

Billings and Pompeys Pillar National Monument Resource Management Plans

SCOPING COMMENT SUMMARY

November 2008

Billings and Pompeys Pillar National Monument Resource Management Plans

BLM



Scoping Comment Summary

A Notice of Intent to prepare the resource management plans (RMPs) for the Billings and Pompeys Pillar NM was published in the Federal Register on May 15, 2008. This notice served as the beginning of BLM's formal scoping process.

The notice was followed by a news release announcing scoping. In addition, over 1,200 scoping packages were mailed to potential stakeholders, agencies, organizations and tribes. A website for the Billings and Pompeys Pillar NM RMPs was launched that provides the public access to planning documents, calendars, information on the planning process, as well as a photo gallery of the planning area. The website will continued to be updated throughout the planning process. Another news release was issued and postcards distributed to the mailing list in July 2008 announcing the dates, locations and times of seven public scoping open house meetings across the planning area. All of these outreach tools conveyed information about the planning process, preliminary planning issues, special designations and an overview of the planning area.

The BLM hosted scoping open houses to provide the public with opportunities to become involved, to learn about the planning process, to meet the RMP team members, and to offer comments and input on the plans. The open houses were held across the planning area in seven communities. The open houses were held in the following locations:

August 11	Pompeys Pillar NM	7 - 9 pm
August 12	Bridger	7 - 9 pm
August 13	Big Timber	7 - 9 pm
August 14	Red Lodge	7 - 9 pm
August 18	Lovell, WY	7 - 9 pm
August 19	Roundup	7 - 9 pm
August 20	Billings	7 - 9 pm

About 90 participants attended the open houses and visited with resource specialists, reviewed maps or asked questions about the planning process or specific concerns. BLM extended the formal scoping comment period to September 19, 2008. Submissions received after this date will be considered in alternative formulation and project planning.

A total of 129 written submissions and e mails were received by September 19, 2008. Some submissions were as brief as a sentence or two; others were over 25 pages long. Many offered substantive comments, while others conveyed a want or an opinion. All submissions indicated an interest in the management of public lands and resources.

The BLM considers scoping to be an open, long-term opportunity that does not formally end with the publication of this scoping report. Public comments will be accepted until the draft RMPs are sent to the printer, although comments were most useful for this stage in the process if received by September 19, 2008. The comment forms, scoping package, the Federal Register NOI and a notice at the public scoping meetings provided instructions on requesting confidentiality and on requesting that individual names or addresses be withheld from public

review or from disclosure under the Freedom of Information Act. No commentors requested confidentiality in their submissions.

All scoping comments were distributed to the planning team. A team collectively read all submissions and identified for either the Billings RMP or the Pompeys Pillar NM RMP. Most written submissions included a number of various comments. Therefore, the 129 submissions reflected a total of 575 separately-coded comments. Of the 575 comments, 60 comments were specific to the Pompeys Pillar NM RMP. The comments are separated by RMP: 515 comments specific to the Billings RMP and 60 comments specific to the Pompeys Pillar NM RMP.

Upon the team review of comments, the 575 specific comments were coded into 32 subject categories and 23 subcategories. These categories are guidance-based resource sections for an RMP and the subcategories are based on the comments received (see table below). Most of the coded comment letters contained several specific comments covering various categories and appear more than once if they referenced several categories.

Following are the specific comments by category and subcategory for the Billings RMP and the Pompeys Pillar NM RMP comments. For more detailed information about the scoping process, planning issues and criteria, refer to the scoping report available on the RMP website at http://www.blm.gov/mt/st/en/fo/billings_field_office.html.

Subject Category or Subcategory	Category No.	Subcategory No.
Resources – General	1000	
Air Quality	1050	
Climate Change	1070	
Cultural Heritage	1100	
Fish and Wildlife	1150	
Special Status Species (Animals, Fish, Plants)	1300	
Prairie Dog		1301
Sage Grouse		1302
Threatened, Endangered & Sensitive Species		1303
Soil	1350	
Vegetation/Native Plants	1400	
Riparian		1401
Noxious and Invasive Plants		1403
Wildland Fire	1460	
Wild Horses and Burros	1470	
Water	1500	
Resource Uses – General	2000	
Forestry	2050	
Lands and Realty	2100	
Access		2101
Land Tenure		2102
Utility and Communication Corridors		2103
Livestock Grazing	2150	
Energy and Minerals	2200	
Oil and Gas		2210
Coal		2211
Wind Energy		2215
Recreation	2250	
Camping		2251
Viewshed		2252
Hunting and Fishing		2255
User Fees		2256
Trails and Travel Management (Transportation)	2300	
Motorized		2310
Non-Motorized		2311
Airstrips		2312
Special Designations	4000	
ACECs	4050	
Wild and Scenic Rivers	4200	
Wilderness Study Areas	4250	
Wilderness Characteristics	4300	
Pryor Mountain Wild Horse Range	4350	
National Historic Trails	4400	
Social and Economic Conditions		
Economics	5050	
Social	5100	
Process – General	6000	
Management	6050	
Implementation		6051
Sustainability		6052
Protection		6053
Restoration		6054
Multiple Use		6055
Planning/NEPA	6150	
Outside Scope	7000	

Billings RMP Scoping Comments

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
1000	SC028	I believe that the management plan should provide direction that will protect biological and recreational values (hunting) by discouraging residential development on private wildlands adjacent to public land.
1000	SC042	Protection of dark night skies from light pollution.
1000	SC101	In fact, internal agency bias, bent far left, overrides grass roots input and leads to lock up of most of our commodity resources.. Recreation and wildlife are the winners. Consider what happened in the case of the Upper Missouri Monument. What a scam.
1000	SC102	I believe that in the long-term, the public, the actual owners of public land, will be better served, and the land certainly better protected, if more emphasis is put on recreation use, and tourism, than the disproportional use and exploitation of special interest industries. Between tax breaks, subsidies, EPA clean-ups, and corruption, not to mention the damage to the land and wildlife, this is not diversified or balanced use, let alone sustainable. We cannot exterminate all the wild horses, buffalo, wolves, coyotes, prairie dogs, sage grouse, etc., rangeland, national monuments, streams and rivers, forests, etc, all for the sake of cattle, mining, and gas and oil.
1000	SC116	The current boom in oil and gas development and the attendant management challenges make it critical that the BLM use the best available tools to minimize impacts to valuable public land resources such as wildlife habitat, clean air and water, cultural resources, and lands with wilderness character.
1050	SC106	Wild horse and wildlife protect and responsible viewing opportunities. Special status species protection. Livestock grazing. Water and air quality issues. OHV travel. Cultural tourism.

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
1050	SC056	The Environmental Protection Agency (EPA), Region 8, Montana Office has reviewed the May 15, 2008 Notice of Intent to prepare a Resource Management Plan (RMP) for the Bureau of Land Management (BLM) Billings Field Office and Pompeys Pillar National Monument and an associated Environmental Impact Statement (EIS). The EPA reviews EIS's accordance with its responsibilities under the National Environmental Policy Act (NEP A) and Section 309 of the Clean' Air Act. Section 309 of the Clean Air Act directs EPA to review and comment in writing on the environmental impacts of any major Federal agency action. EPA's draft EIS comments will include a rating of both the environmental impact of the proposed action and the adequacy of analysis and disclosure in the NEPA document. We are enclosing a brief summary that explains EPA's DEIS rating' system. It is EPA's expectation that the Billings Field Office and Pompeys Pillar National Monument RMPs EIS fulfill the basic intent of NEPA, and encompass to the maximum extent possible the environmental and public involvement requirements of State and Federal laws, Executive Orders, and policies (e.g., Clean Water Act, Clean Air Act, Endangered Species Act, E.O.11990 Protection of Wetlands, etc.). EPA's primary interests are protection and restoration of water quality, riparian and aquatic habitats, groundwater quality, source water protection, wetlands and air quality. The EPA is particularly interested in seeing the RMPs and EIS disclose: -the existing conditions for all environmental resources and the specification of gaps in current knowledge; -the BLM's desired conditions to assure sustainability of environmental resources; - identification of areas not currently meeting desired conditions; -a specific set of goals and objectives to guide future actions toward achievement of the desired conditions; --Best Management Practices (BMPs) for water quality protection; protection of riparian areas and wetlands; reduced water quality, fisheries, and wildlife impacts from roads; and maintenance and restoration of watershed health to achieve water quality that fully supports beneficial uses of surface waters in cooperation with State EPA Total Maximum Daily Load (TMDL) development and implementation efforts; and a commitment to monitoring for determining the extent to which the RMP will achieve goals and objectives and to assure that BMPs are effective.
1070	SC042	Positioning for climate change. Effects on communities. WUI areas.
1070	SC107	The RMP should address how global warming may affect the RMP area and the steps the BLM should take to mitigate potential damages or changes.
1100	SC018	Maintain history and make it available to public and tourist. Educate the public about lands around us.
1100	SC042	Protection of historic and prehistoric resources and public access to these areas.

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
1100	SC049	The Northern Cheyenne tribe's primary concern is cultural resources and wants to be sure language is included that protects cultural resources.
1100	SC050	Within Billings Field Office we are concerned with treatment of historic and prehistoric resources, development of (or near), protection, and public access to these resources. Protection of resources important to our past.
1100	SC093	Pompeys Pillar is an important cultural resource. The Pryor Mountain Wild Horse Range should be expanded, as our wild horses are another important cultural resource.
1100	SC099	Assess how access provided for motorized vehicles will contribute to vandalism of historic and cultural sites.
1100	SC099	The RMP should explain how the agency will work with tribal governments and comply with the National Historic Preservation Act.
1100	SC099	The RMP should include information about what areas have been inventoried and how the BLM plans to expand its inventory of cultural, historic, and prehistoric sites. Importantly, it should address how the BLM will protect these sites once they are identified. What rules will govern the taking of artifacts?
1100	SC099	If the BLM has not completed an inventory of historic sites, how will the agency determine whether an area is appropriate to lease for oil and gas drilling?
1100	SC106	Expansion of the Pryor Mountain Wild Horse Range. Termination of lethal predator and "pest" control activities. Restriction on OHV travel and hunting. Voluntary livestock grazing permit buy-outs. Great protect of a significant wild horse herd. A full complement of faunal species for healthy ecosystem functioning and increase natural regulation of populations of wildlife. Increased public understanding and appreciation for historic and cultural resources.
1100	SC111	I am affiliated with the Rochejhone Chapter of the Lewis and Clark Trail Heritage Foundation. We are based in Billings and our main function is to help keep the legacy of the Expedition in the eyes of the people. My purpose today is to make our resources known to you and to offer our assistance when ever an opportunity may avail itself to help educate the public. Our membership has a significant background in many areas associated with the Expedition and would offer our expertise to you if the [floater's guide] series is ever updated or when ever Lewis and Clark information is involved. We see many opportunities and would like to meet with your staff at your convenience. I would be happy to serve as a contact for the body until a formal chain is established. I have personally mapped Clark's traverse line based on his survey logs in Stillwater County as well as some of Yellowstone County. That included an 1806 magnetic declination study as well as a historic fluvial morphology study, in

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		order to more closely locate Clark's campsites and horse crossing, etc.
1100	SC123	Strengthen all stipulations for oil, gas, coal, and coal bed methane leases to protect cultural and historic resources in exploration and mineral development areas.
1100	SC123	Give high priority to the acquisition by purchase or exchange of private properties of important historical and cultural importance to include the following: Weatherman Draw surrounding areas of access, Pryor Mountain areas of significant cultural resources.
1100	SC123	Develop a strong multi agency approach to study and analysis of the significance of early human occupation of the Bighorn Basin and adjacent areas.
1100	SC109	Assess how access provided for motorized vehicles will contribute to vandalism of historic and cultural sites.
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1100	SC109	If the BLM has not completed an inventory of historic sites, how will the agency determine whether an area is appropriate to lease for oil and gas drilling?
1150	SC028	The valley between the Pryor Range (actually a spur of the Bighorn Range) and the Absaroka-Beartooth Range is and will be an important migration corridor between two of the largest ranges in the Rocky Mountains. Fragmentation of the valley should be discouraged to maintain the integrity of the corridor.
1150	SC042	Protection of neo-tropical migrants, sage grouse and their habitat.
1150	SC053	This brief provides a cutting-edge, scientific framework which the agency can use to identify habitat and wildlife impacts that must be analyzed in planning. It demonstrates the potential impacts on wildlife of habitat fragmentation from oil and gas development at various well-pad densities, and offers methodologies to assist the BLM to fulfill its FLPMA and NEPA responsibilities to analyze the direct, indirect, and cumulative impacts on wildlife of proposed oil and gas development in the agency's resource management plans.
1150	SC053	Conduct a spatial analysis of the direct, indirect, and cumulative impacts on wildlife of all proposed oil and gas development alternatives.

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1150	SC053	Assess the habitat fragmentation effects of oil and gas development for maximum well-pad development densities.
1150	SC053	Use GIS technology to evaluate the impacts of oil and gas development on wildlife.
1150	SC116	This brief provides a cutting-edge, scientific framework which the agency can use to identify habitat and wildlife impacts that must be analyzed in planning. It demonstrates the potential impacts on wildlife of habitat fragmentation from oil and gas development at various well pad densities, and offers methodologies to assist the BLM to fulfill its FLPMA and NEPA responsibilities to analyze the direct, indirect, and cumulative impacts on wildlife of proposed oil and gas development in the agency's resource management plans. Employing the methodologies outlined in the brief will allow the BLM to effectively manage oil and gas development while ensure protection of the many other valuable resources on our public lands.
1150	SC053	Encourage research on habitat fragmentation indicators for wildlife of local importance.
1150	SC099	Areas and trails shall be located to minimize damage to soil, watershed, vegetation, air, or other resources of the public lands, and to prevent impairment of wilderness suitability (43 CFR § 8342). Areas and trails shall be located to minimize harassment of wildlife or significant disruption of wildlife habitats. Special attention will be given to protect endangered or threatened species and their habitats (43 CFR § 8342).
1150	SC099	In analyzing the impacts to elk and other big game, it is important to look at total road densities (as opposed to just open or designated road densities) and include all motorized "trails" in the density standard. Calculate current road densities and the road densities for all of the alternatives. Evaluate the impacts of motorized vehicles on threatened and endangered species, candidate species, management indicator species, sensitive species, and species of concern.
1150	SC099	Where possible, look for creative ways to keep the water cleaner and create nesting habitat for birds and other wildlife near reservoirs. Where possible pump and pipe water out of reservoirs and utilize water tanks.
1150	SC099	What about other key prairie species? Species which should be included in the analysis include the Northern Leopard Frog, Snapping Turtle, Spiny Softshell, Western Hog-nosed Snake, Milksnake, Common Loon, Bald Eagle, Whooping Crane, Piping Plover, Mountain Plover, Long-billed Curlew, Interior Least Tern, Black Tern, Burrowing Owl, Spotted Bat, Townsend's Big-eared Bat, Black-tailed Prairie Dog, Black-footed Ferret, Canada Lynx, American Bison. What opportunities exist to expand and restore habitat for these species?

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1150	SC099	The evidence that roads have an impact on wildlife is overwhelming. The RMP should incorporate studies such as the Cooperative Elk Logging Study, the most extensive wildlife research project ever undertaken by the Forest Service and State of Montana. The study provides irrefutable findings that roads - and motorized activity on them - impact elk. While lands managed by the Forest Service are generally more forested than those managed by the BLM, the impacts from roads and loss of security can be even greater in more open areas. The impact on elk and other wildlife from high road density needs to be addressed in the RMP.
1150	SC099	The award winning and highly annotated document by the Montana Chapter of the Wildlife Society on the effects of recreation on Rocky Mountain wildlife should also be considered and reviewed in the analysis.
1150	SC099	Are any BLM lands leased out for wind farms? Through the RMP process, some criterion should be developed which considers the appropriateness and compatibility of wind farms and other large industrial projects when situated in or adjacent to special management lands or lands with high wildlife values.
1150	SC106	Wild horse and wildlife protect and responsible viewing opportunities. Special status species protection. Livestock grazing. Water and air quality issues. OHV travel. Cultural tourism.
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1150	SC118	In regards to changes for the Billings Resource Management Plan, the Pryor Mountain Wild Mustang Center recommends that the Administrative Pasture area of the Pryor Mountain Wild Horse Range be reopened to use by the Pryor Mountain Wild Horses. This change would benefit the wild horses by providing them with more winter range. This change would likely benefit other wildlife in the area as well. The potential for expansion of the Pryor Mountain Wild Horse Range onto adjacent Bureau of Land Management lands should also be considered.

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1300	SC028	Many species of plants as well as several plant communities that occur in the Pryors and Clark's Fork valley are found nowhere else on earth. Only one other area of Montana has such high endemism.
1300	SC028	I suggest expanding the Meeteetse Spires ACEC to include populations of other rare plants.
1300	SC028	The Wild Horse Range has large areas of highly erodible soils because of the steep, poorly vegetated slopes. Several rare plants occur in this area. Special management of ORV use and horse trampling is needed in order to protect the biological values of this area. Southern toeslopes of the Pryor Range and small included valleys harbor populations of rare plants and endemic plant communities. This area should be considered for special designation.

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1300	SC099	Assess the role of OHV activities in the spread of noxious weeds on BLM-managed lands in the planning area, and on neighboring landowners and farmers. Inventory BLM lands for sensitive plant species. What areas within the planning area have been inventoried and how does the agency plan to inventory the remaining lands? Include appropriate management actions to limit the spread of noxious weeds. Preventing the introduction and spread of noxious and invasive weeds should be a high priority for the BLM. Noxious weeds degrade wildlife habitat, reduce wildlife related expenditures, threaten sensitive and rare plant communities, cost farmers money in forage and crop losses, and cause soil erosion. The BLM needs to address noxious weeds in the RMP, and the agency should continue to be proactive in working to halt the introduction and spread of weeds. According to BLM statistics, noxious weeds covered 91,000 acres of public land in Montana in 1985, and 292,000 acres in 1995. This amounts to a 320 percent increase in a mere 10 years! Roads and motorized routes are the most efficient means for the spread of invasive plants into the new areas. Treatment of weeds once they become established is costly and often ends with unsatisfactory results. The best and easiest way to stop weed infestations is to not let them start by restricting the vectors that weeds use to invade new areas. The Resource Management Plan must prepare for the future by continuing to implement policies that protect the land from noxious weed infestations. A minimal road and motorized trail system would make a considerable contribution to prevention efforts.
1300	SC099	What about other key prairie species? Species which should be included in the analysis include the Northern Leopard Frog, Snapping Turtle, Spiny Softshell, Western Hog-nosed Snake, Milksnake, Common Loon, Bald Eagle, Whooping Crane, Piping Plover, Mountain Plover, Long-billed Curlew, Interior Least Tern, Black Tern, Burrowing Owl, Spotted Bat, Townsend's Big-eared Bat, Black-tailed Prairie Dog, Black-footed Ferret, Canada Lynx, American Bison. What opportunities exist to expand and restore habitat for these species?
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1300	SC125	I would like to place into consideration the conservation of the rare plants and plant communities of the South Pryor Desert. This is based on the work Peter Lesica did in the 1990's. Lesica recommended setting aside one and a half sections in the Gypsum Creek - Crooked Creek area. T9S R27E, W half of R28E. (Did he mean the eastern half of R28E?) This would conserve 8 of 15 high priority vascular plant species. ACEC status might be appropriate.
1300	SC125	Threats to these plants and plant communities are off-road travel, introduction of weeds, cattle grazing. (This particular area may have been withdrawn from cattle grazing.) Some of the areas adjacent to the PMWHR are being proposed for annexation into the wild horse range, specifically Demijohn Flats. Grazing by horses may threaten these plants.
1300	SC126	Nora Taylor is already working through the RMP process to consider protection for the special and rare plants found in the South Pryor Desert. The focus is on the BLM lands to the east of Crooked Creek Road and between Penny Peak to the north and Gyp Springs to the south. Larry was helpful to explain grazing in the targeted area. The allotments are not used because of the lack of water. I now understand that Jared has responsibility for those grazing allotments.
1301	SC004	Prairie dogs are varmints, rodents and do destroy vegetation. When a BLM lease has adjoining private property and poisons the dog towns on his private land that adjoins BLM which also has prairie dogs on it, the lessee should be able to poison the prairie dogs on the BLM property. Money and poison should be available from the BLM to the lessee.
1301	SC099	Sage Grouse and Prairie Dogs are indicators of healthy native prairie ecosystems. Both are generally in trouble. What is the BLM doing to identify healthy habitat, monitor sage grouse and prairie dog populations and help them rebound?
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1302	SC042	Protection of neo-tropical migrants, sage grouse and their habitat.
1302	SC099	Sage Grouse and Prairie Dogs are indicators of healthy native prairie ecosystems. Both are generally in trouble. What is the BLM doing to identify healthy habitat, monitor sage grouse and prairie dog populations and help them rebound?
1302	SC122	I'm only interested in policies that would ultimately impact private or public lands in Musselshell, Golden Valley, or Wheatland counties (i.e., sage grouse management).

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
1302	SC109	Sage Grouse and Prairie Dogs are indicators of healthy native prairie ecosystems. Both are generally in trouble. What is the BLM doing to identify healthy habitat, monitor sage grouse and prairie dog populations and help them rebound?
1302	SC129	We are concerned that there appears to have developed a degree of misunderstanding between BLM and the Montana Department of Fish, Wildlife and Parks regarding critical habitat for sage grouse. For example, at RMP scoping meetings, BLM displayed a map of what were referred to as various levels of "critical habitat" for sage grouse. The MPA is concerned and requests that the designation of any habitat as critical, crucial or core be clearly defined and agreed upon. Similarly, a common definition for the quality and importance of habitat is necessary to avoid confusion and delay. MPA is extremely concerned about recommended stipulations to protect sage grouse, including: one well per 500 acres, a one-mile NSO and a four-mile timing restriction from active leks, no development in core or critical areas. Clearly, these recommendations will dramatically affect mineral resource development. MPA believes the current stipulations adequately protect grouse. For all but the most critical of sage grouse habitat, the current 1/4 mile NSO and 2-mile timing restrictions are the correct stipulations. These stipulations are supported by many published and peer reviewed scientific studies. One prominent example is a study by biologist Renee Taylor, of Taylor Environmental, Casper, WY, that members of MPA believe deserves consideration as BLM develops stipulations regarding sage grouse habitat. While sage grouse and other species' habitats have become the focus of resource agency actions, the MPA is concerned with an apparent and disturbing trendto file protest documents converging a wide range of wildlife. These protests often take the form of Requests for Restricted Development to address perceived and unsubstantiated threats to wildlife species that cause delay and result in time available for resource development that is unrealistic and unworkable. For example, an analysis of the Rawlins RMP by the Petroleum Association of Wyoming left a new development window of less than 90 days. That 90-day window, oddly enough, falls during hunting season. Wildlife stipulations need to allow reasonable access.
1303	SC053	Include oil and gas field development options that leave areas of threatened habitats undeveloped.
1303	SC099	In analyzing the impacts to elk and other big game, it is important to look at total road densities (as opposed to just open or designated road densities) and include all motorized "trails" in the density standard. Calculate current road densities and the road densities for all of the alternatives. Evaluate the impacts of motorized vehicles on threatened and endangered species, candidate species, management indicator species, sensitive species, and species of concern.

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
1303	SC099	What threatened and endangered species exist on these lands and how will the plan protect them? Habitat loss, degradation, and fragmentation often result from invasive and exotic plant and animal species, human population growth and transportation systems.
1303	SC056	The Environmental Protection Agency (EPA), Region 8, Montana Office has reviewed the May 15, 2008 Notice of Intent to prepare a Resource Management Plan (RMP) for the Bureau of Land Management (BLM) Billings Field Office and Pompeys Pillar National Monument and an associated Environmental Impact Statement (EIS). The EPA reviews EIS's accordance with its responsibilities under the National Environmental Policy Act (NEP A) and Section 309 of the Clean' Air Act. Section 309 of the Clean Air Act directs EPA to review and comment in writing on the environmental impacts of any major Federal agency action. EPA's draft EIS comments will include a rating of both the environmental impact of the proposed action and the adequacy of analysis and disclosure in the NEPA document. We are enclosing a brief summary that explains EPA's DEIS rating' system. It is EPA's expectation that the Billings Field Office and Pompeys Pillar National Monument RMPs EIS fulfill the basic intent of NEPA, and encompass to the maximum extent possible the environmental and public involvement requirements of State and Federal laws, Executive Orders, and policies (e.g., Clean Water Act, Clean Air Act, Endangered Species Act, E.O.11990 Protection of Wetlands, etc.). EPA's primary interests are protection and restoration of water quality, riparian and aquatic habitats, groundwater quality, source water protection, wetlands and air quality. The EPA is particularly interested in seeing the RMPs and EIS disclose: -the existing conditions for all environmental resources and the specification of gaps in current knowledge; -the BLM's desired conditions to assure sustainability of environmental resources; - identification of areas not currently meeting desired conditions; -a specific set of goals and objectives to guide future actions toward achievement of the desired conditions; --Best Management Practices (BMPs) for water quality protection; protection of riparian areas and wetlands; reduced water quality, fisheries, and wildlife impacts from roads; and maintenance and restoration of watershed health to achieve water quality that fully supports beneficial uses of surface waters in cooperation with State EPA Total Maximum Daily Load (TMDL) development and implementation efforts; and -a commitment to monitoring for determining the extent to which the RMP will achieve goals and objectives and to assure that BMPs are effective.
1303	SC109	In analyzing the impacts to elk and other big game, it is important to look at total road densities (as opposed to just open or designated road densities) and include all motorized "trails" in the density standard. Calculate current road densities and the road densities for all of the alternatives. Evaluate the impacts of motorized vehicles on threatened and endangered species, candidate species, management indicator species, sensitive species, and species of concern.

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
1303	SC109	What threatened and endangered species exist on these lands and how will the plan protect them? Habitat loss, degradation, and fragmentation often result from invasive and exotic plant and animal species, human population growth and transportation systems.
1350	SC028	Areas with high concentrations of endemic species should be considered for ACEC designation, especially those with highly erodible soils.
1350	SC028	The Wild Horse Range has large areas of highly erodible soils because of the steep, poorly vegetated slopes. Several rare plants occur in this area. Special management of ORV use and horse trampling is needed in order to protect the biological values of this area. Southern toeslopes of the Pryor Range and small included valleys harbor populations of rare plants and endemic plant communities. This area should be considered for special designation.
1400	SC028	Many species of plants as well as several plant communities that occur in the Pryors and Clark's Fork valley are found nowhere else on earth. Only one other area of Montana has such high endemism.
1400	SC028	The Wild Horse Range has large areas of highly erodible soils because of the steep, poorly vegetated slopes. Several rare plants occur in this area. Special management of ORV use and horse trampling is needed in order to protect the biological values of this area. Southern toeslopes of the Pryor Range and small included valleys harbor populations of rare plants and endemic plant communities. This area should be considered for special designation.
1400	SC094	Range management should be addressed in the RMP and the guidelines and indicators for healthy range conditions should be described in the new RMP. How will range conditions be monitored, and when corrections are needed, and how will they be implemented.
1400	SC099	Evaluate how motorized vehicles will impact vegetation and contribute to the spread of noxious weeds.
1400	SC099	Range management should be addressed in the RMP, or at least a synopsis of the watershed plans. The synopsis should describe the guidelines and indicators for healthy range conditions and the desired natural community. Further, the summary should describe the current condition of ranges and riparian areas and where improvements are needed, provide a plan that describes the steps which will be taken, and the benchmarks to determine whether the range and riparian areas are moving to a desired condition. Finally it should describe how range conditions be monitored.
1400	SC100	There are several reasons off road travel hurts the environment. It causes erosion, destroys vegetation and scatters noxious weeds. There is plenty of access in most polices for hunting, camping etc. Without having to drive a vehicle.

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
1400	SC107	The RMP should set guidelines for range management, indicators for healthy range conditions, monitoring, and remedial actions if necessary.
1400	SC117	Range management should be addressed in the RMP and the guidelines and indicators for healthy range conditions should be described in the new RMP. How will range conditions be monitored, and when corrections are needed, and how will they be implemented.
1400	SC120	Over use by certain users. Reduce AUMs, ATVs, and put serious thought into the areas for drilling-some areas should not have gas/oil activities at all and others need strict oversight. Gas and oil are not going to disappear so take your time deciding. Public land resources would have fewer weeds, more diverse vegetation to benefit wildlife and the biodiversity needed for a healthy environment.
1400	SC109	Evaluate how motorized vehicles will impact vegetation and contribute to the spread of noxious weeds.
1400	SC028	These populations and communities can be protected by restricting off-road vehicle use as well as oil and gas development in much but not all of the BLM land in the area.
1400	SC028	BLM policies should discourage residential development in the foothills of the Beartooth and gas development and mining on the fringe of the Pryor Range. In short, the Northern Bighorn Basin has many significant biological values that should be protected.
1400	SC109	Range management should be addressed in the RMP, or at least a synopsis of the watershed plans. The synopsis should describe the guidelines and indicators for healthy range conditions and the desired natural community. Further, the summary should describe the current condition of ranges and riparian areas and where improvements are needed, provide a plan that describes the steps which will be taken, and the benchmarks to determine whether the range and riparian areas are moving to a desired condition. Finally it should describe how range conditions be monitored.
1400	SC125	Reseeding of the desert areas of PMWHR with native grasses which might require doing test plots to assure that helicopter seeding and mulching would be effective. The Administrative Pasture of the PMWHR could be one test plot. Although this is within a WSA, reseeded would not impair the wilderness value of that pasture.
1401	SC109	Are there reservoirs where it might be beneficial to have them breached as a means to restoring historic prairie streams?
1401	SC048	Dramatic improvement in the range [if grazing leases retired], particularly the range of important riparian areas. The recovery could be so dramatic, you might stop spending millions on wild horses roundups with 30,000 managed on leased property.

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
1401	SC056	The Environmental Protection Agency (EPA), Region 8, Montana Office has reviewed the May 15, 2008 Notice of Intent to prepare a Resource Management Plan (RMP) for the Bureau of Land Management (BLM) Billings Field Office and Pompeys Pillar National Monument and an associated Environmental Impact Statement (EIS). The EPA reviews EIS's accordance with its responsibilities under the National Environmental Policy Act (NEP A) and Section 309 of the Clean' Air Act. Section 309 of the Clean Air Act directs EPA to review and comment in writing on the environmental impacts of any major Federal agency action. EPA's draft EIS comments will include a rating of both the environmental impact of the proposed action and the adequacy of analysis and disclosure in the NEPA document. We are enclosing a brief summary that explains EPA's DEIS rating' system. It is EPA's expectation that the Billings Field Office and Pompeys Pillar National Monument RMPs EIS fulfill the basic intent of NEPA, and encompass to the maximum extent possible the environmental and public involvement requirements of State and Federal laws, Executive Orders, and policies (e.g., Clean Water Act, Clean Air Act, Endangered Species Act, E.O.11990 Protection of Wetlands, etc.). EPA's primary interests are protection and restoration of water quality, riparian and aquatic habitats, groundwater quality, source water protection, wetlands and air quality. The EPA is particularly interested in seeing the RMPs and EIS disclose: -the existing conditions for all environmental resources and the specification of gaps in current knowledge; -the BLM's desired conditions to assure sustainability of environmental resources; - identification of areas not currently meeting desired conditions; -a specific set of goals and objectives to guide future actions toward achievement of the desired conditions; --Best Management Practices (BMPs) for water quality protection; protection of riparian areas and wetlands; reduced water quality, fisheries, and wildlife impacts from roads; and maintenance and restoration of watershed health to achieve water quality that fully supports beneficial uses of surface waters in cooperation with State EPA Total Maximum Daily Load (TMDL) development and implementation efforts; and -a commitment to monitoring for determining the extent to which the RMP will achieve goals and objectives and to assure that BMPs are effective.
1403	SC006	Noxious weed control.
1403	SC054	Control of non-native species to area, contamination of rivers, reclamation of use areas.
1403	SC099	Evaluate how motorized vehicles will impact vegetation and contribute to the spread of noxious weeds.

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
1403	SC099	<p>Assess the role of OHV activities in the spread of noxious weeds on BLM-managed lands in the planning area, and on neighboring landowners and farmers. Inventory BLM lands for sensitive plant species. What areas within the planning area have been inventoried and how does the agency plan to inventory the remaining lands? Include appropriate management actions to limit the spread of noxious weeds. Preventing the introduction and spread of noxious and invasive weeds should be a high priority for the BLM. Noxious weeds degrade wildlife habitat, reduce wildlife related expenditures, threaten sensitive and rare plant communities, cost farmers money in forage and crop losses, and cause soil erosion. The BLM needs to address noxious weeds in the RMP, and the agency should continue to be proactive in working to halt the introduction and spread of weeds. According to BLM statistics, noxious weeds covered 91,000 acres of public land in Montana in 1985, and 292,000 acres in 1995. This amounts to a 320 % increase in a mere 10 years! Roads and motorized routes are the most efficient means for the spread of invasive plants into the new areas. Treatment of weeds once they become established is costly and often ends with unsatisfactory results. The best and easiest way to stop weed infestations is to not let them start by restricting the vectors that weeds use to invade new areas. The Resource Management Plan must prepare for the future by continuing to implement policies that protect the land from noxious weed infestations. A minimal road and motorized trail system would make a considerable contribution to prevention efforts.</p>
1403	SC105	<p>One issue I have is the state of the wild horse ranges. I feel that the forest needs to be cleaned out in the Burnt Timber area, as it now stands it is a potential major fire hazard. I also feel that the range needs to be expanded with more water catchments put in. Weed control also needs to be addressed. Get a lot of volunteers to help clean out forest and to spray non-native weeds. Put in place water catchments to have a more spread out use of the range. Expand the range to the original size and possible add to it. This would open up more views of the wild horses and give them more spaces to roam and feed. Water is the most critical part of this plan. Also the cleaning of the forest would prevent major fire concerns as well of opening up more range land.</p>
1403	SC107	<p>The RMP should assess the impact of motorized recreation on the spread of noxious weeds. Preventing the spread of noxious weeds should be a high priority of the RMP.</p>
1403	SC109	<p>Evaluate how motorized vehicles will impact vegetation and contribute to the spread of noxious weeds.</p>

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
1403	SC109	<p>Assess the role of OHV activities in the spread of noxious weeds on BLM-managed lands in the planning area, and on neighboring landowners and farmers. Inventory BLM lands for sensitive plant species. What areas within the planning area have been inventoried and how does the agency plan to inventory the remaining lands? Include appropriate management actions to limit the spread of noxious weeds. Preventing the introduction and spread of noxious and invasive weeds should be a high priority for the BLM. Noxious weeds degrade wildlife habitat, reduce wildlife related expenditures, threaten sensitive and rare plant communities, cost farmers money in forage and crop losses, and cause soil erosion. The BLM needs to address noxious weeds in the RMP, and the agency should continue to be proactive in working to halt the introduction and spread of weeds. According to BLM statistics, noxious weeds covered 91,000 acres of public land in Montana in 1985, and 292,000 acres in 1995. This amounts to a 320 percent increase in a mere 10 years! Roads and motorized routes are the most efficient means for the spread of invasive plants into the new areas. Treatment of weeds once they become established is costly and often ends with unsatisfactory results. The best and easiest way to stop weed infestations is to not let them start by restricting the vectors that weeds use to invade new areas. The Resource Management Plan must prepare for the future by continuing to implement policies that protect the land from noxious weed infestations. A minimal road and motorized trail system would make a considerable contribution to prevention efforts.</p>
1403	SC125	<p>Threats to these plants and plant communities are off-road travel, introduction of weeds, cattle grazing. (This particular area may have been withdrawn from cattle grazing.) Some of the areas adjacent to the PMWHR are being proposed for annexation into the wild horse range, specifically Demijohn Flats. Grazing by horses may threaten these plants.</p>
1403	SC125	<p>Control of weeds in the South Pryor Desert is imperative. Of special concern are Russian thistle along the roads, Russian olive and tamarisk in riparian areas, cheat grass and halogeton that is now spreading beyond the roads in the lower portion of the PMWHR. The Gyp Springs site is a good example of how weedy species have taken over in the past five years.</p>
1460	SC001	<p>BLM has jurisdiction over some lands that are in the vicinity of houses built in the wildland urban interface. In order to reduce the risk of exposure to fire, management of these lands needs to prohibit all activities which would spark a fire event in the vicinity of the WUI. Prohibit campfires and motor vehicles and other internal combustion engines from administered lands adjacent to WUIs. Locate these uses in areas where fire suppression efforts are less costly. Strictly limiting the uses of lands adjacent to WUIs would help protect private property owners from loss due to fire and would reduce the expense to state and</p>

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Code

		federal budgets for fire suppression efforts.
1460	SC042	Positioning for climate change. Effects on communities. WUI areas.
1460	SC105	One issue I have is the state of the wild horse ranges. I feel that the forest needs to be cleaned out in the Burnt Timber area, as it now stands it is a potential major fire hazard. I also feel that the range needs to be expanded with more water catchments put in. Weed control also needs to be addressed. Get a lot of volunteers to help clean out forest and to spray non-native weeds. Put in place water catchments to have a more spread out use of the range. Expand the range to the original size and possible add to it. This would open up more views of the wild horses and give them more spaces to roam and feed. Water is the most critical part of this plan. Also the cleaning of the forest would prevent major fire concerns as well of opening up more range land.
1460	SC107	Expansion of housing developments adjacent or within BLM lands is increasing. The RMP should develop guidelines for acquiring inholdings and educating adjacent private property owners on fire suppression and other issues that might arise living adjacent to public land. Taxpayers should not have to pay the cost of fire fighting on private property.
1460	SC125	There needs to be an interagency plan for management of wildfires in the Pryors. Such plan would emphasize rehabilitation post fire.
1470	SC008	I would like to see the wild horses and their areas left alone. 4x4 access to see them is important to people such as myself, i.e., elderly, and not able to walk very far. The wild horses are an integral part of Montana and its tourism. People from all over the world and of all walks of life come to see these horses--spend their money! We only have 1 wild horse range in Montana. I believe it is important to keep them there and in their wild state. I would also like to see a mountain lion study done on the Pryors--their effect on the population--mountain lions are a more natural population control than that horrendous PZP. A study done with a halt to mountain lion hunting while it is being conducted.
1470	SC011	Pryor Mountain wild horse herd and habitat.
1470	SC015	Wild horses--proper husbandry, management, and care using scientific principles and methods.
1470	SC016	Wild horse and burros and the Pryor herd.
1470	SC021	Promote use of land so herd can sustain larger numbers. In my opinion the herd is managed at such a small population it is in danger; physically and genetically.

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
1470	SC027	My main concern is that the Pryor Mountain horses be protected and preserved with sustainable and genetically viable populations. Stop any roundups or removals. Cancel grazing allotments and logging and oil drilling. Buy up permit and more land. Allow more wild horses to remain on the Pryor Mountain HMA and increase the acreage allowed for them. Remove cattle and/or sheep and stop logging or oil drilling and development.
1470	SC028	The Wild Horse Range has large areas of highly erodible soils because of the steep, poorly vegetated slopes. Several rare plants occur in this area. Special management of ORV use and horse trampling is needed in order to protect the biological values of this area. Southern toeslopes of the Pryor Range and small included valleys harbor populations of rare plants and endemic plant communities. This area should be considered for special designation.
1470	SC029	I am concerned about human interference in the lives of the mustangs.
1470	SC029	I would like to see the stoppage of the use of PZP. I would want horses ten years and older to remain on the range. Their expertise and little forage are to be thought upon.
1470	SC031	All issues are very important; however we are mostly interested in the Pryor Mountain Herd management and the horses in the HMA.
1470	SC037	Keeping the horse herd down to keep and protect the grasslands. When my father made arrangements with BLM, the proposal was that there were not to be more than 90-120 head at any one time. Protect the reservoir.
1470	SC038	Wild horse management.
1470	SC039	As far as I am concerned, nature takes care of itself without human intervention. The herds have been almost destroyed beyond existence now. Why intervene wild territory. Leave things natural. Leave water available to these herds and control population by (if needed) sterilization injection. Leave it all natural for people to see.
1470	SC040	Ensure that the Pryor Mountain wild horses be allowed to range freely and be protected from human intervention and harassment. Eliminate cruel and dangerous roundups, bait trapping and darting. Expand grazing range for the Pryor wild horses. Allow natural forces to control numbers. We have had the privilege of observing these beautiful horses and hope to in the future. It is most disturbing to think of them in pens awaiting an uncertain future (I have seen that horrifying spectacle as well.) Too often bureaucratic policies serve special interests and not the welfare of the intended beneficiaries.

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
1470	SC043	Proper care and management of wild horses and burros. Ending roundups. Make sure horses that are rounded up don't go to slaughter. End helicopter roundups. Use fertility control to control population of wild horses. Maintain viable amount of horses for breeding. Carefully consider the contractors that are used with more investigation into practices if roundups are called for. Get more of general public feelings about wild horse management; not just the opinion of ranchers.
1470	SC048	Dramatic improvement in the range [if grazing leases retired], particularly the range of important riparian areas. The recovery could be so dramatic, you might stop spending millions on wild horses roundups with 30,000 managed on leased property.
1470	SC055	Wild horses.
1470	SC093	The wild horses are being squeezed from both sides-- environmentalists want to eliminate them, and those that exploit our public lands want to eliminate them.
1470	SC105	One issue I have is the state of the wild horse ranges. I feel that the forest needs to be cleaned out in the Burnt Timber area, as it now stands it is a potential major fire hazard. I also feel that the range needs to be expanded with more water catchments put in. Weed control also needs to be addressed. Get a lot of volunteers to help clean out forest and to spray non-native weeds. Put in place water catchments to have a more spread out use of the range. Expand the range to the original size and possible add to it. This would open up more views of the wild horses and give them more spaces to roam and feed. Water is the most critical part of this plan. Also the cleaning of the forest would prevent major fire concerns as well of opening up more range land.
1470	SC106	Wild horse and wildlife protect and responsible viewing opportunities. Special status species protection. Livestock grazing. Water and air quality issues. OHV travel. Cultural tourism.
1470	SC106	An analysis of compensatory reproduction in areas where ungulate populations are dramatically reduced. A discussion of the criteria used to arrive at population targets for wild horses, wildlife and livestock, i.e., the establishment of AUMs for each.
1470	SC107	The RMP should maintain the existing size of the Pryor Mountain Wild Horse Range. In managing the wild horses, the health of the range and other wildlife should be considered. The herd size should be maintained at a level that will protect the range and other resources. Consider working with the Crow Tribe to set up a non-adjacent satellite herd to maintain the genetic viability of the herd. If culled horses cannot be adopted, consider other uses for the animals including slaughter or euthanasia.

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
1500	SC054	Control of non-native species to area, contamination of rivers, reclamation of use areas.
1500	SC097	I guess I'd favor a lot of irrigation canals might be used and possible using some dam usage. I think of how great the Ft. Peck dam has been. We know much of our dry land needs to the care of extra water. Areas may be used to store water like up around Wheat Basin, Rapelje, Molt area for much of Billings. As a reservoir is built the canal may be used for irrigation.
1500	SC099	Develop and promote alternatives that protect the quality of water in the planning area.
1500	SC099	Where possible, look for creative ways to keep the water cleaner and create nesting habitat for birds and other wildlife near reservoirs. Where possible pump and pipe water out of reservoirs and utilize water tanks.
1500	SC106	Wild horse and wildlife protect and responsible viewing opportunities. Special status species protection. Livestock grazing. Water and air quality issues. OHV travel. Cultural tourism.
1500	SC115	Oil and gas drilling and watershed setbacks. We need a 1/2 mile setback on all oil and gas drilling from rivers/streams and their tributaries.

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
1500	SC056	<p>The Environmental Protection Agency (EPA), Region 8, Montana Office has reviewed the May 15, 2008 Notice of Intent to prepare a Resource Management Plan (RMP) for the Bureau of Land Management (BLM) Billings Field Office and Pompeys Pillar National Monument and an associated Environmental Impact Statement (EIS). The EPA reviews EIS's accordance with its responsibilities under the National Environmental Policy Act (NEP A) and Section 309 of the Clean' Air Act. Section 309 of the Clean Air Act directs EPA to review and comment in writing on the environmental impacts of any major Federal agency action. EPA's draft EIS comments will include a rating of both the environmental impact of the proposed action and the adequacy of analysis and disclosure in the NEPA document. We are enclosing a brief summary that explains EPA's DEIS rating' system. It is EPA's expectation that the Billings Field Office and Pompeys Pillar National Monument RMPs EIS fulfill the basic intent of NEPA, and encompass to the maximum extent possible the environmental and public involvement requirements of State and Federal laws, Executive Orders, and policies (e.g., Clean Water Act, Clean Air Act, Endangered Species Act, E.O.11990 Protection of Wetlands, etc.). EPA's primary interests are protection and restoration of water quality, riparian and aquatic habitats, groundwater quality, source water protection, wetlands and air quality. The EPA is particularly interested in seeing the RMPs and EIS disclose: -the existing conditions for all environmental resources and the specification of gaps in current knowledge; -the BLM's desired conditions to assure sustainability of environmental resources; -identification of areas not currently meeting desired conditions; -a specific set of goals and objectives to guide future actions toward achievement of the desired conditions; --Best Management Practices (BMPs) for water quality protection; protection of riparian areas and wetlands; reduced water quality, fisheries, and wildlife impacts from roads; and maintenance and restoration of watershed health to achieve water quality that fully supports beneficial uses of surface waters in cooperation with State EPA Total Maximum Daily Load (TMDL) development and implementation efforts; and -a commitment to monitoring for determining the extent to which the RMP will achieve goals and objectives and to assure that BMPs are effective.</p>
1500	SC109	Develop and promote alternatives that protect the quality of water in the planning area.
1500	SC109	Where possible, look for creative ways to keep the water cleaner and create nesting habitat for birds and other wildlife near reservoirs. Where possible pump and pipe water out of reservoirs and utilize water tanks.
2000	SC005	I feel that continued development of industrial and commercial activities should be allowed on public lands.

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
2000	SC026	Keep open for the public.
2000	SC054	Control of non-native species to area, contamination of rivers, reclamation of use areas.
2000	SC093	Commercial use needs to be regulated by fair lease fees (meaning raise them to nearly what private fees are) and significant permit fees, or do away with leases entirely and leave the public lands public.
2000	SC101	In fact, internal agency bias, bent far left, overrides grass roots input and leads to lock up of most of our commodity resources.. Recreation and wildlife are the winners. Consider what happened in the case of the Upper Missouri Monument. What a scam.
2000	SC120	Over use by certain users. Reduce AUMs, ATVs, and put serious thought into the areas for drilling-some areas should not have gas/oil activities at all and others need strict oversight. Gas and oil are not going to disappear so take your time deciding. Public land resources would have fewer weeds, more diverse vegetation to benefit wildlife and the biodiversity needed for a healthy environment.
2050	SC002	Over population of trees, harvest some timber. Over population of bugs (beetles), harvest some timber. Fire hazard with so many trees, harvest some timber. Harvest some timber so while you are in these areas, a person can see more than one foot ahead or maybe see wildlife. The result would be a healthier ecosystem, more room for recreation, more available resources for infrastructure.
2050	SC097	I definitely feel that anywhere there is some dead timber to harvest it an thinning of timber, where roads are feasible to do it, great. In regards to timber, sometimes horses may be used to pull logs.
2050	SC105	One issue I have is the state of the wild horse ranges. I feel that the forest needs to be cleaned out in the Burnt Timber area, as it now stands it is a potential major fire hazard. I also feel that the range needs to be expanded with more water catchments put in. Weed control also needs to be addressed. Get a lot of volunteers to help clean out forest and to spray non-native weeds. Put in place water catchments to have a more spread out use of the range. Expand the range to the original size and possible add to it. This would open up more views of the wild horses and give them more spaces to roam and feed. Water is the most critical part of this plan. Also the cleaning of the forest would prevent major fire concerns as well of opening up more range land.
2100	SC028	BLM policies should discourage residential development in the foothills of the Beartooth and gas development and mining on the fringe of the Pryor Range. In short, the Northern Bighorn Basin has many significant biological values that should be protected.

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
2100	SC028	I believe that the management plan should provide direction that will protect biological and recreational values (hunting) by discouraging residential development on private wildlands adjacent to public land.
2100	SC101	BLM must institute a practice that formally notes on master title plats or in local title documents the effect of resource allocation decision on public and private lands. These actions are title impacting processes and therefore must be carried on the records as are all other processes of law that impact title.
2100	SC107	Expansion of housing developments adjacent or within BLM lands is increasing. The RMP should develop guidelines for acquiring inholdings and educating adjacent private property owners on fire suppression and other issues that might arise living adjacent to public land. Taxpayers should not have to pay the cost of fire fighting on private property.
2100	SC108	One issue is that your materials at the scoping meeting do not map where BLM owns severed minerals. The split estate flyer primarily addressed the current coal bed methane imbroglio. There should be information on procedures for other leasable and locatable minerals. Balm has the potential to affect more acreage subsurface than it owns surface in this area. BLM should also indicate changes in its land and mineral ownership between 1984 and 2008 or 9. Outstanding mineral leases should also be indicated. This should have been information presented at the scoping meetings. It's hard to form an opinion without adequate information.
2100	SC123	Give high priority to the acquisition by purchase or exchange for private properties of important historical and cultural importance to include the following: Weatherman Draw surrounding areas of access, Pryor Mountain areas of significant cultural resources.
2101	SC002	Hunting access.
2101	SC012	What access will be provided to the public? Any future development?
2101	SC013	Continue access to BLM. That BLM trades would not result in the closing of access to privately held lands.
2101	SC020	Access to public lands--signing of public lands to identify these lands.
2101	SC030	Support hunting, fishing, and hiking access (limited mountain biking).
2101	SC034	America needs its resources from coast to coast. Let's move to intelligent accelerated development. Multiple use of land benefits all humanity. Creates jobs, creates access, creates national wealth and strength. It is good for all.
2101	SC041	Make sure that public land use is accessible to all groups of the public for multi-use recreation. It also needs consideration for economic impacts so it is not a taxpayer burden.

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
2101	SC042	Protection of historic and prehistoric resources and public access to these areas.
2101	SC050	We are concerned about losing public access to significant prehistoric resources including, but not limited to, Weatherman Draw (especially in the Pryor Mountains).
2101	SC051	Very little respect by the public for the land and for the lessee. Little regard for boundary between public and private land. Trash left everywhere, refusal to say on roads, especially if wet, fences cut, gates left open, etc.
2101	SC095	Access with 4-wheelers. Hunting, fishing and trapping. Private property blocking public access. Uphold laws that give us access to public lands. Fix up ATV roads and fishing and hunting access areas. Fixing up ATV roads might keep people from leaving main trail. Tougher fines for littering. Fines for not closing gates.
2101	SC096	Over the last four years, TSATV has been actively involved in US Forest Service Travel Management Plans for a number of areas, including actively in the following: -Beartooth and Ashland Ranger Districts of the Custer National Forest -Belt Creek, Judith, Musselshell and White Sulphur Springs Ranger Districts of the Lewis and Clark National Forest. Unfortunately, TSATV has not spent near enough time on BLM issues, except for the Ah Nei affair a few years ago. In the future, we would like to be more involved and are open to such things as volunteerism, maintenance, education, safety and other related topics. Our approach on the Forest Service Plans was to facilitate more openness and work on the topics just mentioned. Of particular importance was the Pryor Mountain area, including access through private land, the Crow Reservation and BLM land. Loop trails coming and going off BLM land is very important. TSATV members include the Pryors Mountain area, the area between Belfry, MT, and Warren, MT, and the area north of Lovell, WY, as very key access areas. We want to keep these areas open for OHV activities and would be willing to work with the BLM achieve this objective.
2101	SC127	I am concerned about all closures and land use restrictions on all public lands.
2102	SC009	Establish realistic lease and sale values on nonaccessible public land. If sold buy public accessible land for public use.
2102	SC009	Public land surrounded by private land has always been a problem. Ways to sell or lease public land at realistic values should be explored (and the use of sale dollars should be used to purchase private land accessible to the public).
2102	SC019	I would be interested in purchasing the two landlocked parcels of BLM land on our ranch. I think the isolated parcels of land should be offered to adjoining landowners and the money raised used to purchase key access parcels for the general public.

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
2102	SC092	It is especially tragic that vast sums of money have spent on planning on land which has little value to most people. It would be far better if the land that is unprofitable to the people of the United States (i.e., most BLM land) be passed into private ownership. The mineral estate, which is profitable, should be retained.
2102	SC099	Identify priority areas for future land acquisition or land exchanges so that when opportunities from willing sellers present themselves, it is clear about whether to put the time, effort and expense into negotiating a sale or trade. Land sales or trades should be pursued when the property expands wildlife habitat, contains historic or cultural sites, has scenic values or prevents development which is incompatible with the adjoining public lands.
2102	SC109	Identify priority areas for future land acquisition or land exchanges so that when opportunities from willing sellers present themselves, it is clear about whether to put the time, effort and expense into negotiating a sale or trade. Land sales or trades should be pursued when the property expands wildlife habitat, contains historic or cultural sites, has scenic values or prevents development which is incompatible with the adjoining public lands.
2103	SC099	Are any pipelines, electrical transmission lines, or energy corridors proposed for the planning area? As with other energy projects, the RMP should provide guidance relative to the routing and impacts of such energy corridors.
2103	SC101	As an example, the state director and Montana governor signed a ROD in the 1980s designating ROW corridors across Montana. Those corridors were coordinated regionally into the Dakotas, Wyoming, Idaho, Washington and Oregon. The corridors were mapped and filed for the record with the state, BLM and USFS. Yet, when the latest corridor planning began, no record of the 80s work could be found. I have copies of the earlier work, but no one in the agencies will review it.
2103	SC103	Right of way concerns through BLM for RMT Corporation are very confusing.
2103	SC109	Are any pipelines, electrical transmission lines, or energy corridors proposed for the planning area? As with other energy projects, the RMP should provide guidance relative to the routing and impacts of such energy corridors.
2150	SC004	Prairie dogs are varmints, rodents and do destroy vegetation. When a BLM lease has adjoining private property and poisons the dog towns on his private land that adjoins BLM which also has prairie dogs on it, the lessee should be able to poison the prairie dogs on the BLM property. Money and poison should be available from the BLM to the lessee.

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
2150	SC027	My main concern is that the Pryor Mountain horses be protected and preserved with sustainable and genetically viable populations. Stop any roundups or removals. Cancel grazing allotments and logging and oil drilling. Buy up permit and more land. Allow more wild horses to remain on the Pryor Mountain HMA and increase the acreage allowed for them. Remove cattle and/or sheep and stop logging or oil drilling and development.
2150	SC030	Support grazing if it mimics wild grazing patterns (i.e., Allan Savery's rangeland management practices
2150	SC030	Strict guidelines on grazing leases.
2150	SC038	Livestock grazing management.
2150	SC048	Too much emphasis on grazing leases, which is historically appropriate, but not now. Keep the public land from cattle degradation. The BLM is biased towards ranchers. Stop all grazing leases on BLM managed land. Retire those leases.
2150	SC094	Range management should be addressed in the RMP and the guidelines and indicators for healthy range conditions should be described in the new RMP. How will range conditions be monitored, and when corrections are needed, and how will they be implemented.
2150	SC095	People who lease grazing land should be issued signs that say "please close gate" or "please leave gate open" to be put up at lessees discretion.
2150	SC099	Range management should be addressed in the RMP, or at least a synopsis of the watershed plans. The synopsis should describe the guidelines and indicators for healthy range conditions and the desired natural community. Further, the summary should describe the current condition of ranges and riparian areas and where improvements are needed, provide a plan that describes the steps which will be taken, and the benchmarks to determine whether the range and riparian areas are moving to a desired condition. Finally it should describe how range conditions be monitored.
2150	SC100	I believe working with lessees of BLM to enhance the environment/water development/fencing/weed control, would be huge for grazing/wildlife, all outdoor activities. Also changing traditional uses would be very detrimental to the health of the land.

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
2150	SC102	I am one of the many and the member of several organizations who want all the original herd areas allocated in the Wild Horse and Burro Act to be restored to the animals it was legally meant to protect, and all grazing permits revoked, and the 30,000 wild horses currently in holding pens, returned to those restored areas. We need intelligent management, not killing 30,000 head of horses you are mandated to protect. I have one message for the cattle industry: "Get the hell off my land, and take your dammed cattle with you!" The same "request" applies to the Pryor Wild Horse Range. We want the management areas expanded to once again include the original herd areas. No more "gatherings" under the pretense of "range management." No more adoptions. Wild horses don't want to live in some pen in the backyard and be our "friend." They have their own lives, their own families, leave them there.
2150	SC106	Wild horses and wildlife - protect and responsible viewing opportunities. Special status species protection. Livestock grazing. Water and air quality issues. OHV travel. Cultural tourism.
2150	SC106	Expansion of the Pryor Mountain Wild Horse Range. Termination of lethal predator and "pest" control activities. Restriction on OH travel and hunting. Voluntary livestock grazing permit buy-outs. Great protect of a significant wild horse herd. A full complement of faunal species for healthy ecosystem functioning and increase natural regulation of populations of wildlife. Increased public understanding and appreciation for historic and cultural resources.
2150	SC107	The RMP should set guidelines for range management, indicators for healthy range conditions, monitoring, and remedial actions if necessary.
2150	SC108	BLM has land tracts that are not currently economic with the AUMs allowed. These tracts have not been readjusted for 40 years. The suspended AUMs have disappeared in the interval. It would be interesting to know how that was managed and whether BLM ever intends to revisit the suspended AUMs.
2150	SC117	Range management should be addressed in the RMP and the guidelines and indicators for healthy range conditions should be described in the new RMP. How will range conditions be monitored, and when corrections are needed, and how will they be implemented.
2150	SC120	Over use by certain users. Reduce AUMs, ATVs, and put serious thought into the areas for drilling-some areas should not have gas/oil activities at all and others need strict oversight. Gas and oil are not going to disappear so take your time deciding. Public land resources would have fewer weeds, more diverse vegetation to benefit wildlife and the biodiversity needed for a healthy environment.

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
2150	SC056	The RMPs and EIS should also ensure that the cumulative impacts from management activities will meet all applicable environmental criteria in Montana. EPA will review proposed land management actions and alternatives, including energy development, grazing, transportation systems, mining, and off-highway vehicle management, for their potential to adversely affect environmental resources. Enclosed are EPA's more detailed scoping comments to assist in addressing NEPA requirements, and environmental and public involvement requirements of State and Federal laws, regulations and policies, and issues that will assist in the preparation of the EIS.
2150	SC109	Range management should be addressed in the RMP, or at least a synopsis of the watershed plans. The synopsis should describe the guidelines and indicators for healthy conditions and the desired natural community. Further, the summary should describe the current condition of ranges and riparian areas and where improvements are needed, provide a plan that describes the steps which will be taken, and the benchmarks to determine whether the range and riparian areas are moving to a desired condition. Finally it should describe how range conditions be monitored.
2150	SC125	Threats to these plants and plant communities are off-road travel, introduction of weeds, cattle grazing. (This particular area may have been withdrawn from cattle grazing.) Some of the areas adjacent to the PMWHR are being proposed for annexation into the wild horse range, specifically Demijohn Flats. Grazing by horses may threaten these plants.
2150	SC126	Nora Taylor is already working through the RMP process to consider protection for the special and rare plants found in the South Pryor Desert. The focus is on the BLM lands to the east of Crooked Creek Road and between Penny Peak to the north and Gyp Springs to the south. Larry was helpful to explain grazing in the targeted area. The allotments are not used because of the lack of water. I now understand that Jared has responsibility for those grazing allotments.
2200	SC028	BLM policies should discourage residential development in the foothills of the Beartooth and gas development and mining on the fringe of the Pryor Range. In short, the Northern Bighorn Basin has many significant biological values that should be protected.
2200	SC030	Fossil fuel development.
2200	SC034	Multiple use is critical. Especially oil, gas, mineral extraction.
2200	SC092	It is especially tragic that vast sums of money have spent on planning on land which has little value to most people. It would be far better if the land that is unprofitable to the people of the United States (i.e., most BLM land) be passed into private ownership. The mineral estate, which is profitable, should be retained.

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
2200	SC097	I also feel gas, oil coal, and minerals should be put to use. I don't feel we should rely on foreign oil. American can safely use nuclear power. France has done a lot of that.
2200	SC099	Multiple use also should not be construed to mean that extractive uses are preferred over other uses. The BLM cannot authorize a particular use based purely on the contribution of that use to the economy.
2200	SC099	Identify existing mining claims and areas where concentrations of commercial grade minerals exist.
2200	SC101	Focus on economic recovery and energy support.
2200	SC107	The RMP should explain how areas will be determined appropriate for oil and gas and coal development. The RMP should also explain what stipulations will be placed on leases to limit damage and restore the area to a more natural state. The RMP should explain how the lease holders will be required to work with surface owners to minimize surface damages.
2200	SC108	One issue is that your materials at the scoping meeting do not map where BLM owns severed minerals. The split estate flyer primarily addressed the current coal bed methane imbroglio. There should be information on procedures for other leasable and locatable minerals. Balm has the potential to affect more acreage subsurface than it owns surface in this area. BLM should also indicate changes in its land and mineral ownership between 1984 and 2008 or 9. Outstanding mineral leases should also be indicated. This should have been information presented at the scoping meetings. It's hard to form an opinion without adequate information.
2200	SC123	Strengthen all stipulations for oil, gas, coal, and coal bed methane leases to protect cultural and historic resources in exploration and mineral development areas.
2200	SC056	The RMPs and EIS should also ensure that the cumulative impacts from management activities will meet all applicable environmental criteria in Montana. EPA will review proposed land management actions and alternatives, including energy development, grazing, transportation systems, mining, and off-highway vehicle management, for their potential to adversely affect environmental resources. Enclosed are EPA's more detailed scoping comments to assist in addressing NEP A requirements, and environmental and public involvement requirements of State and Federal laws, regulations and policies, and issues that will assist in the preparation of the EIS.
2200	SC109	Multiple use also should not be construed to mean that extractive uses are preferred over other uses. The BLM cannot authorize a particular use based purely on the contribution of that use to the economy.
2200	SC109	Identify existing mining claims and areas where concentrations of commercial grade minerals exist.

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
2210	SC027	My main concern is that the Pryor Mountain horses be protected and preserved with sustainable and genetically viable populations. Stop any roundups or removals. Cancel grazing allotments and logging and oil drilling. Buy up permit and more land. Allow more wild horses to remain on the Pryor Mountain HMA and increase the acreage allowed for them. Remove cattle and/or sheep and stop logging or oil drilling and development.
2210	SC028	These populations and communities can be protected by restricting off-road vehicle use as well as oil and gas development in much but not all of the BLM land in the area.
2210	SC053	The current boom in oil and gas development and the attendant management challenges make it critical that the BLM use the best available tools to minimize impacts to valuable public land resources such as wildlife habitat, clean air and water, cultural resources, and lands with wilderness character.
2210	SC053	This brief provides a cutting-edge, scientific framework which the agency can use to identify habitat and wildlife impacts that must be analyzed in planning. It demonstrates the potential impacts on wildlife of habitat fragmentation from oil and gas development at various well-pad densities, and offers methodologies to assist the BLM to fulfill its FLPMA and NEPA responsibilities to analyze the direct, indirect, and cumulative impacts on wildlife of proposed oil and gas development in the agency's resource management plans.
2210	SC053	Conduct a spatial analysis of the direct, indirect, and cumulative impacts on wildlife of all proposed oil and gas development alternatives.
2210	SC053	Assess the habitat fragmentation effects of oil and gas development for maximum well-pad development densities.
2210	SC053	Include oil and gas field development options that leave areas of threatened habitats undeveloped.
2210	SC053	Use GIS technology to evaluate the impacts of oil and gas development on wildlife.
2210	SC094	The RMP should explain how the public will be informed about the leasing of BLM land for oil and gas drilling. It should also explain how the BLM will determine whether an area is appropriate for oil and gas drilling. Finally, if it is determined that an area is appropriate to lease for oil and gas drilling, the RMP should explain what kind of stipulations will be placed on leases to limit the damage and restore the area to a more natural setting.

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
2210	SC098	The RMP should explain how the public will be informed about the leasing of BLM land for oil and gas drilling. It should also explain how the BLM will determine whether an area is appropriate for oil and gas drilling. Finally, if it is determined that an area is appropriate to lease for oil and gas drilling, the RMP should explain what kind of stipulations will be placed on leases to limit the damage and restore the area to a more natural setting.
2210	SC099	If the BLM has not completed an inventory of historic sites, how will the agency determine whether an area is appropriate to lease for oil and gas drilling?
2210	SC099	The RMP should explain how the public will be informed about the leasing of BLM land for oil and gas drilling. If it is determined that an area is appropriate to lease for oil and gas drilling, what kind of stipulations will be placed on leases to limit the damage and restore the area to a more natural setting? The plan should explain how the agency will determine what areas are appropriate for oil and gas exploration and drilling activities.
2210	SC110	Oil and gas should be part of the management direction of BLM not 100% of it. Oil and gas should not be the sole use for public land.
2210	SC115	Oil and gas drilling and watershed setbacks. We need a 1/2 mile setback on all oil and gas drilling from rivers/streams and their tributaries.
2210	SC116	The current boom in oil and gas development and the attendant management challenges make it critical that the BLM use the best available tools to minimize impacts to valuable public land resources such as wildlife habitat, clean air and water, cultural resources, and lands with wilderness character.
2210	SC117	The RMP should explain how the public will be informed about the leasing of BLM land for oil and gas drilling. It should also explain how the BLM will determine whether an area is appropriate for oil and gas drilling. Finally, if it is determined that an area is appropriate to lease for oil and gas drilling the RMP should explain what kind of stipulations will be placed on leases to limit the damage and restore the area to a more natural setting.
2210	SC120	Over use by certain users. Reduce AUMs, ATVs, and put serious thought into the areas for drilling-some areas should not have gas/oil activities at all and others need strict oversight. Gas and oil are not going to disappear so take your time deciding. Public land resources would have fewer weeds, more diverse vegetation to benefit wildlife and the biodiversity needed for a healthy environment.
2210	SC109	If the BLM has not completed an inventory of historic sites, how will the agency determine whether an area is appropriate to lease for oil and gas drilling?

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
2210	SC109	The RMP should explain how the public will be informed about the leasing of BLM land for oil and gas drilling. If it is determined that an area is appropriate to lease for oil and gas drilling, what kind of stipulations will be placed on leases to limit the damage and restore the area to a more natural setting? The plan should explain how the agency will determine what areas are appropriate for oil and gas exploration and drilling activities.
2210	SC128	BLM should address the recoverable oil and gas resource potential and how that potential affects domestic supply and demand. BLM should analyze and define the impact that various stipulations cause on the access of recoverable reserves.
2210	SC128	Prior to implementing oil and gas stipulations, BLM should conduct a complete cost/benefit analysis of the stipulation, conduct a thorough data review on the proposed stipulations, and adapt a monitoring program tracking the effectiveness of the stipulations.
2210	SC129	MPA believes that exploration and production of vital oil and gas minerals on all public lands that are not national park or designated wilderness is important in developing domestic energy supplies and is good public policy. Further, on public lands that are designated multiple use, oil and gas development should be encouraged and allowed.
2210	SC129	MPA urges the BLM to allow exploration and production in the Billings Resource Management Plan consistent with out stated policy. This plan should be developed with a minimum of restrictions necessary to encourage reasonable and responsible development of the oil and gas resources critical to America's energy supply.

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
2210	SC129	We are concerned that there appears to have developed a degree of misunderstanding between BLM and the Montana Department of Fish, Wildlife and Parks regarding critical habitat for sage grouse.it became apparent that there is disagreement between the BLM and the state on what exactly critical habitat areas are. The MPA is concerned and requests that the designation of any habitat as critical, crucial or core be clearly defined and agreed upon. Similarly, a common definition for the quality and importance of habitat is necessary to avoid confusion and delay. MPA is extremely concerned about recommended stipulations to protect sage grouse, including: one well per 500 acres, a one-mile NSO and a four-mile timing restriction from active leks, no development in core or critical areas. Clearly, these recommendations will dramatically affect mineral resource development. MPA believes the current stipulations adequately protect grouse. For all but the most critical of sage grouse habitat, the current 1/4 mile NSO and 2-mile timing restrictions are the correct stipulations. These stipulations are supported by many published and peer reviewed scientific studies. One prominent example is a study by biologist Renee Taylor, of Taylor Environmental, Casper, WY, that members of MPA believe deserves consideration as BLM develops stipulations regarding sage grouse habitat. While sage grouse and other species' habitats have become the focus of resource agency actions, the MPA is concerned with an apparent and disturbing trendto file protest documents covering a wide range of wildlife. These protests often take the form of Requests for Restricted Development to address perceived and unsubstantiated threats to wildlife species that cause delay and result in time available for resource development that is unrealistic and unworkable. For example, an analysis of the Rawlins RMP by the Petroleum Association of Wyoming left a new development window of less than 90 days. That 90-day window, oddly enough, falls during hunting season. Wildlife stipulations need to allow reasonable access.
2211	SC091	Want to see flexibility in RMP about coal mining, e.g., highwall moving--enter seam from outcrop, requirement for maximum recovery, want to make sure we don't start the production and a decision would change in several years with a ROD.
2211	SC101	Declaration of unsuitability for public lands/resources thus alienating them and associated non-public interest from economic contribution. Isn't such a taking of non-public values so effected?

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
2211	SC121	Signal Peak Energy has permitted and is developing a large scale underground coal mine in the Bull Mountains. Signal, through its predecessor Bull Mountain Coal Properties, has applied for a Federal coal lease related to its operation. Signal's efforts over the past two decades to develop this mine relied on the coal resource decision made in September 1984 Record of Decision on the RMP. In addition, the 1991 decision to complete a land exchange between the BLM and Meridian Minerals also indicated support for future leasing for underground mining of Federal coal. In light of these past BLM decisions and Signal's willingness to spend substantial funds and energy to move toward development, Signal strongly supports the continues determination to make the total Bull Mountains coal field reserves available for leasing for underground mining.
2211	SC124	In light of the rich history of coal mining in Musselshell County, and the current economic opportunities as a result of the developing underground Bull Mountains Coal Mine No.1, the County Commissioners of Musselshell County believe it is imperative that the BLM give serious consideration to the development of future underground and surface coal mining on federally managed lands in Musselshell County. Many of these federally managed parcels contain economically recoverable deposits of coal. Most of these deposits can be developed by underground mining methods, but some BLM lands contain coal deposits that can and should be developed by surface mining methods. It is important the RMP process include opportunities for these lands to be developed for coal mining. Therefore, we strongly encourage the BLM to include both surface and coal mining opportunities as part of the BLM's BiFO RMP process.
2215	SC030	Support wind development.
2215	SC099	Are any BLM lands leased out for wind farms? Through the RMP process, some criterion should be developed which considers the appropriateness and compatibility of wind farms and other large industrial projects when situated in or adjacent to special management lands or lands with high wildlife values.
2215	SC109	Are any BLM lands leased out for wind farms? Through the RMP process, some criterion should be developed which considers the appropriateness and compatibility of wind farms and other large industrial projects when situated in or adjacent to special management lands or lands with high wildlife values.
2250	SC002	Over population of trees, harvest some timber. Over population of bugs (beetles), harvest some timber. Fire hazard with so many trees, harvest some timber. Harvest some timber so while you are in these areas, a person can see more than one foot ahead or maybe see wildlife. The result would be a healthier ecosystem, more room to recreation, more available resources for infrastructure.
2250	SC018	Maintain history and make it available to public and tourist. Educate the public about lands around us.

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
2250	SC020	With increase population in the Billings area and the increase in fuel prices, more people will be recreating close to home--therefore more people will be impacting public lands closer to Billings.
2250	SC028	I believe that the management plan should provide direction that will protect biological and recreational values (hunting) by discouraging residential development on private wildlands adjacent to public land.
2250	SC038	Recreation.
2250	SC041	Make sure that public land use is accessible to all groups of the public for multi-use recreation. It also needs consideration for economic impacts so it is not a taxpayer burden.
2250	SC043	Develop recreational areas for wild horse viewing.
2250	SC093	Commercial recreation use should also be closely regulated with significant permit fees--it's not fair for a few businesses to make huge profits from our public lands.

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
2250	SC099	<p>What recreational opportunities will be provided for traditional hunters, hikers, or horseback riders seeking a more remote, primitive, quiet, and non-motorized experience? The evidence that motorized vehicle traffic conflicts with other uses is overwhelming. As levels of traffic rise, it becomes a dominant use, displacing traditional nonmotorized use. The DOI long ago recognized that adding off-road vehicle traffic subtracts from natural integrity, thereby displacing traditional backcountry visitors: "Any substantial ORV presence in a backcountry area tends to displace tranquility seeking visitors and preclude their further use of the area. " (DOI Final EIS, Departmental Implementation of EO 11644, 1978) This conclusion has been substantiated -repeatedly-- by recreational research: The 1994 Montana Trail Users Study found that 84% of equestrians and 89% of Montana hikers find off-road vehicles to be incompatible trail uses. Nearly three out of four Montanans (74%) who cross-country ski will avoid areas with snowmobile traffic. (Montana Trail Users Study, Institute for Tourism and Recreation Research, University of Montana, 1994). In a 1997 survey, two-thirds of Idaho residents oppose the use of motorized off-road vehicles such as ATVs and motorcycles in areas closed to cars and trucks. Seventy percent would support restrictions on the use of motorized vehicles off roads during hunting seasons in large geographic areas such as watersheds or entire game management units. (Access and Off-Road Vehicle Mgmt, Idaho Public Policy Survey, Scudder, 1997). A 1998 survey by the Montana Hunter Behavior Council found: " Widespread concern about the use of ATVs and their negative impact on the sport of hunting is evident throughout the survey findings ..." What measures will be taken to avoid user conflict? Conflicts between motorized and non-motorized users are best minimized by creating large blocks of land for motorized use and large blocks for non-motorized use. With the passage of the Multiple Use Sustained Yield Act it has long been recognized that some uses are incompatible with others and that over a larger landscape uses should be separated with some uses managed to a lesser extent than others. Areas and trails shall be located to minimize conflicts between off-road vehicle use and other existing or proposed recreational uses of the same or neighboring public lands ... (43 CFR § 8342). How will the new RMP, including OHV management and travel planning, comply with (43 CFR 8342.1 and 8342.2, codifying Executive Orders 11644 and 11989, that instruct BLM on OHV management?</p>
2250	SC099	<p>The award winning and highly annotated document by the Montana Chapter of the Wildlife Society on the effects of recreation on Rocky Mountain wildlife should also be considered and reviewed in the analysis.</p>

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
2250	SC099	Protected landscapes attract tourists who contribute to local economies. But the same features which attract tourists also serve as a magnet to attract and keep residents to live, work and conduct business in nearby communities. Their contribution to local economies and to the stability and well being of their communities is generally even greater than tourism. How will the analysis assess the economic benefits of protected landscapes? How will the analysis assess the boom and bust associated with extractive industry on local communities?
2250	SC099	The RMP should also identify opportunities for winter recreation such as providing public access to the backcountry for snowshoe walking, skiing, or wildlife viewing. Some creative options should be considered such as plowing roads to trailheads and using yurts or cabins for winter camping or as warming huts.
2250	SC106	Wild horse and wildlife protect and responsible viewing opportunities. Special status species protection. Livestock grazing. Water and air quality issues. OHV travel. Cultural tourism.
2250	SC119	Abuse of land-trash, driving off roads, dangerous shooting, shooting water tanks, cutting gates, fences. Foot traffic only, no motorized vehicles, better education of public on use of public lands, better respect for environment, better policing and control use of public land.

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
2250	SC109	<p>What recreational opportunities will be provided for traditional hunters, hikers, or horseback riders seeking a more remote, primitive, quiet, and non-motorized experience? The evidence that motorized vehicle traffic conflicts with other uses is overwhelming. As levels of traffic rise, it becomes a dominant use, displacing traditional nonmotorized use. The DOI long ago recognized that adding off-road vehicle traffic subtracts from natural integrity, thereby displacing traditional backcountry visitors: "Any substantial ORV presence in a backcountry area tends to displace tranquility seeking visitors and preclude their further use of the area. " (DOI Final EIS, Departmental Implementation of EO 11644, 1978) This conclusion has been substantiated -repeatedly-- by recreational research: The 1994 MT Trail Users Study found that 84% of equestrians and 89% of Montana hikers find off-road vehicles to be incompatible trail uses. Nearly three out of four Montanans (74%) who cross-country ski will avoid areas with snowmobile traffic. (MT Trail Users Study, ITRR, U of M, 1994). In a 1997 survey, two-thirds of Idaho residents oppose the use of motorized off-road vehicles such as ATVs and motorcycles in areas closed to cars and trucks. 70 % percent would support restrictions on the use of motorized vehicles off roads during hunting seasons in large geographic areas such as watersheds or entire game management units. (Access and Off-Road Vehicle Mgmt, Idaho Public Policy Survey, Scudder, 1997). A 1998 survey by the MT Hunter Behavior Council found: " Widespread concern about the use of ATVs and their negative impact on the sport of hunting is evident throughout the survey findings ..." What measures will be taken to avoid user conflict? Conflicts between motorized and non-motorized users are best minimized by creating large blocks of land for motorized use and large blocks for non-motorized use. With the passage of the Multiple Use Sustained Yield Act it has long been recognized that some uses are incompatible with others and that over a larger landscape uses should be separated with some uses managed to a lesser extent than others. Areas and trails shall be located to minimize conflicts between off-road vehicle use and other existing or proposed recreational uses of the same or neighboring public lands ... (43 CFR § 8342). How will the new RMP, including OHV management and travel planning, comply with the Federal Regulations (43 CFR 8342.1 and 8342.2, codifying Executive Orders 11644 and 11989, that instruct BLM on OHV management?</p>
2250	SC109	<p>The award winning and highly annotated document by the Montana Chapter of the Wildlife Society on the effects of recreation on Rocky Mountain wildlife should also be considered and reviewed in the analysis.</p>

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
2250	SC109	Protected landscapes attract tourists who contribute to local economies. But the same features which attract tourists also serve as a magnet to attract and keep residents to live, work and conduct business in nearby communities. Their contribution to local economies and to the stability and well being of their communities is generally even greater than tourism. How will the analysis assess the economic benefits of protected landscapes? How will the analysis assess the boom and bust associated with extractive industry on local communities?
2251	SC041	I believe that more public campgrounds could be developed in the south Pryors.
2255	SC030	Support hunting, fishing, and hiking access (limited mountain biking).
2255	SC095	Access with 4-wheelers. Hunting, fishing and trapping. Private property blocking public access. Uphold laws that give us access to public lands. Fix up ATV roads and fishing and hunting access areas. Fixing up ATV roads might keep people from leaving main trail. Tougher fines for littering. Fines for not closing gates.
2255	SC106	Expansion of the Pryor Mountain Wild Horse Range. Termination of lethal predator and "pest" control activities. Restriction on OH travel and hunting. Voluntary livestock grazing permit buy-outs. Great protect of a significant wild horse herd. A full complement of faunal species for healthy ecosystem functioning and increase natural regulation of populations of wildlife. Increased public understanding and appreciation for historic and cultural resources.
2300	SC041	The travel plans need to parallel the Forest Service plans on adjacent lands.
2300	SC094	The Pryor Mountain, Burnt Timber Canyon, and Big Horn Tack-on Wilderness Study Areas are adjacent to each other, separated only by primitive roads. All three of the WSAs were recommended by the BLM for Wilderness designation in 1991. To ensure they remain a viable option for consideration as wilderness, I ask you to identify and eliminate illegally created roads or other changes which might degrade the character of the WSAs.
2300	SC094	The Twin Coulee Wilderness Study Area, bordering the Forest Service managed Big Snowy WSA was NOT recommended for Wilderness designation by the BLM in 1991. Since then, the Forest Service has eliminated motorized vehicle use in most of the WSA improving its wilderness character. Therefore, please reevaluate the wilderness character of the Twin Coulee WSA and develop a plan to protect, restore and improve its wilderness values so that it is compatible with management of the Big Snowy WSA and can be recommended for Wilderness designation.
2300	SC098	Identify illegal roads or other changes in the Pryor Mountain, Burnt Timber Canyon, and Big Horn Tack-on Wilderness Study Areas to assure they remain viable for wilderness designation.

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
2300	SC099	The BLM must minimize conflicts between resources and thoughtfully consider how a particular resource use affects other resource values. Therefore, where incompatible uses exist, the BLM does have an obligation to provide a spectrum of opportunities that includes recreational opportunities for traditional hunters, hikers, or horseback riders seeking a more remote, primitive and quiet non-motorized trails should also be considered for mountain bikers outside of wilderness study areas and proposed wilderness.
2300	SC099	The Pryor Mountain, Burnt Timber Canyon, and Big Horn Tack-on Wilderness Study Areas are adjacent to each other, separated only by primitive roads. All three of the WSAs were recommended by the BLM for Wilderness designation in 1991. To ensure they remain a viable option for consideration as wilderness, please identify any illegally created roads or other changes which might diminish the wilderness character of the WSAs.
2300	SC099	The Twin Coulee Wilderness Study Area, bordering the Forest Service managed Big Snowy WSA was NOT recommended for Wilderness designation by the BLM in 1991. Since then, the Forest Service has eliminated motorized vehicle use in most of the WSA improving its wilderness character. Please reevaluate the wilderness character of the Twin Coulee WSA and develop a plan to protect, restore and improve its wilderness values so that it is compatible with management of the Forest Service managed Big Snowy WSA and can be recommended for Wilderness designation.
2300	SC099	Most BLM land management plans did not anticipate this change in use and therefore do not provide adequate guidance for protecting the resources and values associated with good stewardship practices. To minimize impacts, the BLM must inventory the public lands before making decisions about where to allow motorized vehicle use. The inventory should determine whether roads and trails were legally created. Assess how many user created two-tracks and trails have been created. Routes, roads, and trails should be presumed illegal and prohibited from inclusion in all maps unless there is credible and convincing evidence that the roads, routes, or trails are in fact legal. User created roads and trails are not legal. Public participation is required 43 CFR § 8342). (a) Public participation. The designation and redesignation of trails is accomplished through the resource management planning process described in part 1600 of this title. Current and potential impacts of specific vehicle types on all resources and uses in the planning area shall be considered in the process of preparing resource management plans, plan revisions or plan amendments. Prior to making designation or redesignations, the authorized officer shall consult with interested user groups ... and other parties in a manner that provides an opportunity for the public to express itself and have views given consideration.

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2300	SC099	Assess how the technological changes in motorized vehicles and the trends in vehicle use will affect future use and impacts on the land and resources.
2300	SC099	In analyzing the impacts to elk and other big game, it is important to look at total road densities (as opposed to just open or designated road densities) and include all motorized "trails" in the density standard. Calculate current road densities and the road densities for all of the alternatives. Evaluate the impacts of motorized vehicles on threatened and endangered species, candidate species, management indicator species, sensitive species, and species of concern.
2300	SC099	Evaluate how motorized vehicles will impact vegetation and contribute to the spread of noxious weeds.
2300	SC099	Assess how access provided for motorized vehicles will contribute to vandalism of historic and cultural sites.

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
2300	SC099	<p>What recreational opportunities will be provided for traditional hunters, hikers, or horseback riders seeking a more remote, primitive, quiet, and non-motorized experience? The evidence that motorized vehicle traffic conflicts with other uses is overwhelming. As levels of traffic rise, it becomes a dominant use, displacing traditional nonmotorized use. The DOI long ago recognized that adding off-road vehicle traffic subtracts from natural integrity, thereby displacing traditional backcountry visitors: "Any substantial ORV presence in a backcountry area tends to displace tranquility seeking visitors and preclude their further use of the area. " (DOI, Final EIS, Departmental Implementation of EO 11644, 1978) This conclusion has been substantiated -repeatedly-- by recreational research: The 1994 MT Trail Users Study found that 84% of equestrians and 89% of Montana hikers find off-road vehicles to be incompatible trail uses. Nearly three out of four Montanans (74%) who cross-country ski will avoid areas with snowmobile traffic. (MT Trail Users Study, ITRR UofM 1994). In a 1997 survey, two-thirds of Idaho residents oppose the use of motorized off-road vehicles such as ATVs and motorcycles in areas closed to cars and trucks. 70% would support restrictions on the use of motorized vehicles off roads during hunting seasons in large geographic areas such as watersheds or entire game management units. (Access and Off-Road Vehicle Mgmt, Idaho Public Policy Survey, Scudder, 1997). A 1998 survey by the Montana Hunter Behavior Council found: " Widespread concern about the use of ATVs and their negative impact on the sport of hunting is evident throughout the survey findings ..." What measures will be taken to avoid user conflict? Conflicts between motorized and non-motorized users are best minimized by creating large blocks of land for motorized use and large blocks for non-motorized use. With the passage of the Multiple Use Sustained Yield Act it has long been recognized that some uses are incompatible with others and that over a larger landscape uses should be separated with some uses managed to a lesser extent than others. Areas and trails shall be located to minimize conflicts between off-road vehicle use and other existing or proposed recreational uses of the same or neighboring public lands ... (43 CFR § 8342). How will the new RMP, including OHV management and travel planning, comply with the Federal Regulations (43 CFR 8342.1 and 8342.2, codifying Executive Orders 11644 and 11989, that instruct BLM on OHV management?</p>

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2300	SC099	The evidence that roads have an impact on wildlife is overwhelming. The RMP should incorporate studies such as the Cooperative Elk Logging Study, the most extensive wildlife research project ever undertaken by the Forest Service and State of Montana. The study provides irrefutable findings that roads - and motorized activity on them - impact elk. While lands managed by the Forest Service are generally more forested than those managed by the BLM, the impacts from roads and loss of security can be even greater in more open areas. The impact on elk and other wildlife from high road density needs to be addressed in the RMP.
2300	SC100	I would close all roads not historically used as a road. Also main access points could be used such as trailhead parking areas. The benefit to the public land would be huge in the respect that the environment wouldn't be abused (see Ah Nei). The majority of public land users wouldn't get blamed for the actions of a few.
2300	SC107	Unmanaged motorized recreation and conflict between motorized and nonmotorized recreationists. The RMP must protect wildlife habitat, botanical resources, cultural resources, and quiet recreation from the encroachment and expansion of motorized recreation. A road inventory should be done to determine if roads and tracts were legally created. All user created roads are illegal until each has been considered for designation in accordance with 43 CFR §8342. All motorized vehicles and drivers on public land should be licensed and street legal for the safety of all involved. The plan should provide a plan for enforcement.
2300	SC107	The RMP should provide a balance in use by creating quiet trail opportunities for hikers, horseback riders, and mountain bikers. The RMP should address the measures that will be taken to minimize user conflict especially between non-motorized and motorized users.
2300	SC117	The Pryor Mountain, Burnt Timber Canyon, and Big Horn Tack-on Wilderness Study Areas are adjacent to each other, separated only by primitive roads. All three of the WSAs were recommended by the BLM for Wilderness designation in 1991. To ensure they remain a viable option for consideration as wilderness, ask the BLM to identify and eliminate illegally created roads or other changes which might degrade the character of the WSAs.
2300	SC117	The Twin Coulee Wilderness Study Area, bordering the Forest Service managed Big Snowy WSA was NOT recommended for Wilderness designation by the BLM in 1991. Since then, the Forest Service has eliminated motorized vehicle use in most of the WSA improving its wilderness character. Ask the BLM to reevaluate the wilderness character of the Twin Coulee WSA and develop a plan to protect, restore and improve its wilderness values so that it is compatible with management of the big Snowy WSA and can be recommended for Wilderness designation.

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
2300	SC056	<p>The Environmental Protection Agency (EPA), Region 8, Montana Office has reviewed the May 15, 2008 Notice of Intent to prepare a Resource Management Plan (RMP) for the Bureau of Land Management (BLM) Billings Field Office and Pompeys Pillar National Monument and an associated Environmental Impact Statement (EIS). The EPA reviews EIS's accordance with its responsibilities under the National Environmental Policy Act (NEP A) and Section 309 of the Clean' Air Act. Section 309 of the Clean Air Act directs EPA to review and comment in writing on the environmental impacts of any major Federal agency action. EPA's draft EIS comments will include a rating of both the environmental impact of the proposed action and the adequacy of analysis and disclosure in the NEPA document. We are enclosing a brief summary that explains EPA's DEIS rating' system. It is EPA's expectation that the Billings Field Office and Pompeys Pillar National Monument RMPs EIS fulfill the basic intent of NEPA, and encompass to the maximum extent possible the environmental and public involvement requirements of State and Federal laws, Executive Orders, and policies (e.g., Clean Water Act, Clean Air Act, Endangered Species Act, E.O.11990 Protection of Wetlands, etc.). EPA's primary interests are protection and restoration of water quality, riparian and aquatic habitats, groundwater quality, source water protection, wetlands and air quality. The EPA is particularly interested in seeing the RMPs and EIS disclose: -the existing conditions for all environmental resources and the specification of gaps in current knowledge; -the BLM's desired conditions to assure sustainability of environmental resources; - identification of areas not currently meeting desired conditions; -a specific set of goals and objectives to guide future actions toward achievement of the desired conditions; --Best Management Practices (BMPs) for water quality protection; protection of riparian areas and wetlands; reduced water quality, fisheries, and wildlife impacts from roads; and maintenance and restoration of watershed health to achieve water quality that fully supports beneficial uses of surface waters in cooperation with State EPA Total Maximum Daily Load (TMDL) development and implementation efforts; and -a commitment to monitoring for determining the extent to which the RMP will achieve goals and objectives and to assure that BMPs are effective.</p>
2300	SC056	<p>The RMPs and EIS should also ensure that the cumulative impacts from management activities will meet all applicable environmental criteria in Montana. EPA will review proposed land management actions and alternatives, including energy development, grazing, transportation systems, mining, and off-highway vehicle management, for their potential to adversely affect environmental resources. Enclosed are EPA's more detailed scoping comments to assist in addressing NEP A requirements, and environmental and public involvement requirements of State and Federal laws, regulations and policies, and issues that will assist in the preparation of the EIS.</p>

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2300	SC109	The BLM must minimize conflicts between resources and thoughtfully consider how a particular resource use affects other resource values. Therefore, where incompatible uses exist, the BLM does have an obligation to provide a spectrum of opportunities that includes recreational opportunities for traditional hunters, hikers, or horseback riders seeking a more remote, primitive and quiet non-motorized trails should also be considered for mountain bikers outside of wilderness study areas and proposed wilderness.
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2300	SC109	Evaluate how motorized vehicles will impact vegetation and contribute to the spread of noxious weeds.
2300	SC109	Assess how access provided for motorized vehicles will contribute to vandalism of historic and cultural sites.

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<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
2300	SC109	The evidence that roads have an impact on wildlife is overwhelming. The RMP should incorporate studies such as the Cooperative Elk Logging Study, the most extensive wildlife research project ever undertaken by the Forest Service and State of Montana. The study provides irrefutable findings that roads - and motorized activity on them - impact elk. While lands managed by the Forest Service are generally more forested than those managed by the BLM, the impacts from roads and loss of security can be even greater in more open areas. The impact on elk and other wildlife from high road density needs to be addressed in the RMP.
2300	SC125	There needs to be an interagency plan for management of wildfires in the Pryors. Such plan would emphasize rehabilitation post fire.
2310	SC001	BLM has jurisdiction over some lands that are in the vicinity of houses built in the wildland urban interface. In order to reduce the risk of exposure to fire, management of these lands needs to prohibit all activities which would spark a fire event in the vicinity of the WUI. Prohibit campfires and motor vehicles and other internal combustion engines from administered lands adjacent to WUIs. Locate these uses in areas where fire suppression efforts are less costly. Strictly limiting the uses of lands adjacent to WUIs would help protect private property owners from loss due to fire and would reduce the expense to state and federal budgets for fire suppression efforts.
2310	SC028	These populations and communities can be protected by restricting off-road vehicle use as well as oil and gas development in much but not all of the BLM land in the area.
2310	SC028	The Wild Horse Range has large areas of highly erodible soils because of the steep, poorly vegetated slopes. Several rare plants occur in this area. Special management of ORV use and horse trampling is needed in order to protect the biological values of this area. Southern toeslopes of the Pryor Range and small included valleys harbor populations of rare plants and endemic plant communities. This area should be considered for special designation.
2310	SC030	Prohibition on ORV use.
2310	SC030	Oppose ORV use.
2310	SC099	Areas and trails shall be located to minimize damage to soil, watershed, vegetation, air, or other resources of the public lands, and to prevent impairment of wilderness suitability (43 CFR § 8342). Areas and trails shall be located to minimize harassment of wildlife or significant disruption of wildlife habitats. Special attention will be given to protect endangered or threatened species and their habitats (43 CFR § 8342).
2310	SC035	Please let OHV allowed to happen. It was once a while ago.

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
2310	SC090	Please continue to provide opportunities for motorized recreation in this area of the BLM's responsibility. In Montana especially motorized recreation opportunities have been vanishing at an astounding rate while the number motorized users keeps going up. Loop routes and challenging trails are especially in need.
2310	SC095	Access with 4-wheelers. Hunting, fishing and trapping. Private property blocking public access. Uphold laws that give us access to public lands. Fix up ATV roads and fishing and hunting access areas. Fixing up ATV roads might keep people from leaving main trail. Tougher fines for littering. Fines for not closing gates.
2310	SC096	Over the last four years, TSATV has been actively involved in US Forest Service Travel Management Plans for a number of areas, including actively in the following: <ul style="list-style-type: none"> -Beartooth and Ashland Ranger Districts of the Custer National Forest -Belt Creek, Judith, Musselshell and White Sulphur Springs Ranger Districts of the Lewis and Clark National Forest. Unfortunately, TSATV has not spent near enough time on BLM issues, except for the Ah Nei affair a few years ago. In the future, we would like to be more involved and are open to such things as volunteerism, maintenance, education, safety and other related topics. Our approach on the Forest Service Plans was to facilitate more openness and work on the topics just mentioned. Of particular importance was the Pryor Mountain area, including access through private land, the Crow Reservation and BLM land. Loop trails coming and going off BLM land is very important. TSATV members include the Pryors Mountain area, the area between Belfry, MT, and Warren, MT, and the area north of Lovell, WY, as very key access areas. We want to keep these areas open for OHV activities and would be willing to work with the BLM achieve this objective.
2310	SC099	Motorized vehicle use on public lands has exploded over the past 15-20 years. It isn't just the number of motorized vehicles but also new more powerful types of vehicles (e.g., dirt bikes, all-terrain vehicles, 4x4s, and rock-crawlers) with the capability to go farther and to places previously accessed only by foot and horse use.

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2310	SC099	<p>Most BLM land management plans did not anticipate this change in use and therefore do not provide adequate guidance for protecting the resources and values associated with good stewardship practices. To minimize impacts, the BLM must inventory the public lands before making decisions about where to allow motorized vehicle use. The inventory should determine whether roads and trails were legally created. Assess how many user created two-tracks and trails have been created. Routes, roads, and trails should be presumed illegal and prohibited from inclusion in all maps unless there is credible and convincing evidence that the roads, routes, or trails are in fact legal. User created roads and trails are not legal. Public participation is required 43 CFR § 8342). (a) Public participation. The designation and redesignation of trails is accomplished through the resource management planning process described in part 1600 of this title. Current and potential impacts of specific vehicle types on all resources and uses in the planning area shall be considered in the process of preparing resource management plans, plan revisions or plan amendments. Prior to making designation or redesignations, the authorized officer shall consult with interested user groups ... and other parties in a manner that provides an opportunity for the public to express itself and have views given consideration.</p>

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2310	SC100	<p>One concern is off road travel by motorized vehicles. I think wherever possible this should be stopped.</p>

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2310	SC107	Unmanaged motorized recreation and conflict between motorized and nonmotorized recreationists. The RMP must protect wildlife habitat, botanical resources, cultural resources, and quiet recreation from the encroachment and expansion of motorized recreation. A road inventory should be done to determine if roads and tracts were legally created. All user created roads are illegal until each has been considered for designation in accordance with 43 CFR §8342. All motorized vehicles and drivers on public land should be licensed and street legal for the safety of all involved. The plan should provide a plan for enforcement.
2310	SC119	Abuse of land-trash, driving off roads, dangerous shooting, shooting water tanks, cutting gates, fences. Foot traffic only, no motorized vehicles, better education of public on use of public lands, better respect for environment, better policing and control use of public land.
2310	SC120	Over use by certain users. Reduce AUMs, ATVs, and put serious thought into the areas for drilling-some areas should not have gas/oil activities at all and others need strict oversight. Gas and oil are not going to disappear so take your time deciding. Public land resources would have fewer weeds, more diverse vegetation to benefit wildlife and the biodiversity needed for a healthy environment.
2310	SC056	The RMPs and EIS should also ensure that the cumulative impacts from management activities will meet all applicable environmental criteria in Montana. EPA will review proposed land management actions and alternatives, including energy development, grazing, transportation systems, mining, and off-highway vehicle management, for their potential to adversely affect environmental resources. Enclosed are EPA's more detailed scoping comments to assist in addressing NEPA requirements, and environmental and public involvement requirements of State and Federal laws, regulations and policies, and issues that will assist in the preparation of the EIS.
2310	SC109	Motorized vehicle use on public lands has exploded over the past 15-20 years. It isn't just the number of motorized vehicles but also new more powerful types of vehicles (e.g., dirt bikes, all-terrain vehicles, 4x4s, and rock-crawlers) with the capability to go farther and to places previously accessed only by foot and horse use.

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
2310	SC109	<p>Most BLM land management plans did not anticipate this change in use and therefore do not provide adequate guidance for protecting the resources and values associated with good stewardship practices. To minimize impacts, the BLM must inventory the public lands before making decisions about where to allow motorized vehicle use. The inventory should determine whether roads and trails were legally created. Assess how many user created two-tracks and trails have been created. Routes, roads, and trails should be presumed illegal and prohibited from inclusion in all maps unless there is credible and convincing evidence that the roads, routes, or trails are in fact legal. User created roads and trails are not legal. Public participation is required 43 CFR § 8342). (a) Public participation. The designation and redesignation of trails is accomplished through the resource management planning process described in part 1600 of this title. Current and potential impacts of specific vehicle types on all resources and uses in the planning area shall be considered in the process of preparing resource management plans, plan revisions or plan amendments. Prior to making designation or redesignations, the authorized officer shall consult with interested user groups ... and other parties in a manner that provides an opportunity for the public to express itself and have views given consideration.</p>

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
2310	SC109	<p>What recreational opportunities will be provided for traditional hunters, hikers, or horseback riders seeking a more remote, primitive, quiet, and non-motorized experience? The evidence that motorized vehicle traffic conflicts with other uses is overwhelming. As levels of traffic rise, it becomes a dominant use, displacing traditional nonmotorized use. The DOI long ago recognized that adding off-road vehicle traffic subtracts from natural integrity, thereby displacing traditional backcountry visitors: "Any substantial ORV presence in a backcountry area tends to displace tranquility seeking visitors and preclude their further use of the area. " (DOI, Final EIS, Departmental Implementation of EO 11644, 1978) This conclusion has been substantiated -repeatedly-- by recreational research: The 1994 Montana Trail Users Study found that 84% of equestrians and 89% of MT hikers find off-road vehicles to be incompatible trail uses. Nearly three out of four Montanans (74%) who cross-country ski will avoid areas with snowmobile traffic. (MT Trail Users Study, ITRR UofM, 1994). In a 1997 survey, two-thirds of Idaho residents oppose the use of motorized off-road vehicles such as ATVs and motorcycles in areas closed to cars and trucks. 70% would support restrictions on the use of motorized vehicles off roads during hunting seasons in large geographic areas such as watersheds or entire game management units. (Access and Off-Road Vehicle Mgmt, Idaho Public Policy Survey, Scudder, 1997). A 1998 survey by the MT Hunter Behavior Council found: " Widespread concern about the use of ATVs and their negative impact on the sport of hunting is evident throughout the survey findings ..." What measures will be taken to avoid user conflict? Conflicts between motorized and non-motorized users are best minimized by creating large blocks of land for motorized use and large blocks for non-motorized use. With the passage of the Multiple Use Sustained Yield Act it has long been recognized that some uses are incompatible with others and that over a larger landscape uses should be separated with some uses managed to a lesser extent than others. Areas and trails shall be located to minimize conflicts between off-road vehicle use and other existing or proposed recreational uses of the same or neighboring public lands ... (43 CFR § 8342). How will the new RMP, including OHV management and travel planning, comply with the Federal Regulations (43 CFR 8342.1 and 8342.2, codifying Executive Orders 11644 and 11989, that instruct BLM on OHV management?</p>
2310	SC125	<p>Threats to these plants and plant communities are off-road travel, introduction of weeds, cattle grazing. (This particular area may have been withdrawn from cattle grazing.) Some of the areas adjacent to the PMWHR are being proposed for annexation into the wild horse range, specifically Demijohn Flats. Grazing by horses may threaten these plants.</p>

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
2310	SC125	BLM has done a good job of closing roads in the South Pryor Desert and PMWHR with signs and barricades. However as ATV traffic increases we expect to see more cross-country travel. The Billings Field Office law enforcement officer has made an admirable effort to organize a Citizen's Watch, but that not been successful. Some arrangement needs to be made to better monitor and enforce rules prohibiting off-road travel. One law enforcement officer for the Billings Resource Area can not do it all.
2311	SC014	Mountain biking access and opportunity.
2311	SC030	Support hunting, fishing, and hiking access (limited mountain biking).
2311	SC051	Walk or bicycle only. Better policing by BLM and education of public by BLM. Forest Service is much stricter about use. Why can't BLM be the same?
2311	SC094	Please provide a balance in use by creating quiet trail opportunities for hikers, equestrians, and mountain bikers.
2311	SC098	Provide a balance in user by creating quiet trail opportunities for hikers, equestrians, mountain bikers.

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
2311	SC099	<p>What recreational opportunities will be provided for traditional hunters, hikers, or horseback riders seeking a more remote, primitive, quiet, and non-motorized experience? The evidence that motorized vehicle traffic conflicts with other uses is overwhelming. As levels of traffic rise, it becomes a dominant use, displacing traditional nonmotorized use. The DOI long ago recognized that adding off-road vehicle traffic subtracts from natural integrity, thereby displacing traditional backcountry visitors: "Any substantial ORV presence in a backcountry area tends to displace tranquility seeking visitors and preclude their further use of the area. " (DOI, Final EIS, Departmental Implementation of EO 11644, 1978) This conclusion has been substantiated -repeatedly-- by recreational research: The 1994 MT Trail Users Study found that 84% of equestrians and 89% of Montana hikers find off-road vehicles to be incompatible trail uses. Nearly three out of four Montanans (74%) who cross-country ski will avoid areas with snowmobile traffic. (MT Trail Users Study, ITRR UofM, 1994). In a 1997 survey, two-thirds of Idaho residents oppose the use of motorized off-road vehicles such as ATVs and motorcycles in areas closed to cars and trucks. 70% would support restrictions on the use of motorized vehicles off roads during hunting seasons in large geographic areas such as watersheds or entire game management units. (Access and Off-Road Vehicle Mgmt, Idaho Public Policy Survey, Scudder, 1997). A 1998 survey by the Montana Hunter Behavior Council found: " Widespread concern about the use of ATVs and their negative impact on the sport of hunting is evident throughout the survey findings ..." What measures will be taken to avoid user conflict? Conflicts between motorized and non-motorized users are best minimized by creating large blocks of land for motorized use and large blocks for non-motorized use. With the passage of the Multiple Use Sustained Yield Act it has long been recognized that some uses are incompatible with others and that over a larger landscape uses should be separated with some uses managed to a lesser extent than others. Areas and trails shall be located to minimize conflicts between off-road vehicle use and other existing or proposed recreational uses of the same or neighboring public lands ... (43 CFR § 8342). How will the new RMP, including OHV management and travel planning, comply with the Federal Regulations (43 CFR 8342.1 and 8342.2, codifying Executive Orders 11644 and 11989, that instruct BLM on OHV management?</p>
2311	SC106	<p>Wild horse and wildlife protect and responsible viewing opportunities. Special status species protection. Livestock grazing. Water and air quality issues. OHV travel. Cultural tourism.</p>

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
2311	SC106	Expansion of the Pryor Mountain Wild Horse Range. Termination of lethal predator and "pest" control activities. Restriction on OH travel and hunting. Voluntary livestock grazing permit buy-outs. Great protect of a significant wild horse herd. A full complement of faunal species for healthy ecosystem functioning and increase natural regulation of populations of wildlife. Increased public understanding and appreciation for historic and cultural resources.
2311	SC107	Unmanaged motorized recreation and conflict between motorized and nonmotorized recreationists. The RMP must protect wildlife habitat, botanical resources, cultural resources, and quiet recreation from the encroachment and expansion of motorized recreation. A road inventory should be done to determine if roads and tracts were legally created. All user created roads are illegal until each has been considered for designation in accordance with 43 CFR §8342. All motorized vehicles and drivers on public land should be licensed and street legal for the safety of all involved. The plan should provide a plan for enforcement.
2311	SC107	The RMP should provide a balance in use by creating quiet trail opportunities for hikers, horseback riders, and mountain bikers. The RMP should address the measures that will be taken to minimize user conflict especially between non-motorized and motorized users.
2311	SC107	The RMP should assess the impact of motorized recreation on the spread of noxious weeds. Preventing the spread of noxious weeds should be a high priority of the RMP.
2311	SC117	Ask the BLM to provide a balance in use by creating quiet trail opportunities for hikers, equestrians, and mountain bikers.
2311	SC119	Abuse of land-trash, driving off roads, dangerous shooting, shooting water tanks, cutting gates, fences. Foot traffic only, no motorized vehicles, better education of public on use of public lands, better respect for environment, better policing and control use of public land.

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
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2312	SC099	<p>The BLM is not obligated to authorize any airstrips just because a plane landed Balm land sometime in the past. Airstrips are not compatible with all values and need to be located away from more primitive and remote settings. It is highly unlikely that any airstrips identified through the RMP process were created to accommodate recreation use, which is a more recent phenomenon.</p>

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
4000	SC094	The BLM has the authority to identify and inventory resources and other values, and designate or increase the size of special management areas (such as ACECs) as a component of the land use planning process. To the utmost of your ability, you should identify other areas for special management consideration that possess natural, remote, and/or primitive characteristics.
4000	SC098	Inventory the nine ACECs to determine whether they are managed in accordance with the values for which they were created and where needed take corrective action such as signage, enforcement, restoration etc. Identify other areas for special management consideration that possess natural, remote, and/or primitive characteristics.
4000	SC099	How will the BLM use its Section 201 FLMPMA authority to identify and inventory resources and other values, and designate special management areas (such as ACECs) as a component of the land use planning process? We ask that you identify undesignated areas within the planning area that possess natural, remote, and/or primitive characteristics and consider them for special management designation.
4000	SC099	Are any BLM lands leased out for wind farms? Through the RMP process, some criterion should be developed which considers the appropriateness and compatibility of wind farms and other large industrial projects when situated in or adjacent to special management lands or lands with high wildlife values.
4000	SC107	WSAs and areas of special designation areas such as ACECs should be inventoried to determine if they are being managed in accordance with the values for which they were designation.
4000	SC107	Motorized recreation should be prohibited from special designated areas to protect the resources. The RMP should specify how corrective actions will be taken to restore areas where needed. The RMP should authorize inventories to identify other possible areas for special designation and protection.
4000	SC117	The BLM has the authority to identify and inventory resources and other values, and designate or increase the size of special management areas (such as ACECs) as a component of the land use planning process. Ask the BLM to identify other areas for special management consideration that possess natural, remote, and/or primitive characteristics.
4000	SC109	How will the BLM use its Section 201 FLMPMA authority to identify and inventory resources and other values, and designate special management areas (such as ACECs) as a component of the land use planning process? We ask that you identify undesignated areas within the planning area that possess natural, remote, and/or primitive characteristics and consider them for special management designation.
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4050	SC005	I would consider the ACECs as an "evolving environment" on in which the lands can be restored to previous use after development has been in place and that "timing window" is closed. As a result, resources would be used and land users would be allowed to use the land again, maybe not this generation of 20-40 year period users, but the land can be reclaimed.
4050	SC028	Areas with high concentrations of endemic species should be considered for ACEC designation, especially those with highly erodible soils.
4050	SC028	I suggest expanding the Meeteetse Spires ACEC to include populations of other rare plants.
4050	SC094	I ask that the BLM inventory the nine ACECs to determine whether they are managed in accordance with the values for which they were created and where needed take corrective action such as signage, enforcement, restoration etc.
4050	SC094	The BLM has the authority to identify and inventory resources and other values, and designate or increase the size of special management areas (such as ACECs) as a component of the land use planning process. To the utmost of your ability, you should identify other areas for special management consideration that possess natural, remote, and/or primitive characteristics.
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4050	SC099	Ask the BLM to inventory the nine ACECs to determine whether they are managed in accordance with the values for which they were created and if necessary, explain what corrective action will be taken such as signage, enforcement, restoration, etc.
4050	SC099	How will the BLM use its Section 201 FLMPMA authority to identify and inventory resources and other values, and designate special management areas (such as ACECs) as a component of the land use planning process? We ask that you identify undesignated areas within the planning area that possess natural, remote, and/or primitive characteristics and consider them for special management designation.
4050	SC117	Ask the BLM to inventory the nine ACECs to determine whether they are managed in accordance with the values for which they were created and if necessary, explain what corrective action will be taken such as signage, enforcement, restoration, etc.

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
4050	SC117	The BLM has the authority to identify and inventory resources and other values, and designate or increase the size of special management areas (such as ACECs) as a component of the land use planning process. Ask the BLM to identify other areas for special management consideration that possess natural, remote, and/or primitive characteristics.
4050	SC123	Enlarge the size of the area of critical environmental concern for the public land around Weatherman Draw to include all prehistoric and historic cultural resources.
4050	SC123	Inventory and protect cultural resources around the Pryor Mountains by establishing areas of critical environmental concern.
4050	SC109	Ask the BLM to inventory the nine ACECs to determine whether they are managed in accordance with the values for which they were created and if necessary, explain what corrective action will be taken such as signage, enforcement, restoration, etc.
4050	SC109	How will the BLM use its Section 201 FLMPMA authority to identify and inventory resources and other values, and designate special management areas (such as ACECs) as a component of the land use planning process? We ask that you identify undesignated areas within the planning area that possess natural, remote, and/or primitive characteristics and consider them for special management designation.
4050	SC125	I would like to place into consideration the conservation of the rare plants and plant communities of the South Pryor Desert. This is based on the work Peter Lesica did in the 1990's. Lesica recommended setting aside one and a half sections in the Gypsum Creek - Crooked Creek area. T9S R27E, W half of R28E. (Did he mean the eastern half of R28E?) This would conserve 8 of 15 high priority vascular plant species. ACEC status might be appropriate.
4200	SC007	Do not want any wild and scenic river designations.
4250	SC017	BLM must include the WSA status of all federal land adjacent to the Snowy Mountains Wilderness Study Area avowedly administered by the FS.
4250	SC094	The Pryor Mountain, Burnt Timber Canyon, and Big Horn Tack-on Wilderness Study Areas are adjacent to each other, separated only by primitive roads. All three of the WSAs were recommended by the BLM for Wilderness designation in 1991. To ensure they remain a viable option for consideration as wilderness, I ask you to identify and eliminate illegally created roads or other changes which might degrade the character of the WSAs.

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
4250	SC094	The Twin Coulee Wilderness Study Area, bordering the Forest Service managed Big Snowy WSA was NOT recommended for Wilderness designation by the BLM in 1991. Since then, the Forest Service has eliminated motorized vehicle use in most of the WSA improving its wilderness character. Therefore, please reevaluate the wilderness character of the Twin Coulee WSA and develop a plan to protect, restore and improve its wilderness values so that it is compatible with management of the Big Snowy WSA and can be recommended for Wilderness designation.
4250	SC098	Identify any illegal roads or other changes in the Pryor Mountain, Burnt Timber Canyon, and Big Horn Tack-on Wilderness Study Areas to assure they remain viable for wilderness designation.
4250	SC098	Develop a plan to protect, restore, and improve the wilderness values of the Twin Coulee WSA so that it is compatible with the Big Snowy WSA for designation as wilderness.
4250	SC099	The BLM must minimize conflicts between resources and thoughtfully consider how a particular resource use affects other resource values. Therefore, where incompatible uses exist, the BLM does have an obligation to provide a spectrum of opportunities that includes recreational opportunities for traditional hunters, hikers, or horseback riders seeking a more remote, primitive and quiet non-motorized trails should also be considered for mountain bikers outside of wilderness study areas and proposed wilderness.
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4250	SC109	Please provide the public with the original inventory maps for the four wilderness study areas. The maps should identify the boundaries as well as roads, routes and other man-made developments within the WSAs.
4300	SC094	The Pryor Mountain, Burnt Timber Canyon, and Big Horn Tack-on Wilderness Study Areas are adjacent to each other, separated only by primitive roads. All three of the WSAs were recommended by the BLM for Wilderness designation in 1991. To ensure they remain a viable option for consideration as wilderness, I ask you to identify and eliminate illegally created roads or other changes which might degrade the character of the WSAs.

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4300	SC094	The Twin Coulee Wilderness Study Area, bordering the Forest Service managed Big Snowy WSA was NOT recommended for Wilderness designation by the BLM in 1991. Since then, the Forest Service has eliminated motorized vehicle use in most of the WSA improving its wilderness character. Therefore, please reevaluate the wilderness character of the Twin Coulee WSA and develop a plan to protect, restore and improve its wilderness values so that it is compatible with management of the Big Snowy WSA and can be recommended for Wilderness designation.
4300	SC099	Multiple use should not be construed to mean that all uses must be allowed in all places. Multiple use is a combination of balanced and diverse resources used over a large landscape that takes into account the long-term needs of future generations, including, but not limited to, recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific and historic values. Multiple use allows for future but as yet unknown or currently undervalued uses that arise from changing needs and conditions. Wilderness is included in the multiple use doctrine.
4300	SC099	The Pryor Mountain, Burnt Timber Canyon, and Big Horn Tack-on Wilderness Study Areas are adjacent to each other, separated only by primitive roads. All three of the WSAs were recommended by the BLM for Wilderness designation in 1991. To ensure they remain a viable option for consideration as wilderness, please identify any illegally created roads or other changes which might diminish the wilderness character of the WSAs.
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4300	SC099	Areas and trails shall be located to minimize damage to soil, watershed, vegetation, air, or other resources of the public lands, and to prevent impairment of wilderness suitability (43 CFR § 8342). Areas and trails shall be located to minimize harassment of wildlife or significant disruption of wildlife habitats. Special attention will be given to protect endangered or threatened species and their habitats (43 CFR § 8342).
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4350	SC008	I would like to see the wild horses and their areas left alone. 4x4 access to see them is important to people such as myself, i.e., elderly, and not able to walk very far. The wild horses are an integral part of Montana and its tourism. People from all over the world and of all walks of life come to see these horses--spend their money! We only have 1 wild horse range in Montana. I believe it is important to keep them there and in their wild state. I would also like to see a mountain lion study done on the Pryors--their effect on the population--mountain lions are a more natural population control than that horrendous PZP. A study done with a halt to mountain lion hunting while it is being conducted.
4350	SC010	Protect Pryor Mountain wild horses. Work with NPS and USFS to expand range.
4350	SC011	Pryor Mountain wild horse herd and habitat.
4350	SC021	Use of land to maintain wild horse herd.
4350	SC027	My main concern is that the Pryor Mountain horses be protected and preserved with sustainable and genetically viable populations. Stop any roundups or removals. Cancel grazing allotments and logging and oil drilling. Buy up permit and more land. Allow more wild horses to remain on the Pryor Mountain HMA and increase the acreage allowed for them. Remove cattle and/or sheep and stop logging or oil drilling and development.
4350	SC028	Many species of plants as well as several plant communities that occur in the Pryors and Clark's Fork valley are found nowhere else on earth. Only one other area of Montana has such high endemism.
4350	SC031	All issues are very important; however we are mostly interested in the Pryor Mountain Herd management and the horses in the HMA.
4350	SC037	Keeping the horse herd down to keep and protect the grasslands. When my father made arrangements with BLM, the proposal was that there were not to be more than 90-120 head at any one time. Protect the reservoir.
4350	SC093	The Pryor Mountain Wild Horse Range should be expanded, as our wild horses are another important cultural resource.

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
4350	SC105	One issue I have is the state of the wild horse ranges. I feel that the forest needs to be cleaned out in the Burnt Timber area, as it now stands it is a potential major fire hazard. I also feel that the range needs to be expanded with more water catchments put in. Weed control also needs to be addressed. Get a lot of volunteers to help clean out forest and to spray non-native weeds. Put in place water catchments to have a more spread out use of the range. Expand the range to the original size and possible add to it. This would open up more views of the wild horses and give them more spaces to roam and feed. Water is the most critical part of this plan. Also the cleaning of the forest would prevent major fire concerns as well of opening up more range land.
4350	SC106	Expansion of the Pryor Mountain Wild Horse Range. Termination of lethal predator and "pest" control activities. Restriction on OHV travel and hunting. Voluntary livestock grazing permit buy-outs. Great protection of a significant wild horse herd. A full complement of faunal species for healthy ecosystem functioning and increase natural regulation of populations of wildlife. Increased public understanding and appreciation for historic and cultural resources.
4350	SC107	The RMP should maintain the existing size of the Pryor Mountain Wild Horse Range. In managing the wild horses, the health of the range and other wildlife should be considered. The herd size should be maintained at a level that will protect the range and other resources. Consider working with the Crow Tribe to set up a non-adjacent satellite herd to maintain the genetic viability of the herd. If culled horses cannot be adopted, consider other uses for the animals including slaughter or euthanasia.
4350	SC118	In regards to changes for the Billings Resource Management Plan, the Pryor Mountain Wild Mustang Center recommends that the Administrative Pasture area of the Pryor Mountain Wild Horse Range be reopened to use by the Pryor Mountain Wild Horses. This change would benefit the wild horses by providing them with more winter range. This change would likely benefit other wildlife in the area as well. The potential for expansion of the Pryor Mountain Wild Horse Range onto adjacent Bureau of Land Management lands should also be considered.
4350	SC123	The Pryor Mountain horse herd needs more pasture and priority should include any private land in the established horse range and winter habitat.
4350	SC125	Threats to these plants and plant communities are off-road travel, introduction of weeds, cattle grazing. (This particular area may have been withdrawn from cattle grazing.) Some of the areas adjacent to the PMWHR are being proposed for annexation into the wild horse range, specifically Demijohn Flats. Grazing by horses may threaten these plants.
4350	SC125	Annexation of lands for winter pasture into the PMWHR may need consideration in the RMP.

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
4350	SC125	Reseeding of the desert areas of PMWHR with native grasses which might require doing test plots to assure that helicopter seeding and mulching would be effective. The Administrative Pasture of the PMWHR could be one test plot. Although this is within a WSA, reseeding would not impair the wilderness value of that pasture.
4400	SC111	I am affiliated with the Rochejhone Chapter of the Lewis and Clark Trail Heritage Foundation. We are based in Billings and our main function is to help keep the legacy of the Expedition in the eyes of the people. My purpose today is to make our resources known to you and to offer our assistance when ever an opportunity may avail itself to help educate the public. Our membership has a significant background in many areas associated with the Expedition and would offer our expertise to you if the [floater's guide] series is ever updated or when ever Lewis and Clark information is involved. We see many opportunities and would like to meet with your staff at your convenience. I would be happy to serve as a contact for the body until a formal chain is established. I have personally mapped Clark's traverse line based on his survey logs in Stillwater County as well as some of Yellowstone County. That included an 1806 magnetic declination study as well as a historic fluvial morphology study, in order to more closely locate Clark's campsites and horse crossing, etc.
5050	SC001	BLM has jurisdiction over some lands that are in the vicinity of houses built in the wildland urban interface. In order to reduce the risk of exposure to fire, management of these lands needs to prohibit all activities which would spark a fire event in the vicinity of the WUI. Prohibit campfires and motor vehicles and other internal combustion engines from administered lands adjacent to WUIs. Locate these uses in areas where fire suppression efforts are less costly. Strictly limiting the uses of lands adjacent to WUIs would help protect private property owners from loss due to fire and would reduce the expense to state and federal budgets for fire suppression efforts.
5050	SC008	I would like to see the wild horses and their areas left alone. 4x4 access to see them is important to people such as myself, i.e., elderly, and not able to walk very far. The wild horses are an integral part of Montana and its tourism. People from all over the world and of all walks of life come to see these horses--spend their money! We only have 1 wild horse range in Montana. I believe it is important to keep them there and in their wild state. I would also like to see a mountain lion study done on the Pryors-their effect on the population-mountain lions are a more natural population control than that horrendous PZP. A study done with a halt to mountain lion hunting while it is being conducted.
5050	SC020	With increase population in the Billings area and the increase in fuel prices, more people will be recreating close to home--therefore more people will be impacting public lands closer to Billings.

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
5050	SC024	I believe there has been enough money spent on the Pompeys Pillar rock! I would suggest waiting before any more is spent to see if it is feasible. With gas prices high and going up, people will have to conserve and cut down on their traveling.
5050	SC034	Multiple use is critical. Especially oil, gas, mineral extraction.
5050	SC040	What does the wild existence have to do with public land resources, users, communities, etc? These horses and wildlife exist in the wild. Leave it all natural.
5050	SC041	Make sure that public land use is accessible to all groups of the public for multi-use recreation. It also needs consideration for economic impacts so it is not a taxpayer burden.
5050	SC042	Please consider administrative effects as well as resources. For example, do your admin decisions affect county land use patterns, infrastructure investments, payroll in communities, housing availability, county finances, etc? What are the socioeconomic effects of your resource decisions?
5050	SC093	It's not fair for a few businesses to make huge profits from our public lands.
5050	SC093	Communities always benefit from wee-managed public lands, through tourism and a higher standard of living. Although a few specific businesses may suffer by losing an unfair advantage, the business community in general will be healthier.
5050	SC096	One of the issues we dealt with was the economic impact of various OH recreation activities around the various forest ranger districts. Since the BLM's RMP is so connected with the Beartooth Ranger District in the areas south of Billings, there is a natural tie in with the economic impact to Billings and many of the surrounding smaller communities.
5050	SC099	Multiple use also should not be construed to mean that extractive uses are preferred over other uses. The BLM cannot authorize a particular use based purely on the contribution of that use to the economy.
5050	SC099	Protected landscapes attract tourists who contribute to local economies. But the same features which attract tourists also serve as a magnet to attract and keep residents to live, work and conduct business in nearby communities. Their contribution to local economies and to the stability and well being of their communities is generally even greater than tourism. How will the analysis assess the economic benefits of protected landscapes? How will the analysis assess the boom and bust associated with extractive industry on local communities?
5050	SC101	Declaration of unsuitability for public lands/resources thus alienating them and associated non-public interest from economic contribution. Isn't such a taking of non-public values so effected?

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
5050	SC101	Focus on economic recovery and energy support.
5050	SC101	The concept as it has been sold to the public, is that a mix of grass roots user concerns will be woven into a rug that provides for responsible resource uses and that the local and regional economies will benefit.
5050	SC105	Let the public work with you so they know it is truly a part of their land and resources. This would also boost the economy of the areas around the wild horse range.
5050	SC106	Expansion of the Pryor Mountain Wild Horse Range. Termination of lethal predator and "pest" control activities. Restriction on OH travel and hunting. Voluntary livestock grazing permit buy-outs. Great protect of a significant wild horse herd. A full complement of faunal species for healthy ecosystem functioning and increase natural regulation of populations of wildlife. Increased public understanding and appreciation for historic and cultural resources.
5050	SC107	Expansion of housing developments adjacent or within BLM lands is increasing. The RMP should develop guidelines for acquiring inholdings and educating adjacent private property owners on fire suppression and other issues that might arise living adjacent to public land. Taxpayers should not have to pay the cost of fire fighting on private property.
5050	SC108	BLM has land tracts that are not currently economic with the AUMs allowed. These tracts have not been readjusted for 40 years. The suspended AUMs have disappeared in the interval. It would be interesting to know how that was managed and whether BLM ever intends to revisit the suspended AUMs.
5050	SC121	Our new, large scale underground mine will be part of the existing situation by the time the RMP is completed. A change in the RMP's decision limiting underground coal lease could have substantial negative economic impacts to our investment, our employees and the local economy, if it results in a premature closure of the mine in the future. Signal believes that the environmental information gathered since the plan was completed indicates that the 1984 decision to allow leasing for underground reserves remains valid.
5050	SC109	Multiple use also should not be construed to mean that extractive uses are preferred over other uses. The BLM cannot authorize a particular use based purely on the contribution of that use to the economy.
5050	SC109	Protected landscapes attract tourists who contribute to local economies. But the same features which attract tourists also serve as a magnet to attract and keep residents to live, work and conduct business in nearby communities. Their contribution to local economies and to the stability and well being of their communities is generally even greater than tourism. How will the analysis assess the economic benefits of protected landscapes? How will the analysis assess the boom and bust associated with extractive industry on local communities?

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
5050	SC124	Musselshell County has a long history of coal mining. Currently, Bull Mountains Coal Mine No. 1 is located in Musselshell County, and is scheduled to come on line with a longwall operation in late 2009. This mine will provide economic opportunities for the businesses in our community, employment opportunities for the residents of our County, and valuable tax revenues to improve our schools, community services and infrastructure. The mine has demonstrated a willingness to train our local young people for jobs that pay a livable wage.
5050	SC124	In light of the rich history of coal mining in Musselshell County, and the current economic opportunities as a result of the developing underground Bull Mountains Coal Mine No.1, the County Commissioners of Musselshell County believe it is imperative that the BLM give serious consideration to the development of future underground and surface coal mining on federally managed lands in Musselshell County. Many of these federally managed parcels contain economically recoverable deposits of coal. Most of these deposits can be developed by underground mining methods, but some BLM lands contain coal deposits that can and should be developed by surface mining methods. It is important the RMP process include opportunities for these lands to be developed for coal mining. Therefore, we strongly encourage the BLM to include both surface and coal mining opportunities as part of the BLM's BiFO RMP process.
5050	SC128	BLM should address the recoverable oil and gas resource potential and how that potential affects domestic supply and demand. BLM should analyze and define the impact that various stipulations cause on the access of recoverable reserves.
5050	SC128	BLM should expand its socioeconomic analysis to include the cost of stipulations such as: affordable energy, school funding, jobs, tax and royalty revenue.
5050	SC128	Prior to implementing oil and gas stipulations, BLM should conduct a complete cost/benefit analysis of the stipulation, conduct a thorough data review on the proposed stipulations, and adapt a monitoring program tracking the effectiveness of the stipulations.
5100	SC042	Please consider administrative effects as well as resources. For example, do your admin decisions affect county land use patterns, infrastructure investments, payroll in communities, housing availability, county finances, etc? What are the socioeconomic effects of your resource decisions?

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
5100	SC099	Protected landscapes attract tourists who contribute to local economies. But the same features which attract tourists also serve as a magnet to attract and keep residents to live, work and conduct business in nearby communities. Their contribution to local economies and to the stability and well being of their communities is generally even greater than tourism. How will the analysis assess the economic benefits of protected landscapes? How will the analysis assess the boom and bust associated with extractive industry on local communities?
5100	SC109	Protected landscapes attract tourists who contribute to local economies. But the same features which attract tourists also serve as a magnet to attract and keep residents to live, work and conduct business in nearby communities. Their contribution to local economies and to the stability and well being of their communities is generally even greater than tourism. How will the analysis assess the economic benefits of protected landscapes? How will the analysis assess the boom and bust associated with extractive industry on local communities?
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5100	SC128	BLM should expand its socioeconomic analysis to include the cost of stipulations such as: affordable energy, school funding, jobs, tax and royalty revenue.
6000	SC053	This brief provides a cutting-edge, scientific framework which the agency can use to identify habitat and wildlife impacts that must be analyzed in planning. It demonstrates the potential impacts on wildlife of habitat fragmentation from oil and gas development at various well-pad densities, and offers methodologies to assist the BLM to fulfill its FLPMA and NEPA responsibilities to analyze the direct, indirect, and cumulative impacts on wildlife of proposed oil and gas development in the agency's resource management plans.
6000	SC053	Conduct a spatial analysis of the direct, indirect, and cumulative impacts on wildlife of all proposed oil and gas development alternatives.
6000	SC053	Conduct landscape-scale analyses to evaluate impacts and provide sound ecological protection for a landscape's wildlife, habitat, and other ecological resources.
6000	SC053	Use GIS technology to evaluate the impacts of oil and gas development on wildlife.

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
6000	SC053	Use landscape analysis techniques to improve public engagement.
6000	SC099	The BLM must minimize conflicts between resources and thoughtfully consider how a particular resource use affects other resource values. Therefore, where incompatible uses exist, the BLM does have an obligation to provide a spectrum of opportunities that includes recreational opportunities for traditional hunters, hikers, or horseback riders seeking a more remote, primitive and quiet non-motorized trails should also be considered for mountain bikers outside of wilderness study areas and proposed wilderness.
6000	SC101	Change the BLM practice of allowing extra regional input to override Montana/local interests (i.e., Upper Missouri Monument).
6000	SC101	In fact, internal agency bias, bent far left, overrides grass roots input and leads to lock up of most of our commodity resources.. Recreation and wildlife are the winners. Consider what happened in the case of the Upper Missouri Monument. What a scam.
6000	SC101	As an example, the state director and Montana governor signed a ROD in the 1980s designating ROW corridors across Montana. Those corridors were coordinated regionally into the Dakotas, Wyoming, Idaho, Washington and Oregon. The corridors were mapped and filed for the record with the state, BLM and USFS. Yet, when the latest corridor planning began, no record of the 80s work could be found. I have copies of the earlier work, but no one in the agencies will review it.
6000	SC108	Evaluate BLM's compliance with its previous RMP (84) and whether the goals and projects to be achieved were attained and/or completed and are currently desirable.
6000	SC116	This brief provides a cutting-edge, scientific framework which the agency can use to identify habitat and wildlife impacts that must be analyzed in planning. It demonstrates the potential impacts on wildlife of habitat fragmentation from oil and gas development at various well pad densities, and offers methodologies to assist the BLM to fulfill its FLPMA and NEPA responsibilities to analyze the direct, indirect, and cumulative impacts on wildlife of proposed oil and gas development in the agency's resource management plans. Employing the methodologies outlined in the brief will allow the BLM to effectively manage oil and gas development while ensure protection of the many other valuable resources on our public lands.

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
6000	SC056	<p>The Environmental Protection Agency (EPA), Region 8, Montana Office has reviewed the May 15, 2008 Notice of Intent to prepare a Resource Management Plan (RMP) for the Bureau of Land Management (BLM) Billings Field Office and Pompeys Pillar National Monument and an associated Environmental Impact Statement (EIS). The EPA reviews EIS's accordance with its responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean' Air Act. Section 309 of the Clean Air Act directs EPA to review and comment in writing on the environmental impacts of any major Federal agency action. EPA's draft EIS comments will include a rating of both the environmental impact of the proposed action and the adequacy of analysis and disclosure in the NEPA document. We are enclosing a brief summary that explains EPA's DEIS rating' system. It is EPA's expectation that the Billings Field Office and Pompeys Pillar National Monument RMPs EIS fulfill the basic intent of NEPA, and encompass to the maximum extent possible the environmental and public involvement requirements of State and Federal laws, Executive Orders, and policies (e.g., Clean Water Act, Clean Air Act, Endangered Species Act, E.O.11990 Protection of Wetlands, etc.). EPA's primary interests are protection and restoration of water quality, riparian and aquatic habitats, groundwater quality, source water protection, wetlands and air quality. The EPA is particularly interested in seeing the RMPs and EIS disclose: -the existing conditions for all environmental resources and the specification of gaps in current knowledge; -the BLM's desired conditions to assure sustainability of environmental resources; - identification of areas not currently meeting desired conditions; -a specific set of goals and objectives to guide future actions toward achievement of the desired conditions; --Best Management Practices (BMPs) for water quality protection; protection of riparian areas and wetlands; reduced water quality, fisheries, and wildlife impacts from roads; and maintenance and restoration of watershed health to achieve water quality that fully supports beneficial uses of surface waters in cooperation with State EPA Total Maximum Daily Load (TMDL) development and implementation efforts; and -a commitment to monitoring for determining the extent to which the RMP will achieve goals and objectives and to assure that BMPs are effective.</p>
6000	SC056	<p>A Summary of Significant Issues is included at the beginning of the enclosure to identify EPA's more significant RMP and EIS information disclosure and analysis issues. Our experience has shown that when environmental concerns are thoroughly evaluated, the EIS is a more meaningful document that will result in better decisions.</p>

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
6000	SC109	The BLM must minimize conflicts between resources and thoughtfully consider how a particular resource use affects other resource values. Therefore, where incompatible uses exist, the BLM does have an obligation to provide a spectrum of opportunities that includes recreational opportunities for traditional hunters, hikers, or horseback riders seeking a more remote, primitive and quiet non-motorized trails should also be considered for mountain bikers outside of wilderness study areas and proposed wilderness.
6050	SC120	I did/do not agree with the response a BLM rep. made-"If 10,000 'votes' come in versus 1 substantive comment here tonight, we'd listen to this one." Comments from the public are not votes, they're expression of how they want their public lands managed and can't write on every RMP.
6050	SC128	BLM should tier off of existing EISs and Eas (Montana Statewide Oil and Gas EIS).
6051	SC012	Will any additional funding be needed to implement the proposed plans?
6051	SC042	Energy usage by the BLM in carrying out its management activities.
6051	SC046	There is not enough monitoring of BLM lands.
6051	SC053	Encourage research on habitat fragmentation indicators for wildlife of local importance.
6051	SC099	Provide a plan to enforce and monitor motorized vehicle use.
6051	SC105	Let the public work with you so they know it is truly a part of their land and resources. This would also boost the economy of the areas around the wild horse range.
6051	SC123	Strengthen law enforcement to prevent more vandalism and theft of cultural resources. One suggestion is to get volunteer help to manage the 17 mile shooting range and Shepherd Ah Nei ORV area, so law enforcement will be released to protecting other areas including cultural sites.
6051	SC109	Provide a plan to enforce and monitor motorized vehicle use.
6051	SC128	Prior to implementing oil and gas stipulations, BLM should conduct a complete cost/benefit analysis of the stipulation, conduct a thorough data review on the proposed stipulations, and adapt a monitoring program tracking the effectiveness of the stipulations.
6052	SC093	Public land resource will be protected because the resource will be most important, that is the whole idea of managing a resource. Public land users will benefit now by having better places to recreate, and in the future because the public lands will be better maintained and still available for everyone to enjoy.

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
6052	SC100	I believe working with lessees of BLM to enhance the environment/water development/fencing/weed control, would be huge for grazing/wildlife, all outdoor activities. Also changing traditional uses would be very detrimental to the health of the land.
6052	SC101	The concept as it has been sold to the public, is that a mix of grass roots user concerns will be woven into a rug that provides for responsible resource uses and that the local and regional economies will benefit.
6052	SC102	I believe that in the long-term, the public, the actual owners of public land, will be better served, and the land certainly better protected, if more emphasis is put on recreation use, and tourism, than the disproportional use and exploitation of special interest industries. Between tax breaks, subsidies, EPA clean-ups, and corruption, not to mention the damage to the land and wildlife, this is not diversified or balanced use, let alone sustainable. We cannot exterminate all the wild horses, buffalo, wolves, coyotes, prairie dogs, sage grouse, etc., rangeland, national monuments, streams and rivers, forests, etc, all for the sake of cattle, mining, and gas and oil.

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
6052	SC056	The Environmental Protection Agency (EPA), Region 8, Montana Office has reviewed the May 15, 2008 Notice of Intent to prepare a Resource Management Plan (RMP) for the Bureau of Land Management (BLM) Billings Field Office and Pompeys Pillar National Monument and an associated Environmental Impact Statement (EIS). The EPA reviews EIS's accordance with its responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean' Air Act. Section 309 of the Clean Air Act directs EPA to review and comment in writing on the environmental impacts of any major Federal agency action. EPA's draft EIS comments will include a rating of both the environmental impact of the proposed action and the adequacy of analysis and disclosure in the NEPA document. We are enclosing a brief summary that explains EPA's DEIS rating' system. It is EPA's expectation that the Billings Field Office and Pompeys Pillar National Monument RMPs EIS fulfill the basic intent of NEPA, and encompass to the maximum extent possible the environmental and public involvement requirements of State and Federal laws, Executive Orders, and policies (e.g., Clean Water Act, Clean Air Act, Endangered Species Act, E.O.11990 Protection of Wetlands, etc.). EPA's primary interests are protection and restoration of water quality, riparian and aquatic habitats, groundwater quality, source water protection, wetlands and air quality. The EPA is particularly interested in seeing the RMPs and EIS disclose: -the existing conditions for all environmental resources and the specification of gaps in current knowledge; -the BLM's desired conditions to assure sustainability of environmental resources; - identification of areas not currently meeting desired conditions; -a specific set of goals and objectives to guide future actions toward achievement of the desired conditions; --Best Management Practices (BMPs) for water quality protection; protection of riparian areas and wetlands; reduced water quality, fisheries, and wildlife impacts from roads; and maintenance and restoration of watershed health to achieve water quality that fully supports beneficial uses of surface waters in cooperation with State EPA Total Maximum Daily Load (TMDL) development and implementation efforts; and a commitment to monitoring for determining the extent to which the RMP will achieve goals and objectives and to assure that BMPs are effective.
6053	SC028	These populations and communities can be protected by restricting off-road vehicle use as well as oil and gas development in much but not all of the BLM land in the area.
6053	SC028	BLM policies should discourage residential development in the foothills of the Beartooth and gas development and mining on the fringe of the Pryor Range. In short, the Northern Bighorn Basin has many significant biological values that should be protected.

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
6053	SC028	The Wild Horse Range has large areas of highly erodible soils because of the steep, poorly vegetated slopes. Several rare plants occur in this area. Special management of ORV use and horse trampling is needed in order to protect the biological values of this area. Southern toeslopes of the Pryor Range and small included valleys harbor populations of rare plants and endemic plant communities. This area should be considered for special designation.
6053	SC028	I believe that the management plan should provide direction that will protect biological and recreational values (hunting) by discouraging residential development on private wildlands adjacent to public land.
6053	SC051	Very little respect by the public for the land and for the lessee. Little regard for boundary between public and private land. Trash left everywhere, refusal to say on roads, especially if wet, fences cut, gates left open, etc.
6053	SC053	The current boom in oil and gas development and the attendant management challenges make it critical that the BLM use the best available tools to minimize impacts to valuable public land resources such as wildlife habitat, clean air and water, cultural resources, and lands with wilderness character.
6053	SC053	Conduct landscape-scale analyses to evaluate impacts and provide sound ecological protection for a landscape's wildlife, habitat, and other ecological resources.
6053	SC093	Public land resource will be protected because the resource will be most important, that is the whole idea of managing a resource. Public land users will benefit now by having better places to recreate, and in the future because the public lands will be better maintained and still available for everyone to enjoy.
6053	SC099	Areas and trails shall be located to minimize damage to soil, watershed, vegetation, air, or other resources of the public lands, and to prevent impairment of wilderness suitability (43 CFR § 8342). Areas and trails shall be located to minimize harassment of wildlife or significant disruption of wildlife habitats. Special attention will be given to protect endangered or threatened species and their habitats (43 CFR § 8342).
6053	SC107	Unmanaged motorized recreation and conflict between motorized and nonmotorized recreationists. The RMP must protect wildlife habitat, botanical resources, cultural resources, and quiet recreation from the encroachment and expansion of motorized recreation. A road inventory should be done to determine if roads and tracts were legally created. All user created roads are illegal until each has been considered for designation in accordance with 43 CFR §8342. All motorized vehicles and drivers on public land should be licensed and street legal for the safety of all involved. The plan should provide a plan for enforcement.

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
6053	SC116	The current boom in oil and gas development and the attendant management challenges make it critical that the BLM use the best available tools to minimize impacts to valuable public land resources such as wildlife habitat, clean air and water, cultural resources, and lands with wilderness character.
6053	SC119	Abuse of land-trash, driving off roads, dangerous shooting, shooting water tanks, cutting gates, fences. Foot traffic only, no motorized vehicles, better education of public on use of public lands, better respect for environment, better policing and control use of public land.
6053	SC123	Strengthen all stipulations for oil, gas, coal, and coal bed methane leases to protect cultural and historic resources in exploration and mineral development areas.
6053	SC123	Strengthen law enforcement to prevent more vandalism and theft of cultural resources. One suggestion is to get volunteer help to manage the 17 mile shooting range and Shepherd Ah Nei ORV area, so law enforcement will be released to protecting other areas including cultural sites.
6053	SC056	The Environmental Protection Agency (EPA), Region 8, Montana Office has reviewed the May 15, 2008 Notice of Intent to prepare a Resource Management Plan (RMP) for the Bureau of Land Management (BLM) Billings Field Office and Pompeys Pillar National Monument and an associated Environmental Impact Statement (EIS). The EPA reviews EIS's accordance with its responsibilities under the National Environmental Policy Act (NEP A) and Section 309 of the Clean' Air Act. Section 309 of the Clean Air Act directs EPA to review and comment in writing on the environmental impacts of any major Federal agency action. EPA's draft EIS comments will include a rating of both the environmental impact of the proposed action and the adequacy of analysis and disclosure in the NEPA document. We are enclosing a brief summary that explains EPA's DEIS rating' system. It is EPA's expectation that the Billings Field Office and Pompeys Pillar National Monument RMPs EIS fulfill the basic intent of NEPA, and encompass to the maximum extent possible the environmental and public involvement requirements of State and Federal laws, Executive Orders, and policies (e.g., Clean Water Act, Clean Air Act, Endangered Species Act, E.O. 11990 Protection of Wetlands, etc.). EPA's primary interests are protection and restoration of water quality, riparian and aquatic habitats, groundwater quality, source water protection, wetlands and air quality. The EPA is particularly interested in seeing the RMPs and EIS disclose: -the existing conditions for all environmental resources and the specification of gaps in current knowledge; -the BLM's desired conditions to assure sustainability of environmental resources; - identification of areas not currently meeting desired conditions; -a specific set of goals and objectives to guide future actions toward achievement of the desired conditions; --Best Management Practices (BMPs) for water quality protection; protection of riparian areas and

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		wetlands; reduced water quality, fisheries, and wildlife impacts from roads; and maintenance and restoration of watershed health to achieve water quality that fully supports beneficial uses of surface waters in cooperation with State EPA Total Maximum Daily Load (TMDL) development and implementation efforts; and -a commitment to monitoring for determining the extent to which the RMP will achieve goals and objectives and to assure that BMPs are effective.
6053	SC109	Areas and trails shall be located to minimize damage to soil, watershed, vegetation, air, or other resources of the public lands, and to prevent impairment of wilderness suitability (43 CFR § 8342). Areas and trails shall be located to minimize harassment of wildlife or significant disruption of wildlife habitats. Special attention will be given to protect endangered or threatened species and their habitats (43 CFR § 8342).
6053	SC125	BLM has done a good job of closing roads in the South Pryor Desert and PMWHR with signs and barricades. However as ATV traffic increases we expect to see more cross-country travel. The Billings Field Office law enforcement officer has done made an admirable effort to organize a Citizen's Watch, but that not been successful. Some arrangement needs to be made to better monitor and enforce rules prohibiting off-road travel. One law enforcement officer for the Billings Resource Area can not do it all.
6054	SC094	The RMP should explain how the public will be informed about the leasing of BLM land for oil and gas drilling. It should also explain how the BLM will determine whether an area is appropriate for oil and gas drilling. Finally, if it is determined that an area is appropriate to lease for oil and gas drilling, the RMP should explain what kind of stipulations will be placed on leases to limit the damage and restore the area to a more natural setting.
6054	SC099	Are there reservoirs where it might be beneficial to have them breached as a means to restoring historic prairie streams?
6054	SC107	Motorized recreation should be prohibited from special designated areas to protect the resources. The RMP should specify how corrective actions will be taken to restore areas where needed. The RMP should authorize inventories to identify other possible areas for special designation and protection.
6054	SC117	The RMP should explain how the public will be informed about the leasing of BLM land for oil and gas drilling. It should also explain how the BLM will determine whether an area is appropriate for oil and gas drilling. Finally, if it is determined that an area is appropriate to lease for oil and gas drilling the RMP should explain what kind of stipulations will be placed on leases to limit the damage and restore the area to a more natural setting.

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
6054	SC109	Are there reservoirs where it might be beneficial to have them breached as a means to restoring historic prairie streams?
6055	SC099	Multiple use should not be construed to mean that all uses must be allowed in all places. Multiple use is a combination of balanced and diverse resources used over a large landscape that takes into account the long-term needs of future generations, including, but not limited to, recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific and historic values. Multiple use allows for future but as yet unknown or currently undervalued uses that arise from changing needs and conditions. Wilderness is included in the multiple use doctrine.
6055	SC099	Multiple use also should not be construed to mean that extractive uses are preferred over other uses. The BLM cannot authorize a particular use based purely on the contribution of that use to the economy.
6055	SC099	Multiple use does mean the use of some land for less than all of the resources. The BLM can exclude non-beneficial, incompatible, and environmentally adverse uses of resources and bundle together complementary, conservation-oriented uses.

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
6055	SC099	<p>What recreational opportunities will be provided for traditional hunters, hikers, or horseback riders seeking a more remote, primitive, quiet, and non-motorized experience? The evidence that motorized vehicle traffic conflicts with other uses is overwhelming. As levels of traffic rise, it becomes a dominant use, displacing traditional nonmotorized use. The DOI long ago recognized that adding off-road vehicle traffic subtracts from natural integrity, thereby displacing traditional backcountry visitors: "Any substantial ORV presence in a backcountry area tends to displace tranquility seeking visitors and preclude their further use of the area. " (DOI, Final EIS, Departmental Implementation of EO 11644, 1978) This conclusion has been substantiated -repeatedly-- by recreational research: The 1994 MT Trail Users Study found that 84% of equestrians and 89% of Montana hikers find off-road vehicles to be incompatible trail uses. Nearly three out of four Montanans (74%) who cross-country ski will avoid areas with snowmobile traffic. (MT Trail Users Study, ITRR UofM, 1994). In a 1997 survey, two-thirds of Idaho residents oppose the use of motorized off-road vehicles such as ATVs and motorcycles in areas closed to cars and trucks. 70% would support restrictions on the use of motorized vehicles off roads during hunting seasons in large geographic areas such as watersheds or entire game management units. (Access and Off-Road Vehicle Mgmt, Idaho Public Policy Survey, Scudder, 1997). A 1998 survey by the Montana Hunter Behavior Council found: " Widespread concern about the use of ATVs and their negative impact on the sport of hunting is evident throughout the survey findings ..." What measures will be taken to avoid user conflict? Conflicts between motorized and non-motorized users are best minimized by creating large blocks of land for motorized use and large blocks for non-motorized use. With the passage of the Multiple Use Sustained Yield Act it has long been recognized that some uses are incompatible with others and that over a larger landscape uses should be separated with some uses managed to a lesser extent than others. Areas and trails shall be located to minimize conflicts between off-road vehicle use and other existing or proposed recreational uses of the same or neighboring public lands ... (43 CFR § 8342). How will the new RMP, including OHV management and travel planning, comply with the Federal Regulations (43 CFR 8342.1 and 8342.2, codifying Executive Orders 11644 and 11989, that instruct BLM on OHV management?</p>
6055	SC109	<p>Multiple use should not be construed to mean that all uses must be allowed in all places. Multiple use is a combination of balanced and diverse resources used over a large landscape that takes into account the long-term needs of future generations, including, but not limited to, recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific and historic values. Multiple use allows for future but as yet unknown or currently undervalued uses that arise from changing needs and conditions. Wilderness is included in the multiple use doctrine.</p>

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<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Billings RMP)</i>
6055	SC127	Leave these lands open to all users. It's multiple use for everybody.
6055	SC129	MPA believes that exploration and production of vital oil and gas minerals on all public lands that are not national park or designated wilderness is important in developing domestic energy supplies and is good public policy. Further, on public lands that are designated multiple use, oil and gas development should be encouraged and allowed.
6150	SC041	Public land need to be managed so that the public can enjoy it without harm to the environment while at the same time using the land without abusing it.
7000	SC004	There should be a requirement to notify any lessee of BLM land, etc that a person/persons will be on that BLM land. Since the lessee is responsible for the care of the BLM land, it would be beneficial to all for the lessee to know who is using the leased property besides himself. This includes all recreationists.
7000	SC009	Public pay little attention to no trespass signs or signs limiting access across private land. Landowner does need to limit public use of private property to reach public land.
7000	SC009	High no trespass fines for violations.
7000	SC009	Montana is now one-third public land.
7000	SC009	Many landowners would allow some trespass across private land to reach public land if there was strict limits on control of and ID of anyone carrying a permit to trespass across private land, limit of who, where and when, strict and high fines for violations.
7000	SC013	Clearly marking BLM boundaries so users would be less likely to encroach on private land.
7000	SC014	Volunteer trail maintenance/adoption.
7000	SC052	I am inquiring about the land that will be opened up in September near Pompeys Pillar. Where is the site? Will it be open to hunting and camping...?
7000	SC123	Mouth of the Bighorn River where it enters the Yellowstone River, and area of important national history, significant for the reason that this was where the first fur trading post was established to trade with the Crow Indians and other Yellowstone tribes.

Pompeys Pillar National Monument RMP Scoping Comments

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Pompeys Pillar National Monument RMP)</i>
1100	SC045	My sister and I enjoyed a visit to Pompeys Pillar a coupled of years ago. We were surprised that protection for the historic aspects of it seemed minimal. My choice for a plan would be to preserve the wild character of the surrounding area and develop unobtrusive protection for the rock with the signatures and dates. No Disneyland on the river, please.
1100	SC123	Custer 1873 Battlefield across from Pompeys Pillar and the view shed across the river and to the west.
1100	SC104	There is a no-dig cultural area between the parking lot and the Interpretive Center. We need to enlist an archeological team to investigate the site with the goal of either building a display that results from the findings or landscaping the area to fit with the rest of the Pillar.
1100	SC104	Obtain an historic easement of the property around the Pillar on both sides of the river so the Pillar can retain its historic setting. There have been many complaints concerning the construction of the grain elevator south of the Monument. There was little that could be done about it because neither the BLM nor the PPHA had any legal standing concerning the land around the Monument. The BLM needs to obtain historic or cultural easement to the adjacent property, including that north of the river, to preserve as much of the authentic historic view as possible.
1150	SC104	Take out all Russian olive trees on the Monument and adjacent BLM property. Russian olives are not native trees. They have a tendency to choke out cottonwood trees and eventually change the entire riparian environment. The Monument is a premier bird watching area. We must ensure the native environment survives.
1400	SC104	We must reduce the impact of the old road and parking lot. There is continued need for motorized access to the area between the Pillar and the river, but the old road may not be it. The old parking lot needs to be reduced in size or eliminated altogether. It could be used to extend the native grass area. The log cabin could be moved to the south part of the parking lot, for example.
1400	SC104	Take out all Russian olive trees on the Monument and adjacent BLM property. Russian olives are not native trees. They have a tendency to choke out cottonwood trees and eventually change the entire riparian environment. The Monument is a premier bird watching area. We must ensure the native environment survives.
1500	SC025	Listen to the public and follow the flood plain rules everyone else has to follow.

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Pompeys Pillar National Monument RMP)</i>
2000	SC047	I hope the management plan for Pompeys area will consider that commercial interests do not appear to be compatible with the site nor with any of the other interests.
2100	SC104	Obtain an historic easement of the property around the Pillar on both sides of the river so the Pillar can retain its historic setting. There have been many complaints concerning the construction of the grain elevator south of the Monument. There was little that could be done about it because neither the BLM nor the PPHA had any legal standing concerning the land around the Monument. The BLM needs to obtain historic or cultural easement to the adjacent property, including that north of the river, to preserve as much of the authentic historic view as possible.
2100	SC104	Purchase land between the Monument and the Bundy Road. This land will allow a different road to be built into the area between the Pillar and the river. It will also allow us to build a path from the Pillar area to the old Bundy Bridge as mentioned below. This land will provide us with options we presently don't have.
2250	SC047	I hope the management plan for Pompeys area will consider that commercial interests do not appear to be compatible with the site nor with any of the other interests.
2250	SC104	Contract with a concessionaire to provide food for visitors. There are little to no food resources at or near the Monument. Many guests ask where they can get something to eat. Options need to be investigated.
2251	SC104	Establish a camping area of about ten campsites on or near the Monument. There is little camping along the Yellowstone River in the area of the Monument. A campground will add a new dimension to the monument. It will become more of a destination site, providing an opportunity for families to enjoy outdoor history together. The PPHA and BLM will be able to design a viable evening "fireside" interpretive program for these folks and others who might attend.
2252	SC104	Obtain an historic easement of the property around the Pillar on both sides of the river so the Pillar can retain its historic setting. There have been many complaints concerning the construction of the grain elevator south of the Monument. There was little that could be done about it because neither the BLM nor the PPHA had any legal standing concerning the land around the Monument. The BLM needs to obtain historic or cultural easement to the adjacent property, including that north of the river, to preserve as much of the authentic historic view as possible.
2252	SC123	Custer 1873 Battlefield across from Pompeys Pillar and the view shed across the river and to the west.
2256	SC104	PPHA supports reasonable entrance fees to the Monument.

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Pompeys Pillar National Monument RMP)</i>
2300	SC104	We must reduce the impact of the old road and parking lot. There is continued need for motorized access to the area between the Pillar and the river, but the old road may not be it. The old parking lot needs to be reduced in size or eliminated altogether. It could be used to extend the native grass area. The log cabin could be moved to the south part of the parking lot, for example.
5050	SC024	I believe there has been enough money spent on the Pompeys Pillar rock! I would suggest waiting before any more is spent to see if it is feasible. With gas prices high and going up, people will have to conserve and cut down on their traveling.
5050	SC097	I don't put too big an issue on Pompeys Pillar and spending a lot of money on it.
5050	SC104	Make a deliberate effort to survey various age groups; i. e. children, young adults, middle-aged adults, senior citizens; regarding their suggestions about the Monument and include the findings in the Resource Management Plan. We may pick up some very good ideas from citizens who would otherwise not participate in the program.
5050	SC104	PPHA supports reasonable entrance fees to the Monument.
5100	SC104	Make a deliberate effort to survey various age groups; i. e. children, young adults, middle-aged adults, senior citizens; regarding their suggestions about the Monument and include the findings in the Resource Management Plan. We may pick up some very good ideas from citizens who would otherwise not participate in the program.
6000	SC003	Why only 51 acres? What of the rest of the BLM original purchase in '91?
6000	SC093	I am glad to see the RMP will include Pompeys Pillar.
6050	SC104	The primary recommendation by the Pompeys Pillar Historical Association regarding the management of the Pompeys Pillar National Monument is that the Monument and the contiguous BLM acreage be managed as a single unit with the Monument given the highest priority in the decision making process. The long-range goal is to include the contiguous acreage as part of the Monument.
6053	SC045	My sister and I enjoyed a visit to Pompeys Pillar a coupled of years ago. We were surprised that protection for the historic aspects of it seemed minimal. My choice for a plan would be to preserve the wild character of the surrounding area and develop unobtrusive protection for the rock with the signatures and dates. No Disneyland on the river, please.

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6053	SC047	I hope the management plan for Pompeys area will consider that commercial interests do not appear to be compatible with the site nor with any of the other interests.
7000	SC104	There has been discussion about what to do with the cabin, the old visitor's center. It is currently being used as a meeting room. The function of the cabin should be expanded to be used as a presentation center. This should include facilities for computer presentations. The cabin should not be moved until a similar facility can be added to the Interpretive Center.
7000	SC104	Develop a nature trail around the Pillar and along the Yellowstone River with interpretive signs along the way. The terrain on the Monument varies from riparian to short grass prairie to rock/cliff dwelling. Visitors living east of the 100 degrees longitude live in tall grass prairie or deciduous forest and are unfamiliar with short grass prairie. We have planted a large area in native grasses and forbs that should be expanded as time goes on. A paved nature trail through the short grass prairie, around the Pillar and along the river will provide an added dimension to the visitor experience. The trail should be paved for wheel chair accessibility and be marked with interpretive signs.
7000	SC104	Raze the farm buildings that lie west of the entrance road. As a visitor comes down the entrance road toward the parking lot, there are three outbuildings and a collapsed roof of a fourth. They partially block the view of the interpretive center. These buildings should be removed to improve the view of the Monument.
7000	SC104	Move the picnic area east so it lies adjacent to the parking area. The present picnic area is adjacent to the old parking lot, but is quite a distance from the new parking lot. Visitors often suggest that picnic tables be installed near the new parking lot so it is easier to move victuals from their cars when they want to dine at the Monument.
7000	SC104	Install permanent picnic shelters that resemble a tepee village. The Pompeys Pillar Historical Association, in cooperation with the BLM, is currently planning the installation of a Crow encampment including a tepee and interpretive signs. During the planning process the committee wanted to install four tepees, but decided a four-tepee installation would overwhelm the Interpretive Center. The plan was cut back to a single tepee. We would still like to portray a more sizeable and more realistic encampment. Picnic shelters designed as tepees will give that impression. Included in such a design could be a large pavilion area for groups modeled after the description in Clark's journals as he passed from present day Laurel to Billings, Montana. "this Lodge a council lodge, it is of a Conical form 60 feet diameter at its base built of 20 poles each pole 2 1/2' feet in Secumpheranc and 45 feet Long built in the form of a lodge & covered with bushes." Of course we would not want it covered with bushes, but we would want an interpretive sign explaining it.

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7000	SC104	Build two interpretive signs depicting what Clark saw from the top of the Pillar. One sign will be on the top of the Pillar, the other on the grounds below for visitors who cannot climb the rock. The sign will have two views, one to the north and one to the south. Each view will include Clark's description of what he saw from the top of the Pillar. A panoramic photo of the view to the north and another to the south, coupled with a key to point out what Clark saw, will help visitors experience what Clark experienced when he was atop the Pillar. A duplicate of this sign would be displayed below the Pillar for the benefit of those who can't climb the Rock.
7000	SC104	Rebuild the entire boardwalk. It is getting old and will need to be replaced soon.
7000	SC104	Modify the boardwalk so guests can see the Indian art of Father de Smet meeting with the Crow Tribe. There are descriptions of this Indian art, but the art is hidden by bushes. There may be other important inscriptions on the Pillar that no one ever sees. It would be a shame for these inscriptions and art to weather away with no one ever seeing them. This needs to be rectified when possible.
7000	SC104	Build a Library/Meeting Room as an addition to the Interpretive Center. Rationale: Such a room was part of the original plan for the Interpretive Center. It is still needed. There is a collection of books and artifacts from the Pillar that need to be stored and displayed. We also need more meeting room. There could be a goal of building the most complete library of Yellowstone Valley history in the area.
7000	SC104	When people pull into the Monument from the east, they tend to pull into a truck turn area for the grain elevator that is located on the opposite side of the access road. They then must pull back onto the access road for a short distance before turning into the Monument. These two turn-off areas should be joined for safety reasons so the visitors don't have to pull back on the access road.
7000	SC104	Create a path from the Pillar to the old Bundy Bridge so visitors can see the Pillar from the river as Clark may have seen it.
7000	SC104	Build a locker room and showers for the employees. Rangers often have to change from sweaty work cloths into uniforms to meet the public. They should have a place and an opportunity to clean up.

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7000	SC104	Put two piles of stones on top of the Pillar. From Clark's journals, "The Indians have made 2 piles of Stone on the top of this Tower." These stones are alleged to have been placed by Crow members during vision quests. This should be verified with the Crow elders. If this story bears out, we should work with the Crow tribe to replace these rocks. We anticipate this will involve a spiritual ceremony. Placement of these stones will bring the Pillar closer to what Clark saw, and will integrate the Crow view of the Pillar as a sacred site with the Clark story.
7000	SC104	Place an interpretive sign on the Pillar in front of "The Rock Where the Lion Lies." Present both views of the lion.
7000	SC104	Create a book of the Indian rock art and significant signatures on the Pillar. A few years ago a team headed by Linda A. Olson from Minot State University surveyed the Pillar and created a report entitled "Baseline Rock Art Documentation at Pompeys Pillar, 24YL 176." Historians should review this document and extract all Indian art and historically significant signatures and include them in a simplified book.
7000	SC104	Install more "brown" signage along the highways approaching the Monument. Signage on north-bound 1-90 prior to the 1-94 interchange, east-bound 1-94 just outside Billings, and west-bound 1-94 just outside Custer would do much to encourage tourists to visit the Monument.
7000	SC104	Create partnerships with other local agencies, such as the Western Heritage Center, Montana State University Billings, and Rocky Mountain College, to improve programming. Such partnerships can lend expertise and talent to Monument projects.
7000	SC104	BLM should make frequent press releases about activities and programs at the Monument. Many people in a 50-mile radius of the Monument know little or nothing of what programs and activities are available at the Monument. These activities should be accentuated with a weekly press release from the BLM.
7000	SC104	Create a new Monument brochure every three years. This will insure the brochure is current with regard to both programs and brochure design.
7000	SC104	Increase the orientation and training of rangers. We are aware that there is a great deal of training first year rangers must undergo to become productive in their work. There needs to be more emphasis on meeting the public and telling the story of the Pillar.

Subject Letter # Comment (Pompeys Pillar National Monument RMP)

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7000	SC104	Have an adequate number of rangers to accommodate visitors. Perhaps there should be one crew for maintenance and one crew for visitor contact; fee collection, interpretation, etc. As the functions at the Monument increase, so must the paid staff There is only one full time full time employee at the Monument. The use of so many seasonal employees guarantees high turn over and inefficiencies. This problem must be addressed.
7000	SC104	Review the length of the season for visitors. The Monument has increased the length of its season. We suggest there be a management review of attendance data and operational problems to determine if the season should be lengthened or reduced.
7000	SC104	Obtain security clearance for a number of PPHA volunteers to be able to access all monument buildings that involve store and interpretive activities. We all understand the need for increased security at the Monument. However, most of the volunteers in the store and in the docent corps have been at the Monument longer than most of the seasonal employees, yet they must rely on the employees to gain access to the storage area for the store and the cabin for presentations. We suggest that clearance be obtained for selected volunteers. We also suggest a surveillance camera be installed in the cabin so rangers don't have to be present while volunteers give presentations.
7000	SC104	Provide CPR training for all volunteers. We all hope CPR never needs to be used, but volunteers should be able to provide emergency care.
7000	SC104	Make a greater effort to increase local, state, national and international awareness of the Pompeys Pillar National Monument. The more awareness there is, the more visitors will come. Many of the suggestions being made by the PPHA will make the Monument more attractive to those on vacation as well as those who are looking for a day trip for the family.
7000	SC104	Work with the public schools to include Clark on the Yellowstone in the school curriculum. Children growing up in the Yellowstone valley should know of William Clark's exploration of the river, yet the topic is not a specific part of the curriculum. Steps should be taken to contact the local districts in an attempt to make Clark on the Yellowstone part of the curriculum.
7000	SC104	Work with local colleges and universities to create for-credit teacher education program around the Lewis and Clark Expedition that specifically includes Clark on the Yellowstone. The school visitation program at Fort Clatsop requires at least one teacher from a participating school to have attended a seminar to insure the children are properly prepared for their visit to the Fort. We do not think it is practical to go this far in our program, but we would like to provide teachers with an opportunity to attend on of our local colleges to receive college credit for studying the history of the Pillar.

<i>Subject Code</i>	<i>Letter #</i>	<i>Comment (Pompeys Pillar National Monument RMP)</i>
7000	SC104	Work to coordinate with other tourist attractions in the Yellowstone Valley. Some public agencies promoting tourism in the area tend to forget Pompeys Pillar as a day-trip site or a point of interest for tourists. Steps must be taken to change this attitude.
7000	SC104	Create adequate organized storage for PPHA. Keep the area clean and organized. The store and those setting up Clark Days activities need to have adequate, accessible storage available to them on site.
7000	SC104	Establish Pompeys Pillar National Monument as a destination site. Installation of a campground, increased evening programming, and increased awareness of the Monument will make Monument where visitors will want to stay for more than a couple hours.
7000	SC104	Membership in the PPHA should provide free admittance to the Monument. There are very few benefits that come with membership in the PPHA. The support the Association provides the Monument merits free entrance to members.
7000	SC104	There is a bill before Congress to eliminate fees at sites other than Park Service sites. The fees collected at the Pillar meet all the criteria outlined in the bill other than being a Park Service site. The PPHA supports amending the bill to allow the Pillar to continue collecting entrance fees.