Was Revised As Shown on the following page

Page 62, Column 1, Paragraph 2, Sentence 1

There are five rights-of-way within the Kevin Rim area (four roads, pipelines, etc. associated with oil-gas activity and one communication site).

Page 62, Column 1, Paragraph 10, Sentence 1

The Sweet Grass Hills emphasis area is unique because of its traditional religious importance to the Blackfeet, Chippewa-Cree, Gros Ventre, Blood and other Native American tribes; its habitat potential for reintroduction of the endangered peregrine falcon; and its important elk and deer habitat.

Page 62, Column 1, Paragraph 11, Delete Sentence 2

Page 62, Column 1, Paragraph 11, Sentences 4, 5, and 6

There are approximately 7,952 BLM-administered surface acres within the boundaries of these three Buttes (4,760 acres on East Butte, 600 acres on Middle Butte and 2,592 acres on West Butte). There are approximately 11,072 BLM-administered subsurface acres beneath the public surface on these three Buttes.

Page 62, Column 2, Delete Paragraph 4

Page 63, Figure 3.6 Was Revised As Shown on the following page.

Page 64, Column 1, Paragraphs 1-8

The Sweet Grass Hills are composed of three separate areas known as East Butte, Middle (or Gold) Butte and West Butte. The Sweet Grass Hills were formed in Eocene time (Truscott, 1976), approximately 50 million years ago, by the intrusion of igneous material into the overlying sedimentary rock as plugs, laccoliths, dikes and sills. These sedimentary rocks were domed upward in the three separate areas that make up the Sweet Grass Hills and dissected by erosion into landforms resembling three distinct groups of hills rather than three individual buttes.

All three buttes have lately been the focus of hardrock exploration activity, primarily for precious metals. Very little published data is available on the Sweet Grass Hills and only recently has information become available concerning their mineral potential.

The current mineral ownership in the Sweet Grass Hills varies considerably. The following are examples of mineral ownership patterns: federal surface/federal minerals, private surface/federal minerals, private surface/private minerals, and state surface/state minerals. All of the federally owned minerals are currently open to location and entry under the mining law, with the exception of those portions of T. 36 N., R. 5 E., Sections 29 and 30 (withdrawn by the Bureau of Reclamation.) This withdrawn area presently consists of 569.67 acres. Detailed maps and plats of the area are available from local BLM offices.

East Butte is the largest of the three buttes and is composed of large masses of syenite porphyry in contact with the limestones of the Madison Group. It also has the longest history of mineral exploration and production.

During World War II, East Butte was investigated as a possible fluorspar (CaF₂) source. The report concluded that better deposits existed that were not as remote (Ross, 1950).

Figure 3.5 Kevin Rim Emphasis Area

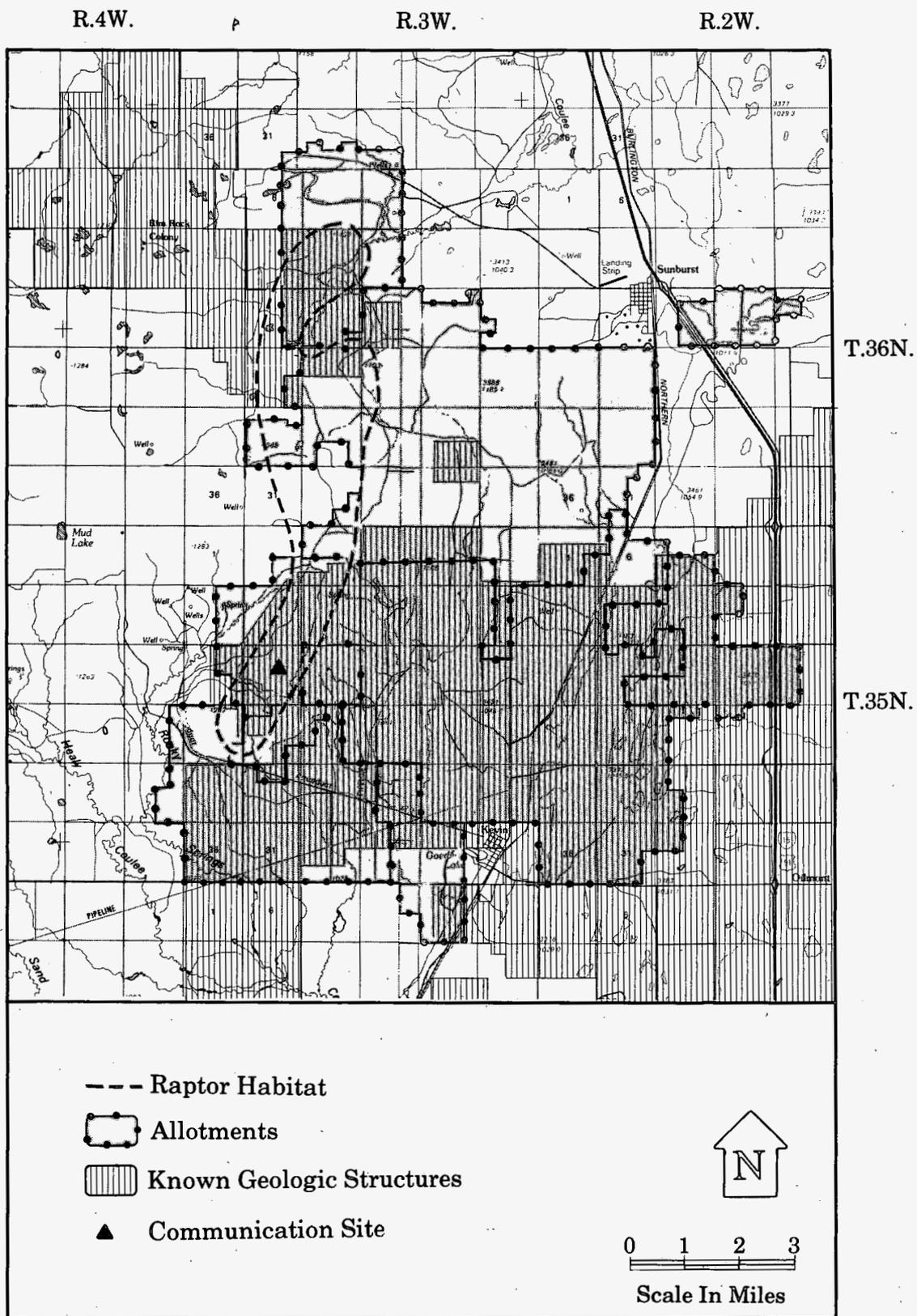
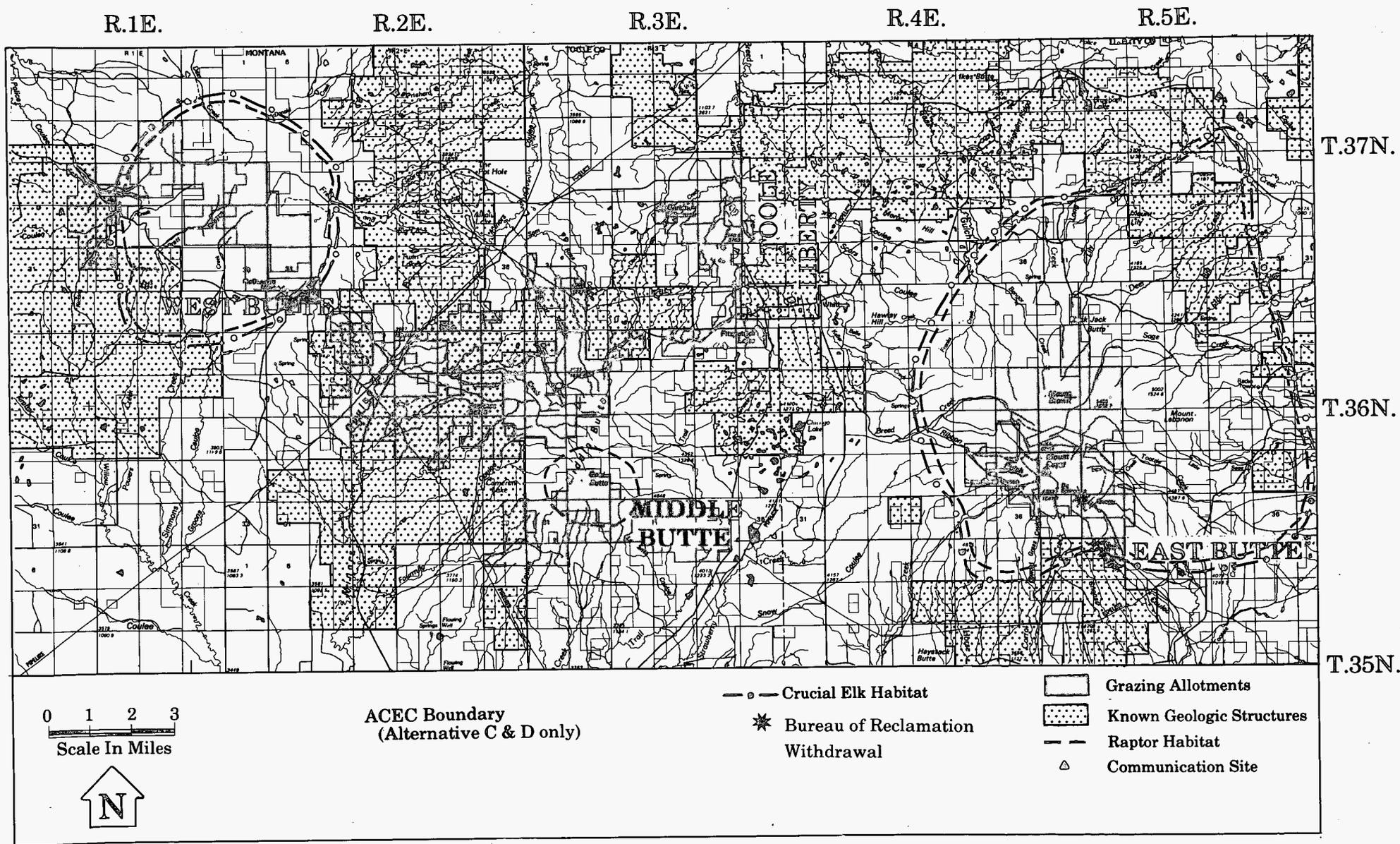


Figure 3.6 Sweet Grass Hills Emphasis Area

181



T.37N.
T.36N.
T.35N.

0 1 2 3
Scale In Miles



ACEC Boundary
(Alternative C & D only)

- Crucial Elk Habitat
- ★ Bureau of Reclamation Withdrawal
- ▭ Grazing Allotments
- ▨ Known Geologic Structures
- - - Raptor Habitat
- △ Communication Site

Placer gold prospecting was widespread on East Butte near the turn of the century. The principal areas of placer mining were on Tootsie Creek, with some work being done on Halfbreed, Sage and other creeks on the southern slopes of East Butte. The total production was estimated at less than 2,000 ounces. The distribution of the workings suggest that the placer gold of East Butte may have been derived in part from the fluorspar lodes occurring at the syenite-limestone contacts (Ross, 1950).

Iron deposits were located on several claims east of Mount Royal in Section 32, T. 36 N., R. 5 E. These claims were patented in 1896. Most of the iron occurs in or near blocks of Madison limestone contained within the syenite. Samples reportedly assayed at 60% iron, but no ore is believed to have been shipped (Ross, 1950).

The Brown Eyed Queen Mine, located a mile southwest of Mount Royal, produced several small amounts of rich copper ore at the turn of the century (Ross, 1950). Records show production from lode deposits at the Sweet Grass Mine, near the head of Ribbon Gulch, of about 8,700 pounds of copper, 8,400 pounds of lead, 1,100 pounds of zinc, and 651 ounces of silver. Development at the Sweet Grass Mine was in progress in the mid 1960s. A mineralized fracture zone about 4-feet wide was being worked. Grab samples of the ore assayed 4 to 8% copper, 25 to 50% lead, and 12 to 25 ounces per ton silver with a trace of gold. Two 50-ton shipments of high silica ore were made to the Anaconda Smelter (Hubbard, Koch and Biggs, 1966). It is not known for certain why this prospect was abandoned, though it was probably due to its remote locale, small size and a downturn in the copper market.

Current exploration efforts on East Butte are focused on identifying gold/silver mineralization. The area has been largely unexplored in modern time. Soil and rock chip sampling have identified areas of anomalous gold concentrations on East Butte; particularly in the Breed Creek and Tootsie Creek areas, and up the South Fork of Tootsie Creek toward Mount Royal. Exploration activity in the summer of 1987, revealed gold mineralization of two general types. Low grade, widespread gold mineralization occurring at shallow depths within the syenite; and areas of relatively richer grade, yet particularly erratic, gold mineralization within solution breccia zones of the Mission Canyon limestone, which developed at the syenite-limestone contact.

Data supplied by various mineral companies was used to assess the gold/silver development potential of East Butte with the criteria in Appendix 3.4 (a new Appendix shown in the back of this document). Large portions of East Butte have moderate development potential as depicted in Figure 3.11 of this Errata section. No high development potential areas were identified because while widespread gold anomalies were found, not enough exploration work has been done to identify an ore body. This may change as more work is done in the area. Several mineral companies believe there is an extremely favorable likelihood of finding mineable gold deposits.

Stone and riprap have been extracted from quarries in the East Butte intrusives. There is an inactive riprap quarry in Section 32, T. 36 N., R. 5 E. located on a patented mining claim. Rock from this quarry was used as riprap during the construction of Tiber Dam. The Bureau of Reclamation has placed a withdrawal on lands adjacent to this quarry to secure future sources of riprap, though it is doubtful that but a small fraction of this material is needed. The lands under this withdrawal have been nominated by industry as an area of critical mineral potential because of the strong likelihood for the occurrence of precious metal deposits.

Middle Butte, also known as Gold Butte, consists of several igneous masses, and many associated dikes and sills, that have been intruded into shales of the Cretaceous Colorado Group (Kemp and Billingsley, 1921).

Anomalous gold and silver concentrations occur in soil, stream sediment and rock-chip samples on the northern portion of the Middle Butte complex. These mineral deposits occur in faulted and brecciated zones within the igneous intrusives and altered Colorado shales. The criteria in Appendix 3.4 indicates this area has moderate development potential (see Figure 3.11 of this Errata section).

Stream sediment sampling and exploration work on the most prominent peak of the Middle Butte area, Gold Butte, does not indicate occurrences of locatable mineral deposits. BLM records do not show any mining claims located on Gold Butte itself.

The name Gold Butte is derived from the historic placer gold mining that took place on the northwest side of Middle Butte, near the head of Eclipse Gulch. Mining first started here at the turn of the century, with several periods of revival since (Ross, 1950). The latest placer mining effort involves reworking the old placer tailings and mining some select new ground. This is currently occurring on patented claims in the southeast quarter of Section 18, T. 36 N., R. 3 E. The area is rated as having high development potential for placer gold (Figure 3.11 of this Errata section).

R.1E.

R.2E.

R.3E.

R.4E.

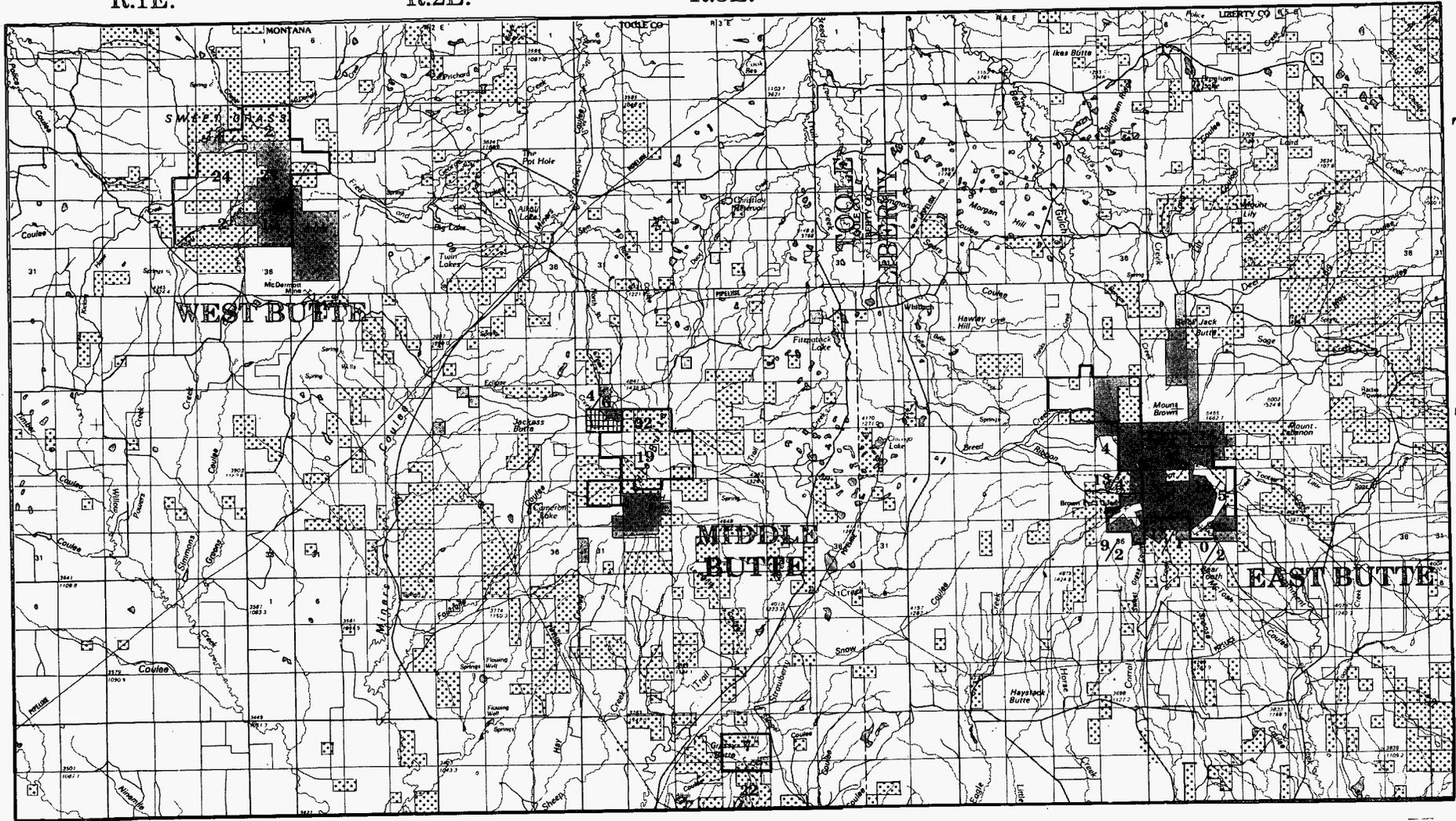
R.5E.

T.37N.

T.36N.

T.35N.

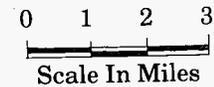
183



-  Federal Surface
-  Federal Subsurface
-  Area of Moderate Development Potential for precious metals (gold, silver)
-  Area of High Development Potential for precious metals (gold, silver)

23 Number of Unpatented Mining Claims in a Section

$\frac{2}{3}$ Unpatented / Patented Mining Claims



Source: BLM 1987

The Rest of the Area is Considered Low, No, or Unknown Development Potential

Figure 3.11 Sweet Grass Hills Hard Rock Mineral Potential.

West Butte is a large igneous mass with associated dikes and sills, intruded into Colorado shales. Small blocks of sedimentary rock from the underlying formations are contained within the intrusive body. There is a spectacular talus slope on the southeast corner that is probably due to erosion along a fault-line (Kemp and Billingsley, 1921).

Anomalous gold and silver concentrations occur in soil, stream sediment and rock-chip samples in an area generally northwest of West Butte peak. A little lead ore containing some gold and silver was produced in 1908, from patented claims in Section 14, T. 37 N., R. 1 E. These mineral deposits occur in brecciated zones within the intrusives and altered sedimentary formations and along fault contacts. Using the criteria in Appendix 3.4, this area is rated as having moderate development potential for gold and silver (see Figure 3.11 of this Errata section).

Just southeast of West Butte, on private land, a 2-foot thick coal seam in the Cretaceous Eagle formation has been altered by intrusives into what is locally described as a high grade semi-anthracite. This coal was occasionally mined for local use, probably as far back as 1890 (Kemp and Billingsley, 1921). There is currently no coal mining in the area.

Several miles south of Middle Butte, in T. 35 N., R. 3 E., Sections 22 and 27 is Grassy Butte. This feature is probably related to the same mechanisms that formed the three main buttes of the Sweet Grass Hills. It is a small volcanic breccia pipe that has intruded into the surrounding sediments.

There is no BLM managed surface on Grassy Butte, but there are 29 unpatented mining claims filed on federally owned minerals. In 1987, an exploration program for precious metals recovered over 3,000 feet of drill core from Grassy Butte. Though data is scarce, this area is believed to have moderate development potential (see Figure 3.11 of this Errata section).

Page 64, Column 1, Paragraph 9, Include As Last Sentence

To date, no intensive raptor surveys have been made in the Sweet Grass Hills. However, inventories are planned beginning in the spring of 1988.

Page 64, Column 2, Paragraph 1, Sentence 1

No peregrines are currently known to nest in the Sweet Grass Hills, but they do occur as migrants.

Page 65, Column 1, Insert Between Paragraphs 4 & 5

Since 1983, approximately \$500,000 has been spent on mineral exploration in the area, or an average of \$125,000 a year. Mining expenditures during exploration bring about employment and income in other sectors of the economy. These expenditures represent direct payments to wholesale and retail trade establishments, construction, transportation, and other services in the area. The local economy would benefit due to purchases made from businesses in the area. As these expenditures circulate through the local economy about \$110,000 in other business activity would occur along with the full time equivalent of three to four jobs and annual earnings of \$50,000. Most of this activity will occur for a short time period (two to three months) and the number of jobs affected would be about 12 to 16. This accounts for .4% of Liberty County's nonfarm employment and .5% of the nonfarm earnings. Mineral exploration offers some, but limited employment and income opportunities for the local economy.

Page 65, Column 1, Insert Between Paragraphs 7 & 8

Potential habitat exists for *Antennaris aromatica* and *Rorippa calycina*, candidate T&E plant species for listing, and several Montana species of "special concern." However, to date, no inventories have been made for these plants.

Page 65, Column 2, Paragraph 4, Last Sentence

Of the 464 miles, 16 miles are in the Cow Creek emphasis area; one of the few trail segments the public can enjoy almost exactly as it was in 1877.

Page 71, Table 3.14, Footnote No. 1

Actually Observed Visitors

**TABLE 3.15
RECREATION FACILITIES**

Facility Name	River Mile	Facilities Available	Permission Required		Ownership
			Public Land Access	for Access Across Private Property	
Fort Benton Visitor Center	1 N	Information, Interpretive Display	Yes		BLM
Fort Benton Boat Launch	1 N	BL	Yes		City
Evans Bend	6.5 S	DC, PT	No		BLM
Rowe Island	13.0 N	DC	No		BLM
Senieurs Reach	16.35	DC	No		BLM
Black Bluff Rapids	19.3 N	DC	Yes	Yes	BLM
Loma Ferry	21	BL		Yes	S
Wood Bottom	21.2 N		Yes	Yes	
Marias Island	22.5 N		Yes	Yes	
Spanish Islands	27.2 S	DC	No		P
Virgelle Ferry	39	BL	Yes		S
Coal Banks Landing	41.5 N	C, BL, W, PT, RS	Yes		S
Little Sandy Creek	46.7 N	DC, PT	Yes	Yes	BLM
Little Sandy Creek	47.4 N		Yes		
Lanning Ranch	51 N	L	Yes		P
White Rocks	53.1 N		Yes	Yes	
Eagle Creek	55.7 N	DC, PT	Yes	Yes	P
Hole-In-The Wall	62.8 S	C, S, PT	Yes	Yes	S
Dark Butte	69 N	DC, PT	No		BLM
Pablo Bottom	72.8 N	DC, PT	No		BLM
Stoos Ranch	75.3 N	L	Yes		P
Slaughter River	76.5 N	C, S, PT	Yes		S
Arrow Creek	77 S		Yes	Yes	P
Judith Landing	88.5 N	C, BL, PT, W, RS	Yes		S
Stafford Ferry	101.8 S	CT, W, BL	Yes		S
Gist Ranch	122.6 N		Yes		BLM
Cow Island Landing	125.5 N	DC, PT			S
Bull Creek	127 N		Yes	Yes	P
Woodhawk Bottom	130.6 S	DC, PT	Yes		BLM
	131.0 S				
Power Plant Bottom	132.3 N	L	Yes	Yes	P
Heller Bottom	136 S		Yes	Yes	P
Kendall Bottom	144 N		Yes		CMR
Knox Bottom	145.3 S		Yes		CMR
Le Clair Bottom	148.1 N		Yes		CMR
James Kipp State Park	149 S	C, PT, W, BL	Yes		S

Legend

River Mile	Facilities	Ownership
N — North	BL — Boat Landing	BLM
S — South	DC — Designated Campsite	S — State
	PT — Pit Toilet	P — Private
	C — Campground	CMR — C M Russell Wildlife Refuge
	W — Water	
	RS — Ranger Station	
	S — Adirondack Shelter	
	L — Private Launch Site	

Page 75, Column 2, Paragraph 1, Sentence 1

Oil and gas production is another basic industry of the area, providing 770 jobs in the oil and gas sector and an estimated 2,400 jobs in other sectors of the economy.

Page 76, Column 1, Paragraph 2 Additional Information At End of Paragraph

These indicators are simply an inference and are not meant to be a direct measurement of social well-being or all encompassing. People experience well-being as individuals and groups, while this assessment is attempting to determine the well-being of the study area as a whole. It should be pointed out that even if particular statistics show poor social well-being, the residents may not perceive their situation as such. Location and lifestyle may be more important to local residents than some other economic or social indicators of well-being.

Chapter IV—Environmental Consequences

Page 77, Column 1, Paragraph 1, Additional Information At End Of Paragraph

A Biological Assessment was prepared to determine the possible impacts to threatened or endangered wildlife species from implementation of the proposed alternative. The assessment found implementing the proposed plan would have no impact on threatened or endangered wildlife species. The U.S. Fish and Wildlife Service, agreed with that conclusion (see Appendix 4.2).

Page 78, Column 2, After Paragraph 2, Change Heading

Impact to Soils and Water

Page 78, Column 2, Paragraph 5, Additional Information at End Of Paragraph

Mining and other surface disturbing activities generally impact water quality and quantity both on the surface and subsurface. The degree of the impact depends on several factors such as location, type, and extent of the disturbance and the stream or aquifer being disturbed.

Locally significant impacts to soils and watersheds could occur at various sites along existing roads and trails as vehicles maneuver around rutted areas and potholes; widening existing roads and exposing more soils to potential erosion.

Federal regulations have set limits above which degradation of water quality and quantity cannot occur. The regulations for the State of Montana are even more stringent, not allowing degradation of water quality or quantity off the disturbance or mine site.

Page 79, Column 1, Paragraph 2, Delete Last Two Sentences

Page 79, Column 2, Paragraph 1

The land tenure adjustment program would have no physical impact on deposits of mineral resources. However, due to changes in land and mineral ownership patterns that may result from land adjustment, impacts to the mineral industry would be possible. The nature of the impact would be highly variable because of several factors such as: the land adjustment acreage, the mineral potential of the lands, the type of mineral commodity present, the creation or elimination of split estate acreage, and the environmental sensitivity of the lands involved. The exact nature and magnitude of impacts to mineral resource development would also depend on the specific proposal.

For locatable minerals, land adjustments which consolidate surface and minerals ownership and create larger blocks of public land simplify the permitting process, but may impose constraints on the operator in the form of operating limitations and added reclamation requirements.

For oil and gas development, land adjustments which increase federal ownership would tend to increase the cost of development for the oil and gas industry. Generally, it is more expensive to operate on federal than on private surface, regardless of mineral ownership due to additional constraints in the form of operating limitations and added reclamation requirements.

Consolidation of surface and minerals ownership simplifies, but does not necessarily shorten, the BLM permitting process. It allows greater control over the surface aspects of lease operation and again involves fewer parties in the approval process. If the BLM acquires federal minerals in areas managed under more stringent surface constraints (such as in wilderness study areas) it would increase the difficulty of mineral development, a locally negative impact on the mineral industry.

Page 79, Column 2, Additional Information Between Paragraphs 4 and 5

Impacts to Social and Economic Conditions

Mineral exploration would offer some, but limited, employment and income opportunities for the local economy. If exploration leads to mineral development, the local economy would benefit from long-term employment and income opportunities. Hardrock mineral development would benefit local communities. There also would be a trade off for that economic gain in the form of lost resource values such as wildlife habitat and watershed. The extent and significance of these employment and income opportunities cannot be determined without a proposed mining operation (i.e., level of activity, mine life, etc.). These impacts would be analyzed during the environmental assessment for a mineral development proposal.

Page 80, Column 1, Paragraph 1,

A total of 44,143 acres of public land could be disposed of.*

*This Change also applies to the following locations:

Page 80, Column 2, Paragraph 5
Page 82, Column 1, Paragraph 1
Page 83, Column 1, Paragraph 6
Page 84, Column 1, Paragraph 9
Page 85, Column 1, Paragraph 1, Lines 1, 2 and 3
Page 86, Column 1, Paragraph 5
Page 87, Column 1, Paragraph 3

Page 80, Column 1, Paragraph 5,

This alternative limits vehicular use to existing roads and trails on 148,335 acres of sedimentary breaks soils with slopes greater than 30%. Limiting ORV use would reduce the disturbance on these fragile and highly erodible soils; a locally significant, but moderate overall positive impact.

Page 80, Column 1, Paragraph 6, Sentence 2

Locally significant negative impacts would occur in this area due to ORVs disturbing the soil and causing accelerated erosion and loss of productivity.

Page 80, Column 2, Delete Paragraph 3

Page 81, Column 1, Add To End of Paragraph 2

This could be a locally significant impact.

Page 81, Column 1, Paragraph 3

This alternative limits vehicular use to existing roads and trails on 148,335 acres. Locally significant, but moderate overall positive impacts would result from limiting ORV use because of reduced disturbance on fragile and highly erodible soils and reduction of accelerated erosion.

Page 81, Column 1, Paragraph 4, Sentence 2

Locally significant negative impacts would occur due to accelerated erosion.

Page 81, Column 1, Paragraph 4, Delete Sentences 3 and 4

Page 81, Column 1, Delete Paragraph 8

Page 81, Column 2, Paragraph 3

A total of 44,143 acres of public land could be disposed of. Impacts would be minor.

Page 81, Column 2, Delete Paragraphs 4 and 5

Page 81, Column 2, Paragraph 9

At present, denying disturbance activities within 1/4-mile of active raptor nesting sites causes minor impacts to oil/gas exploration and development by requiring work to be delayed or routed differently.

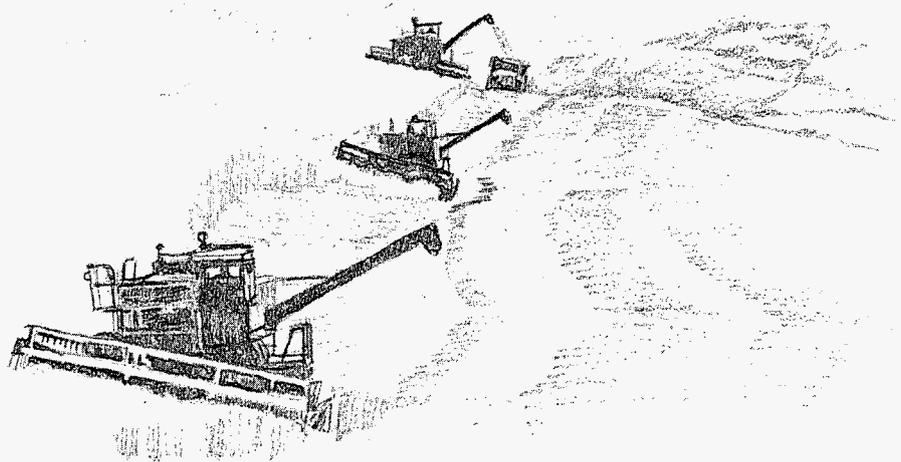


TABLE 4.1
CONSTRAINTS ON OIL & GAS EXPLORATION & DEVELOPMENT (ALTERNATIVE A)¹

Management Categories	High Development Potential	Acres	Moderate Development Potential	Acres	
1. Open Subject to Standard Terms and Conditions These are areas where standard terms and conditions are sufficient to protect other land uses or resource values.	Total subsurface acreage with high development potential minus acreage in categories 2 and 3 below.	368,768	Total subsurface acreage with moderate development potential minus acreage in categories 2 and 3 below.	298,147	
2. Open Subject to Seasonal or Other Minor Constraints These are areas where moderately restrictive lease stipulations (such as seasonal restrictions) may be required to mitigate impacts to other land uses or resource values.	* Kevin Rim * Sweet Grass Hills (East & West Buttes) area. * Crucial wildlife areas in the Havre Resource Area	249,445	* Crucial wildlife areas in the Havre Resource Area.	94,440	
3. Closed to Leasing These are areas where other land uses or resource values cannot be adequately protected even with the most restrictive lease stipulations. Appropriate protection can only be ensured by closing the lands to leasing.	* UMNWSR * WSAs	77,416	* UMNWSR * WSAs	33,251	
TOTAL HIGH		695,629	TOTAL MODERATE		425,838

¹BLM, 1987

Page 83, Column 1, Paragraph 8, Sentence 2

The habitat value of approximately 750 acres of crucial winter antelope range; 424 acres of crucial yearlong, and 2,640 acres of crucial spring sharptail grouse habitat; 1,900 acres of crucial spring/winter sage grouse habitat; 240 acres of crucial yearlong ring-necked pheasant habitat; 210 acres of crucial white-tailed deer habitat; 11,655 acres of high value, yearlong mule deer habitat; and one 39-acre wetland unit would decline if all 44,143 acres would be disposed of.

Page 83, Column 2, Paragraph 1, Delete Sentence 3

Page 83, Column 2, Paragraph 6, Additional Information At End Of Paragraph.

Raptor nesting sites would be disturbed during construction and maintenance of various lines, causing possible nest abandonment. Large transmission lines could also be hazardous to flying raptors. Impacts would be locally significant, but minor overall.

Page 84, Column 1, Paragraph 3, Sentence 1

Present hardrock and oil and gas activities are limited in the area so negative impacts to wildlife resources would be minor.

Page 85, Column 2, Paragraph 1, Sentence 5

Mining and other development in the area would seriously alter the solitude of the surrounding environs; making a religious experience difficult to obtain.

Page 87, Column 1, Paragraph 6, Sentence 6

Landownership transactions under Alternative A could result in the disposal of 44,143 acres of public lands.

Page 87, Column 2, Paragraph 2, Sentence 2

Denying surface disturbance within 1/4-mile of active threatened and endangered or sensitive raptor nest sites would present minimal restrictions for resource development and subsequently economic benefits.

Page 87, Column 2, Paragraph 3, Delete Sentences 3, 4, 5 and 6

Page 88, Column 1, Paragraph 1

A total of 50,117 acres of public land would be disposed of by sale and/or exchange in this alternative.*

*This change also applies to the following locations:

Page 88, Column 2, Paragraph 7

Page 89, Column 1, Paragraph 10

Page 90, Column 1, Paragraph 1

Page 91, Column 1, Paragraph 1

Page 92, Column 1, Paragraph 1

Page 93, Column 1, Paragraph 5

Page 94, Column 1, Paragraph 3

Page 88, Column 1, Paragraph 5

The locally significant, but moderate overall positive impacts would result from limiting ORV use in these sedimentary breaks soils because fragile and highly erodible soils would not be disturbed by ORVs and would not suffer accelerated erosion and loss of productivity.

Page 88, Column 1, Paragraph 6, Sentence 2

Locally significant negative impacts would occur in this area due to ORVs disturbing the soil and causing accelerated erosion and loss of productivity.

Page 88, Column 1, Paragraph 7, Sentence 1

The remainder of the planning area, 308,908 acres, would be open to ORV use.

Page 88, Column 2, Paragraph 12, Add To End Of Paragraph

This could be a locally significant impact.

Page 89, Column 1, Paragraph 1, Sentence 2

Locally significant, but moderate overall positive impacts would result from limiting ORV because of reduced disturbance on fragile and highly erodible soils and the reduction of accelerated erosion.

Page 89, Column 1, Paragraph 2, Sentence 2

Locally significant negative impacts would occur due to accelerated erosion.

Page 89, Column 2, Delete Paragraph 1

Page 89, Column 2, Paragraph 5

Denying surface disturbance within 1/4-mile of active threatened and endangered or sensitive raptor nesting sites could cause a minor impact to oil/gas exploration and development by requiring work to be delayed or routed differently.

**TABLE 4.2
CONSTRAINTS ON OIL & GAS EXPLORATION & DEVELOPMENT (ALTERNATIVE B)¹**

Management Categories	High Development Potential	Acres	Moderate Development Potential	Acres
1. Open Subject to Standard Terms and Conditions These are areas where standard terms and conditions are sufficient to protect other land uses or resource values.	Total subsurface acreage with high development potential minus acreage in categories 2 and 3 below.	368,268	Total subsurface acreage with moderate development potential minus acreage in categories 2 and 3 below.	298,147
2. Open Subject to Seasonal or Other Minor Constraints These are areas where moderately restrictive lease stipulations (such as seasonal restrictions) may be required to mitigate impacts to other land uses or resource values.	* Kevin Rim area * Sweet Grass Hills (East & West Buttes) area plus the 529 acre withdrawal revocation on East Butte *Crucial wildlife areas in the Havre Resource Area	249,974	*Crucial wildlife areas in the Havre Resource Area	94,440
3. Closed to Leasing These are areas where other land use or resource values cannot be adequately protected even with the most restrictive lease stipulations. Appropriate protection can only be ensured by closing the lands to leasing.	*UMNWSR *WSAs	77,387	*UMNWSR *WSAs	33,251
	TOTAL HIGH	695,629	TOTAL MODERATE	425,838

¹BLM, 1987

Page 90, Column 1, Paragraph 4, Sentence 1

Open ORV use on sedimentary soils of over 25% gradient would damage vegetation and indirectly increase soil erosion.

Page 90, Column 1, Paragraph 5, Sentence 1

Identification of an intensive ORV use area would completely eliminate vegetation on about 20 acres, which would be a locally significant negative impact.

Page 91, Column 1, Paragraph 4

Wildlife habitat on the 50,117 acres available for disposal includes: approximately 7,340 acres of crucial yearlong mule deer habitat; 405 acres of crucial antelope winter habitat; 200 acres of crucial ring-necked pheasant habitat; 1,210 acres of crucial spring sharp-tailed grouse; 730 acres of crucial winter/spring sage grouse habitat; and a 39 acre wetland tract.

Page 91, Column 1, Paragraph 5, Sentence 1

If the 50,117 acres are disposed of through sale, the 9,885 acres of crucial habitat described above would be lost; a moderate negative impact.

Page 91, Column 1, Paragraph 10, Additional Sentence

Right-of-way construction and maintenance activities would disturb nesting raptors; causing possible nest abandonment. Large transmission lines could also be hazardous to flying raptors. Impacts would be locally significant, but minor overall.

Page 91, Column 2, Paragraph 4, Sentence 1

Present hardrock and oil-gas activities are limited in the area so negative impacts to wildlife resources are minor.

Page 92, Column 1, Paragraph 2, Sentence 4

A total of 50,117 acres could be lost as trading stock for high value range resources.

Page 92, Column 1, Paragraph 3

ORV use on slopes over 25% gradient within watersheds would increase sedimentation in reservoirs below these areas and would damage livestock forage.

Page 92, Column 1, Paragraph 4, Sentence 1

About 20 acres of forage would be severely impacted under the projected use (about 2-4 AUMs); a locally significant negative impact.

Page 92, Column 2, Paragraph 1, Sentence 1

This alternative would result in the disposal of 50,117 acres of scattered tracts.

Page 93, Column 1, Paragraph 1, Sentence 5

Mining and other development in the area would seriously alter the solitude of the surrounding environs, making a religious experience difficult to obtain there.

Page 94, Column 2, Paragraph 1, Sentence 1

If exchanges were used as the only method of disposal, the exchange of 50,117 acres of public land for private and/or state lands would have a minor net fiscal impact on Payment In Lieu of Taxes, State Equalization Payments and annual county property tax revenues.

Page 94, Column 2, Paragraph 4, Last Sentence

These changes could have a minor impact to the local economy.

Page 94, Column 2, Paragraph 5

Denying disturbance activities within 1/4-mile of active threatened and endangered or sensitive raptor species nesting sites would present minimal restrictions for resource development and subsequently the associated economic benefits.

Page 95, Column 1, Paragraph 1

Grazing, oil/gas, mineral and other resource development would continue. Revoking the Bureau of Reclamation withdrawal on 529.67 acres and opening East Butte to mineral entry would offer more opportunities for mineral resource exploration and development. Economic impacts from mineral exploration and development are discussed under the Errata entry for page 79, column 2, paragraphs 4 and 5.

Page 95, Column 2, Paragraph 1, Sentence 1

This alternative provides for recreation developments by encouraging private sector initiatives in developing river management opportunities.

Page 96, Column 1, Paragraph 1,

A total of 15,689 acres of public land would be disposed of by sale and/or exchange in this alternative.*

*This change also applies to the following locations:

Page 96, Column 1, Paragraph 1

Page 96, Column 2, Paragraph 4, First Sentence

Page 97, Column 2, Paragraph 2

Page 99, Column 1, Paragraph 3

Page 99, Column 2, Paragraph 7

Page 100, Column 2, Paragraph 5

Page 102, Column 1, Paragraph 5

Page 96, Column 1, Delete Paragraph 5

Page 96, Column 1, Paragraph 6

This alternative limits vehicular use to existing roads and trails on 317,190 acres of sedimentary breaks soils. Locally significant, but moderate overall positive impacts would result from limiting ORV use on sedimentary breaks soils and riparian areas because the fragile and highly erodible soils would not be disturbed by ORVs and would not suffer accelerated erosion and loss of productivity.

Page 96, Column 1, Paragraph 7, Sentence 1

The remainder of the planning area, 197,299 acres, would be open to ORV use.

Page 96, Column 2, Paragraph 7

The impacts of ORV use are especially evident on sedimentary breaks type soils (soil subgroups 3, 4, 5, 16), soils with slopes greater than 25% (Appendix 2.5) and riparian areas. These areas, along with ACECs, WSAs, and important wildlife areas total 317,190 acres and would be restricted from ORV use. The locally significant, but moderate overall positive benefits would result from the lack of disturbance on fragile and highly erodible soils and reduction of accelerated erosion.

Page 96, Column 2, Delete Paragraph 8

Page 97, Column 1, Delete Paragraph 1

Page 97, Column 1, Paragraph 2, Sentence 1

The remainder of the planning area, 197,299 acres, would be open to ORV use.

Page 97, Column 1, Paragraph 3, Sentence 2

Extensive use areas may require mechanical treatment and seeding in addition to restricted ORV use.

Page 97, Column 2, Delete Paragraphs 3 and 4

Page 97, Column 2, Delete Paragraph 5, Sentence 1

Page 98, Table 4.3 Was Revised As Shown

**TABLE 4.3
CONSTRAINTS ON OIL AND GAS EXPLORATION AND DEVELOPMENT (ALTERNATIVE C)¹**

Management Categories	High Development Potential	Acres	Moderate Development Potential	Acres	
1. Open Subject to Standard Terms and Conditions These are areas where standard terms and conditions are sufficient to protect other land uses or resource values.	Total subsurface acreage with high development potential minus acreage in categories 2 and 3 below.	353,291	Total subsurface acreage with moderate development potential minus acreage in categories 2 and 3 below.	297,779	
2. Open Subject to Seasonal or Other Minor Constraints These are areas where moderately restrictive lease stipulations (such as seasonal restrictions) may be required to mitigate impacts to other land uses or resource values.	* Kevin Rim area * Sweet Grass Hills (East & West Buttes) area outside ACEC * Cow Creek Corridor ACEC * Crucial wildlife areas in the Havre Resource Area	257,365	* A small portion of Cow Creek Corridor ACEC * Crucial wildlife areas in the Havre Resource Area	94,808	
3. Closed to Leasing These are areas where other land uses or resource values cannot be adequately protected even with the most restrictive lease stipulations. Appropriate protection can only be ensured by closing the lands to leasing.	* UMNWSR * WSAs Sweet Grass Hills (East, West, & Middle Buttes) ACEC including the 529 acre BR revocation on East Butte	85,023	* UMNWSR * WSAs	33,251	
TOTAL HIGH		695,629	TOTAL MODERATE		425,838

¹BLM, 1987

Page 98, Column 1, Delete Paragraphs 2 and 3

Page 98, Column 2, Paragraph 3, Sentences 2 & 3

Existing claims could still be worked and proceed to patent under this alternative. The need to wait for formal approval from two separate agencies (BLM and DSL) would be a moderate negative impact to operators and affect the development of mineral resources.

Page 99, Column 1, Delete Paragraph 1

Page 99, Column 1, Paragraph 8

ORV management would allow for maximum protection of vegetation. Sedimentary soils and riparian areas would be protected by limiting vehicle use to existing roads and trails. In addition, vehicle use would be prohibited on these roads and trails during the wet season.

Page 100, Column 1, Paragraph 2

The 15,689 acres of land identified for disposal contains the following habitat: 345 acres of crucial spring sharp-tail grouse habitat, 80 acres of crucial winter/spring sage grouse habitat, 200 acres of crucial ring-necked pheasant habitat and a 39-acre wetland unit.

Page 100, Column 1, Paragraph 3, Sentence 2

A moderate negative impact could occur if these 15,689 acres were sold because the 625 acres of crucial habitat described above would be lost.

Page 100, Column 1, Paragraph 9

Restrictions placed on mineral leases and land authorizations on the Kevin Rim would reduce the amount and intensity of disturbance to raptors. Limiting new ROWs to the west side of Kevin Rim would provide added protection for nesting raptors and increase the potential for successful peregrine falcon hacking. Hunting areas used by raptors would be protected east of the escarpment. These impacts would create locally significant, but minor overall positive impacts.

Page 100, Column 2, Paragraph 1, Sentences 2 and 3

A large open pit operation developed on valid existing rights could have long-term significant negative impacts on big game by reducing habitat.

Page 100, Column 2, Paragraph 6, Sentence 4

Approximately 15,689 acres could be lost as trading stock for high value range resources.

Page 101, Column 1, Paragraph 9, Sentence 1

This alternative would dispose of 15,689 acres of isolated land, resulting in the loss of about 138 archaeological and historical sites.

Page 101, Column 2, Paragraph 2, Delete Sentences 4 and 5

Page 102, Column 1, Paragraph 1, Sentences 3 and 4

Overall, such disturbance would be a minor negative impact. However, increased public awareness, via the development of interpretive sites, would enhance cultural resources along the Missouri River and would be a moderate positive impact.

Page 102, Column 1, Delete Paragraph 3

Page 103, Column 1, Paragraph 3, Sentences 1 and 2

Landownership transactions under this alternative could result in the disposal of 15,689 acres of public land. If exchanges were used as the only method of disposal, the exchange of 15,689 acres of public land for private and/or state land would have a minor net fiscal effect on Payment In Lieu of Taxes, State Equalization Payments and annual county property tax revenues.

Page 103, Column 1, Paragraph 5, Insert After 1st Sentence

This could have a locally moderate negative impact on the mineral and utility industries, but would only have a minor overall impact to the local economy of the planning area.

Page 103, Column 1, Paragraph 5, Sentence 3

Prohibiting location of communication sites on West and Middle Buttes of the Sweet Grass Hills would probably have little or no impact to industry because East Butte would remain open to communication site location.

Page 103, Column 2, Paragraph 2, Sentences 2 and 3

Timing or distance restrictions around active raptor or peregrine nest sites could restrict resource development and subsequently the associated economic benefits. While these restrictions would result in time delays and increased operating costs to oil and gas development overall in the area, they would create only a minor impact to the economy in the planning area.

Page 103, Column 2, Paragraph 3

Managing the Sweet Grass Hills under special management guidelines would not preclude utilization of the area for grazing, recreation and oil and gas activities, but would preclude the potential for some mineral resource development and subsequently the associated economic benefits. Economic impacts from mineral exploration and development are discussed under the Errata entry for page 79, column 2, paragraphs 4 and 5. Some ranch operations could experience a disruption of current grazing practices with a change in grazing management to emphasize maintenance of elk winter habitat. There would be no significant change in current economic and social trends. These changes would create minor impacts to the local economy.

Page 104, Column 2, Paragraph 1

This alternative would provide the opportunity for private sector development with limits on the type and intensity. Annual revenue for concessions and local businesses could increase in the long-term, but this impact would be minor.

Page 105, Column 1, Delete Paragraph 3

Page 105, Column 1, Paragraph 1, Second Sentence

Potentially, 15,689 acres could be disposed of by exchange or sale. An additional 34,428 acres could be exchanged or if they meet FLPMA sale criteria, sold.*

*This change also applies to the following locations.

Page 105, Column 2, Paragraph 6

Page 106, Column 2, Paragraph 6

Page 108, Column 1, Paragraph 4, 1st Sentence

Page 109, Column 2, Paragraph 4, 1st Sentence

Page 111, Column 2, Paragraph 10, 1st Sentence

Page 105, Column 1, Paragraph 4

This alternative limits vehicular use to existing roads year long on 118,156 acres and seasonally on 199,034 acres (April 1 to November 1) of sedimentary breaks soils and riparian areas. Locally significant, but moderate overall positive impacts would result from limiting ORV use because the fragile and highly erodible soils would not be disturbed by ORVs and would not suffer accelerated erosion and loss of productivity.

Page 105, Column 1, Paragraph 5, Sentence 1

Impacts would not be expected on the 199,034 acres of sedimentary breaks type soils which would be open to ORV use from November 1 to April 1. Soils would normally be frozen during this period and impacts would be minor.

Page 105, Column 1, Paragraph 6, Sentence 1

The remainder of the planning area, 197,984 acres, would be open to ORV use.

Page 105, Column 2, Paragraph 5, Sentence 3

This alternative would produce few negative impacts because developments would be mitigated to protect soils and other natural resources.

Page 105, Column 2, Paragraph 7, Sentence 4

Potentially 50,117 acres could be exchanged or sold for other lands in special management areas and other areas of high resource values.

Page 106, Column 1, Paragraph 4

This alternative limits vehicular use to designated roads and trails year long on 118,156 acres and seasonally (April 1 to November 1) on 199,034 acres of sedimentary soils. Locally significant, but moderate overall positive benefits would result because of the reduced disturbance on fragile and highly erodible soils and the reduction of accelerated erosion.

Page 106, Column 1, Paragraph 5, Sentence 2

No significant impacts would be expected.

Page 106, Column 1, Paragraph 6, Sentence 1

The remainder of the planning area, 197,984 acres, would be open to ORV use.

Page 106, Column 2, Delete Paragraph 7

Page 107, Table 4.4 was revised as shown

TABLE 4.4
CONSTRAINTS ON OIL & GAS EXPLORATION & DEVELOPMENT (ALTERNATIVE D)¹

Management Categories	High Development Potential	Acres	Moderate Development Potential	Acres
1. Open Subject to Standard Terms and Conditions These are areas where standard terms and conditions are sufficient to protect other land uses or resource values.	Total subsurface acreage with high development potential minus acreage in categories 2 and 3 below.	353,921	Total subsurface acreage with moderate development potential minus acreage in categories 2 and 3 below.	297,779
2. Open Subject to Seasonal or Other Minor Constraints These are areas where moderately restrictive lease stipulations (such as seasonal restrictions) may be required to mitigate impacts to other land uses or resource values.	* Kevin Rim Area Sweet Grass Hills (East & West Buttes) area including the 529 acre BR revocation * Cow Creek ACEC * Crucial wildlife areas in the Havre Resource Area	264,321	* A small portion of Cow Creek ACEC * Crucial wildlife areas in the Havre Resource Area	94,808
3. Closed to Leasing These are areas where other land uses or resource values cannot be adequately protected even with the most restrictive lease stipulations. Appropriate protection can only be ensured by closing the lands to leasing.	* WSAs * UMNWSR	77,387	* WSAs * UMNWSR	33,251
	TOTAL HIGH	695,629	TOTAL MODERATE	425,838

¹BLM, 1987

Page 107, Column 1, Paragraph 2, Sentence 1

Locatable mineral development authorization for roads, pipelines, powerlines, ditches, etc. would be included in a properly filed Notice or an approved Plan under the surface management regulations (43 CFR 3809).

Page 107, Column 2, Delete Paragraph 1

Page 107, Column 2, Paragraph 3, Last Sentence

The additional workload involved in Plan preparation, over that of a Notice and the need to wait for formal approval would be a minor negative impact to operators and development of the mineral resources.

Page 108, Column 1, Paragraph 1, Sentence 3

Opening these lands to mineral entry would allow exploration activities that would more accurately assess the development potential of these lands, and would provide for the extraction of any economic deposits discovered.

Page 108, Column 1, Paragraph 3, Sentence 2

This would be a minor impact because there is little locatable mineral potential.

Page 108, Column 1, Paragraph 4, Sentence 4

This situation would be permanent on 15,689 acres which could be disposed of, since this acreage might be sold without acquisition, even though exchange would still be the preferred method and disposal.

Page 108, Column 1, Paragraph 6, Replace Last Sentence

Restrictions on ORV use to protect vegetation and other resources would create moderate benefits for vegetation.

Page 108, Column 1, Paragraph 7

Impacts to vegetation resulting from ROW location would be moderately beneficial under this alternative because ROWs would be excluded in several areas and avoided in a number of others. Denying use of West and Middle Buttes of the Sweet Grass Hills as communication sites would protect vegetation on this site from disturbance related to site construction.

Vegetation would benefit from limiting impacts such as physical trampling or removal of vegetation and indirect damage by increasing soil erosion and compaction.

Page 108, Column 2, Paragraph 2, Sentence 2

Opening 529.67 acres on East Butte to mineral entry may lead to the loss of some vegetation through trampling or indirectly by soil erosion resulting from soil disturbance.

Page 108, Column 2, Paragraph 7, 1st Sentence

Under this alternative, 15,689 acres would be available for disposal through exchange or sale.

Page 108, Column 2, Paragraph 8, Sentence 1 and 2

An additional 34,428 acres would be available for disposal through exchange and possibly sale, if parcels meet Federal Land Policy & Management Act sale criteria. These lands provide the following crucial wildlife habitats: 7,340 acres of crucial year long mule deer habitat; 405 acres of antelope winter habitat; 865 acres spring sharp-tailed grouse habitat; and 650 acres winter/spring sage grouse habitat.

Page 109, Column 1, Paragraph 2, Sentence 1 and 2

A moderate negative impact to 625 acres of crucial wildlife habitat could occur, if the 15,689 acres were disposed of. A moderate negative impact could occur to an additional 9,260 acres if 34,428 acres are sold or exchanged and land uses change.

Page 109, Column 1, Paragraph 7, Sentence 1

Wildlife would benefit by avoiding or excluding ROWs in wilderness study areas, the Cow Creek area, the Missouri River Corridor, and the West and Middle Buttes of the Sweet Grass Hills.

Page 109, Column 1, Paragraph 8, Sentence 2

Identifying ROW corridors and widths at the activity plan level would limit disturbance in the remaining areas of the rim.

Page 109, Column 2, Paragraph 1, Sentence 5

Opening 529.67 acres of land on East Butte to minerals entry could create a new disturbance to elk, raptors, and deer in this area.

Page 109, Column 2, Paragraphs 4 and 5

The 15,689 acres, and possibly an additional 34,428 acres not yet inventoried, could be disposed of through sale, exchange, or other means. Less than full implementation of the land tenure objectives, or disposal other than by exchange, the preferred method, would moderately decrease the opportunities for improved grazing management opportunities.

Page 109, Column 2, Delete Paragraph 5

Page 109, Column 2, Paragraph 6, Sentence 2

The 50,117 acres would be the maximum amount that could be disposed of through exchange.

Page 110, Column 1, Paragraph 6, Sentences 1, 2 and 3

Disposal through exchange or sale of 15,689 acres could affect 138 sites. Approximately 27 of these sites would be valuable enough to warrant retention. Exchange or sale (if the area meets Federal Land Policy & Management Act sale criteria) of an additional 34,428 acres may affect approximately 305 sites of undetermined value. Of these sites, about 61 might be valuable enough to warrant retention.

Page 110, Column 2, Paragraph 2, Sentence 2

- Prohibiting communication site location on West and Middle Buttes of the Sweet Grass Hills would decrease the potential of disturbing traditional Native American religious practices or cultural sites.

Page 110, Column 2, Paragraph 4, Sentence 3

However, significant impacts would continue to occur to both cultural and religious sites because hardrock mineral activity, as described in Alternative A, would continue.

Page 110, Column 2, Paragraph 5, Sentence 2

This would be a significant negative impact because the lands could then be disturbed by hardrock mineral activity.

Page 111, Column 1, Paragraph 2, Sentence 1

Providing 15,689 acres for disposal through sale or exchange and an additional 34,428 acres for disposal through exchange and possibly sale, would include 6,440 acres of public lands which currently have public access.

Page 111, Column 2, Paragraph 10, Sentence 2

If exchanges were used as the only method of disposal, the exchange of 50,117 acres of public lands for private and/or state lands would have a minor net fiscal affect on Payment In Lieu Of Taxes, State Equalization Payments and annual county property tax revenues.

Page 112, Column 1, Paragraph 3

The designation of avoidance and exclusion areas could cause a utility or transportation corridor to take a longer route, and thus increase the cost of construction for transmission lines. The actual impact cannot be assessed further without specific details of a proposed corridor. With East Butte an established communication site, denying location of communication sites on Middle and West Buttes of the Sweet Grass Hills would probably have little impact on development of future communication sites. All other areas open to rights-of-way location would not limit or curtail utility corridor development for transmission lines or the development of communication sites. These changes could have a locally moderate impact on the mineral and utility industries but would only have a minor impact overall to the local economy in the planning area.

Page 112, Column 1, Paragraph 4

Managing Kevin Rim under special management guidelines would not preclude utilizing the area for grazing, recreation, oil/gas, mineral and other resource development, but would restrict activities in sensitive areas. Timing restrictions or distance restrictions around active raptor or peregrine nest sites could restrict resource development and subsequently the associated economic benefits. While these restrictions would result in time delays and increased operating costs to oil and gas development overall in the area, they would create only a minor impact to the economy in the planning area.

Page 112, Column 1, Paragraph 5

Managing the Sweet Grass Hills under special management guidelines would not preclude utilizing the area for grazing, recreation, oil/gas, and mineral resource development and subsequently the associated economic benefits. Economic impacts from mineral exploration and development are discussed under Impacts Common to All Alternatives in the Chapter 4 Errata portion of this document. Some ranch operations could experience a disruption of current grazing practices with a change in grazing management to emphasize maintenance of elk winter habitat. There would be no significant change in current economic and social trends, but these changes could have a minor impact to the local economy.

Page 112, Column 2, Paragraph 6, Sentence 1

This alternative provides for some recreation developments and encourages private sector initiatives in developing river management opportunities.

Page 113, Column 1, Paragraph 1, Sentence 1

Sedimentary breaks soils designated open, would receive locally significant impacts due to the development of trail-road erosion, travel on wet soils, wind erosion on sandy soils and increased water erosion during wet periods.

Page 113, Column 1, Paragraph 1, Last Sentence

Limitations on ORV use of some sedimentary soils (148,335 acres) would create a locally significant, but moderate overall positive impacts due to protection of easily disturbed soils.

Page 113, Column 1, Paragraph 2

Construction and maintenance of ROW facilities in high erosion susceptibility areas (shallow soils, slopes greater than 25% sparse native vegetation, and slumping and mass wasting areas 100,000 acres) could cause locally significant long-term damages.

Page 113, Column 1, Paragraph 3, Sentence 1

Locally significant negative impacts could occur from open ORV use on 168,855 acres of sedimentary soils and riparian areas.

Page 113, Column 1, Paragraph 3, Sentence 3

ORV limitations on 148,335 acres would create locally significant, but moderate overall impacts by protecting easily disturbed soils. ROW location on steep sedimentary soils and riparian areas (comprising about 100,000 acres) could create locally significant runoff problems.

Page 113, Column 1, Paragraphs 5 and 6

Permitting locatable minerals exploration and development on 529.67 acres of a currently withdrawn area in the Sweet Grass Hills would be a significant positive impact to the minerals industry, due to the high potential for mineral occurrence.

Page 113, Column 1, Paragraph 7

The disposal of 44,143 acres could result in a moderate loss of native vegetation. Intensive ORV use on 6 acres could be locally significant. Significant adverse impacts to riparian areas could occur. A major hardrock mining development in the Sweet Grass Hills could significantly damage vegetation in a localized area.

Page 113, Column 1, Paragraphs 9, 10 and 11

There could be a long-term loss or gain of crucial habitat through land disposal actions. Nesting raptors would be significantly damaged by long-term surface disturbing activities on the Kevin Rim.

Potential large mining operations in the Sweet Grass Hills may create long-term significant damage to elk habitat and populations.

Grazing

A long-term improvement in management opportunities may be possible through disposal of 44,143 acres, primarily through exchange.

Page 113, Column 2, Delete Paragraph 5

Page 113, Column 2, Paragraph 7

Increased soil and water erosion would occur locally over 285,190 acres because of ORV use on sedimentary soils. Limiting ORV use on 32,000 acres of sedimentary soils would create locally significant, but moderate overall impacts by protecting easily disturbed soils.

Page 113, Column 2, Paragraph 8

ROW siting could result in locally significant soil erosion and slumping in fragile environments with shale, steep slopes, and sparse vegetation and in riparian areas (72,000 acres). Reduced streambank stability and increased soil compaction around recreation facilities on the UMNWSR could be locally moderate.

Page 113, Column 2, Paragraph 9

Locally significant negative impacts would occur from open ORV use on 285,190 acres of sedimentary soils and riparian areas. ORV limitations on 32,000 acres would create locally significant, but moderate overall impacts by protecting easily disturbed soils. ROW location on steep sedimentary soils and riparian areas comprising about 72,000 acres could create locally significant runoff problems.

Page 113, Column 2, Paragraph 10

Continuing the no lease policy in the UMNWSR Corridor could result in federal oil and gas drainage by state and private wells. Permitting locatable minerals exploration and development on 529.67 acres of currently withdrawn area in the Sweet Grass Hills would be a locally significant positive mineral effect due to the high potential for mineral occurrence.

Page 114, Column 1, Paragraph 1, Insert After Sentence 2

Significant adverse impacts to riparian areas could occur. A major hardrock mining development in the Sweet Grass Hills could significantly damage vegetation in a localized area.

Page 114, Column 1, Paragraphs 2, 3 4, and 5

There could be a long-term loss or gain of crucial wildlife habitat through land disposal actions involving 50,117 acres. Wildlife could be stressed and habitat impacted in areas of sedimentary soils as a result of ORV use. Transmission lines would significantly impact raptors in localized areas. Nesting raptors would be significantly damaged by long-term disturbance activities on Kevin Rim. Potential large mining operations in the Sweet Grass Hills may create long-term significant damage to elk habitat and populations.

Grazing

A long-term improvement or loss of management opportunities may be possible through disposal of 50,117 acres, primarily through exchange.

Page 114, Column 1, Delete Paragraph 10

Page 114, Column 1, Paragraph 12

There would be a long-term positive impact on 317,190 acres, which includes areas of sedimentary breaks soils and riparian areas, where ORV use would be limited to roads, trails or ways.

Page 114, Column 2, Paragraph 3, Sentence 1

There would be a long-term positive impact on 317,190 acres, which includes areas of sedimentary breaks soils and riparian areas where ORV use would be limited to roads, trails and ways by reducing sedimentation of water in these areas.

Page 114, Column 2, Insert and End of Paragraph 3

Intensive riparian management would improve streambank stability and reduce sedimentation in the Cow Creek area.

Page 114, Column 2, Replaces Sentences 3 and 4 of Paragraph 4, and All Of Paragraphs 5 and 6

Routing pipelines around ROW exclusion and avoidance areas would result in moderate cost increases to industry in these locations. Implementation of special stipulations on Kevin Rim could increase costs due to delays. An additional workload to the mineral industry would result in cases of small (less than 5 acres) disturbances. Withdrawing the Sweet Grass Hills, including 529.67 acres currently withdrawn by Bureau of Reclamation, from new mineral entry would create a significant long-term impact to the mineral industry. Drainage of federal minerals in the UMNWSR and Sweet Grass Hills could result in a significant long-term impact.

Page 114, Column 2, Paragraph 7, Sentence 3

Major hardrock mining developments on valid, existing claims in the Sweet Grass Hills could significantly disturb vegetation in a localized area. Vegetation in Cow Creek would improve because of riparian enhancement.

Page 114, Column 2, Paragraph 8

Wildlife values could increase or decrease on 15,689 acres identified for disposal. Seasonal ORV restrictions would improve wildlife habitat. Implementation of special stipulations in Kevin Rim and Sweet Grass Hills would significantly improve conditions for raptor habitat. Larger hard-rock mining developments on valid existing claims in the Sweet Grass Hills could reduce big game habitat. Improving riparian areas in Cow Creek would improve wildlife habitat.

Page 114, Column 2, Paragraph 9

A long-term improvement or loss of management opportunities could result through disposal of 15,689 acres.

Page 115, Column 1, Paragraph 1, Delete Sentences 1, 2 and 3

Page 115, Column 1, Insert At End Of Paragraph 1

Increased public awareness of cultural values in the Upper Missouri National Wild and Scenic River would reduce disturbance to cultural resources.

Page 115, Column 1, Insert At End Of Paragraph 2

Visual qualities would be enhanced or protected in Cow Creek.

Page 115, Column 1, Paragraph 3

Routing ROW facilities around exclusion or avoidance areas would increase costs. A moderate improvement in opportunities for Native Americans to utilize the Sweet Grass Hills for religious purposes would occur.

Page 115, Column 1, Move Paragraph 4, Sentence 1, From This Location

To Page 115, Column 2, After Paragraph 1

Page 115 Column 1, Paragraph 4, Delete Sentences 2 and 3 and Paragraph 5

Page 115, Column 1, Paragraph 6, Sentence 6

There would be a long-term positive impact on 317,190 acres, which includes areas of sedimentary breaks soil and riparian areas where ORV use would be limited to roads, trails or ways.

Page 115, Column 1, Paragraphs 9 and 10

There would be a long-term positive impact on 317,190 acres, which includes areas of sedimentary breaks soils and riparian areas, where ORV use would be limited to roads, trails and ways by reducing sedimentation of water in these areas. Locally significant decreases in water quality could result from increased erosion from seasonal ORV use of 199,034 acres of sedimentary soils. Increased sediment loads may occur because of ROW disturbance to some sedimentary soils. In Cow Creek, intensive riparian management would allow significant improvement of streambank stability and water quality.

Page 115, Column 2, Insert In Front Of Paragraph 1

Minerals

Routing pipelines around right-of-way exclusion and avoidance areas would result in moderate cost increases to industry in these locations. Implementation of special stipulations on Kevin Rim could increase costs due to delays. An additional workload to the mineral industry would result in cases of small (less than 5 acres) disturbances.

Page 115, Column 2, Insert Between Paragraphs 1 and 2

Continuing the no lease policy for oil and gas in the Upper Missouri National Wild and Scenic River Corridor could result in drainage of federal oil and gas by state and private wells.

Page 115, Column 2, Paragraphs 5, 6, 7 and 8

There could be a long-term loss or gain of crucial wildlife habitat through land disposal actions involving 50,117 acres. Seasonal off-road vehicle restrictions would improve wildlife habitat.

Implementing special stipulations in Kevin Rim and Sweet Grass Hills would significantly improve conditions for raptor habitat. Large hardrock mining developments in the Sweet Grass Hills could reduce big game habitat. Improving riparian areas in Cow Creek would improve wildlife habitat.

Page 115, Column 2, Paragraph 9

A long-term improvement or loss of management opportunities may be possible through disposal of 50,117 acres, primarily through exchange.

Page 115, Column 2, Insert After Paragraph 11

Increased public awareness of cultural values in the Upper Missouri National Wild and Scenic River would reduce disturbance to cultural resources.

Page 115, Column 2, Insert At End Of Paragraph 12

Visual qualities would be enhanced or protected in Cow Creek.

Page 115, Column 2, Add To Front Of Paragraph 14

Routing right-of-way facilities around exclusion or avoidance areas would increase costs.

Page 116, Column 1, Insert This Paragraph Before Paragraph 4

Off-road vehicle use within sedimentary breaks and riparian areas could result in increased sedimentation of adjacent and downstream waterways due to increased soil erosion.

Page 116, Column 1, Paragraph 5

Opening 529.67 acres, currently withdrawn in the Sweet Grass Hills to location and entry under the mining laws, would be a commitment of that mineral resource.

Page 116, Column 1, Paragraph 6

Off-road vehicle use of riparian areas and intensive use on 6 acres could create significant damage to vegetation in this area.

Page 116, Column 1, Paragraphs 7 and 8

Sedimentary breaks soils and glaciated prairie drainage soils could be significantly damaged by off-road vehicle use. Even limited off-road vehicle use on fragile soils would generally cause a drastic reduction in soil productivity and values. Locally significant damage to riparian soils could occur from off-road vehicle damage to streambanks and resultant increased wind and water erosion.

Locally significant soils damages would occur from right-of-way facilities construction-maintenance in high erosion susceptible areas, such as: shallow soils; slopes greater than 25%; sparse native vegetation; and slumping and mass wasting areas.

Page 116, Column 1, Insert This Paragraph Before Paragraph 9

Off-road vehicle use within sedimentary breaks and riparian areas could result in increased sedimentation of adjacent and downstream waterways due to increased soil erosion.

Page 116, Column 1, Paragraph 10

Permitting locatable mineral exploration and development on 529.67 acres of currently withdrawn area in the Sweet Grass Hills would be a commitment of that mineral resource.

Page 116, Column 2, Paragraph 1

Off-road vehicle use of riparian areas and intensive use on 20 acres could create significant damage to vegetation in this area.

Page 116, Column 2, Paragraph 3

Location of right-of-way facilities could result in locally significant impacts on sites which are not mitigatable.

Page 116, Column 2, Paragraph 5, Delete This Paragraph and Minerals Heading Above

Page 116, Column 2, Delete Paragraph 6 With Vegetation Heading Above

Page 116, Column 2, Paragraph 8

Location of right-of-way facilities could result in locally significant impacts on sites which are not mitigatable.

Page 116, Column 2, Paragraph 10

Permitting locatable mineral exploration and development on 529.67 acres of currently withdrawn area in the Sweet Grass Hills would be a commitment of that mineral resource.

Page 116, Column 2, Delete Paragraph 11 With Vegetation Heading Above

