





# PUBLIC COMMENTS APPENDIX

## INTRODUCTION

This appendix contains public and agency substantive comments received on the Draft RMP/EIS and the BLM's response. For more information, see Chapter 5 of the PRMP/FEIS.

**TABLE 1.  
SUBSTANTIVE COMMENTS AND BLM'S RESPONSE**

Comment Number	Comment Text from Draft RMP/EIS	Response to Comment from PRMP/FEIS
DR-MTDK-MC-13-0188-4	By changing the land to "No Surface Occupancy" on the BLM land that was acquired under the Bankhead-Jones Act, deprives Valley County of the opportunity to capitalize on the 6.25% royalty, that was part of the selling price when the land was sold to the United State Government in 1937. It could also have far reaching effects on the roads that cross this property, as well as the public utilities and easements that cross these lands.	A lease stipulation is a condition of lease issuance that provides a level of protection for other resource values or land uses by restricting lease operations during certain times or at certain locations or by mitigating unacceptable impacts, to an extent greater than standard lease terms or conditions. Lease stipulations further implement the BLM's regulatory authority to protect resources or resource values. Impact analysis to the resources and resources uses from the proposed action is conducted in accordance to NEPA in the PRMP/FEIS.
DR-MTDK-MC-13-0171-12	How will existing oil/gas pipelines be managed as the energy industry grows in these areas? How will new pipelines, power lines, compressor stations, pump stations and other associate facilities be managed so these habitats are not degraded?	After the ROD is issued, all proposed actions must meet the goals and objectives for resources in the RMP.
DR-MTDK-MC-13-0176-6	Strawberry Hill Recreation Area. This recreation area has seen a three-fourfold increase in use over the last ten years. Users include hikers, runners, mountain bikers, equestrians, picnickers, ATV users, cross-country skiers etc. The increase and diverse use of this site has developed a safety issue regarding "target shooting". Currently there is no designated shooting area. Develop or designate a safe area to restrict shooting or eliminate shooting with the exception of hunting during a licensed season by a licensed hunter.	After the ROD is issued, a Recreation Plan would be done for the area where the BLM would consider proposing the designation of shooting areas or the elimination of shooting with the exception of hunting during a licensed season. Planning will take place with public input during implementation planning for the Strawberry Hill Recreation Area.
DR-MTDK-MC-13-0146-20	Pg. 2-101, Action 6. How often would the Rogers Allotment mentioned in Action 6 be grazed and at what season? I would like to see the words, Dormant season grazing would be considered, added here. Grazing when cheatgrass is green and trees have not yet leafed out would be of great value 2 out of 3 years. Also, fall grazing after the first hard frost in alternate years could be beneficial.	After the ROD is issued, season of use will be considered when an implementation plan is prepared with public input.
DR-MTDK-MC-13-	Will wildlife (all species) be included and given priority in any vegetative community management decisions?	Consideration of a wildlife species is included in any proposed management decision, particularly Special Status Species.

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0171-4		
DR-MTDK-MC-13-0177-12	The BLM had a duty to consult with local governments regarding historic property. 16 U.S.C. § 470. The BLM failed to comply with its legal duty.	At the outset of the RMP planning process the BLM invited entities of federal, tribal, state and county governments to collaborate with the BLM on the development of the Draft RMP/EIS by becoming cooperating agencies. The cooperating agencies provided input in the development of the Draft RMP/EIS. See Chapter 5 for more details on the consultation process.
DR-MTDK-MC-13-0177-14	The BLM had a duty to respect the roles of state, local and tribal governments, to seek input and to harmonize the federal action with the local governments. Executive Order 12866. The BLM failed to comply with its legal duty.	At the outset of the RMP planning process the BLM invited entities of federal, tribal, state and county governments to collaborate with the BLM on the development of the Draft RMP/EIS by becoming cooperating agencies. The cooperating agencies provided input in the development of the Draft RMP/EIS. See Chapter 5 for more details on the consultation process.
DR-MTDK-MC-13-0177-4	BLM had a duty to cooperate with State and local governments to the fullest extent possible. 40 C.F.R. § 1506.2. The BLM failed to comply its legal duty in particular by denying the local governments' request for additional time for public comment and by not following required process and policies to incorporate the necessary information and analysis.	At the outset of the RMP planning process the BLM invited entities of federal, tribal, state and county governments to collaborate with the BLM on the development of the Draft RMP/EIS by becoming cooperating agencies. The cooperating agencies provided input in the development of the Draft RMP/EIS. See Chapter 5 for more details on the consultation process.
DR-MTDK-MC-13-0177-7	The BLM had a duty to cooperate with the local conservation districts. 16 U.S.C. § 2003. The BLM failed to comply with its legal duty.	At the outset of the RMP planning process the BLM invited entities of federal, tribal, state and county governments to collaborate with the BLM on the development of the Draft RMP/EIS by becoming cooperating agencies. The cooperating agencies provided input in the development of the Draft RMP/EIS. See Chapter 5 for more details on the consultation process.
DR-MTDK-MC-13-0177-8	The BLM had a duty to coordinate the Draft RMP/EIS planning with local governments. 43 U.S.C.A. § 1712. The BLM failed to comply with its legal duty.	At the outset of the RMP planning process the BLM invited entities of federal, tribal, state and county governments to collaborate with the BLM on the development of the Draft RMP/EIS by becoming cooperating agencies. The cooperating agencies provided input in the development of the Draft RMP/EIS. See Chapter 5 for more details on the consultation process.
DR-MTDK-	The BLM had a duty to consider and preserve historic and cultural heritage. The BLM also was required to use all practicable important historic, cultural	At the outset of the RMP planning process the BLM invited entities of federal, tribal, state and county governments to

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MC-13-0177-9	and natural aspects of our national heritage and maintain an environment which supports diversity and variety of individual choice. 42 U.S.C.A. § 4331(b); 40 C.F.R. § 1502.S, 1502.16, 150S.27(b)(3)(8). The BLM failed to comply with its legal duty, by not incorporating this discussion and using the special expertise of local government in doing so.	collaborate with the BLM on the development of the Draft RMP/EIS by becoming cooperating agencies pursuant to the requirements of NEPA and its implementing regulations. The cooperating agencies provided input in the development of the Draft RMP/EIS. See Chapter 5 for more details on the consultation process.
DR-MTDK-MC-13-0049-2	In order to facilitate our review of the planning documents, we request a copy of the Shape Files BLM has compiled during the planning process that depict where all oil and gas lease stipulations and restrictions would be applied by alternative. This information will significantly aid in our comprehensive review of the proposed RMP.	Available Draft RMP/EIS shapefiles may be accessed via the RMP webpage: <a href="http://www.blm.gov/mt/st/en/fo/miles_city_field_office/rmp.html">http://www.blm.gov/mt/st/en/fo/miles_city_field_office/rmp.html</a>
DR-MTDK-MC-13-0142-12	Would “best available data” be comprised of studies and information conducted on BLM-administered land only or would information collected on other private, state, or federally-administered land (through other single or cooperative public or private efforts) be pooled so that a broader analysis of the success or failure of habitat mitigation could be conducted?	Best available data can include data from any credible entity as determined by BLM specialists.
DR-MTDK-MC-13-0104-2	BLM also failed to comply with the Energy Policy and Conservation Act requirements to use the least restrictive stipulations necessary for oil and gas exploration and development activities.	BLM included an examination of least restrictive measures that would still protect the resource within the range of alternatives in the RMP/EIS. To the degree possible, the proposed alternative (E) includes the least restrictive measures while still meeting BLM's obligations to protect other resources as dictated by law and policy.
DR-MTDK-MC-13-0121-5	Compensatory mitigation directly conflicts with EPCA language which requires BLM to evaluate the extent and nature of any restrictions or impediments to the development of resources.	BLM included an examination of least restrictive measures that would still protect the resource within the range of alternatives in the RMP/EIS. To the degree possible, the proposed action includes the least restrictive measures while still meeting BLM's obligations to protect other resources as dictated by law and policy.
DR-MTDK-MC-13-0151-2	Chapter 2, pg. 49, Action 23 states existing structural improvements would be evaluated and may need to be removed, modified or marked. Who evaluates these structures? If these fences are moved grazing permits need changes, livestock water is a concern and access may be affected.	Dependent on location of structure, evaluation could occur by the BLM or project proponent. Also, see Chapter 2; Comparison of Alternatives Table 2-5; Fish, Aquatic and Wildlife Habitat, Including Special Status Species section for revisions.
DR-MTDK-MC-13-0169-20	Careful review of the various alternatives reveals there are very few differences between the various options. All alternatives, for instance, set aside large areas for oil and gas development with many of the same lease stipulations and conditions of approval. Every alternative with the exception of Alternative B, opens up 5.4 million acres for oil and gas. And, Alternative B “ which is supposed to be the most environmentally friendly alternative “ designates 3.3	Five alternatives are presented in Chapter 2 of the PRMP/FEIS for managing the MCFO, to meet the purpose and need for doing the plan and management goals, and to address the issues discussed in Chapter 1.

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	million acres as open for oil and gas development. Notably, none of the alternatives explore various conditions of approval for existing and future leases. Nor do the alternatives explore various ways to provide protections and mitigation for wildlife during the leasing or permitting process, i.e., incentives to protect large blocks of undeveloped land for wildlife habitat and wilderness values, clustering development, using timing restrictions and limitations (either as a lease stipulation or at the time of permitted), and incorporating detailed reclamation plans. A one-size-fits all approach to oil and gas development is not a reasonable range of alternatives.	
DR-MTDK-MC-13-0098-11	BLM has proposed monitoring based-mitigation measures in which monitoring data may trigger enhanced mitigation measures that are beyond Best Available Control Technology (BACT) and New Source Performance Standards. Under CAA authority, DEQ is required to take into account environmental benefit and economic and technical feasibility prior to requiring similar measures.	If monitoring-based measures are needed to address air quality concerns, the BLM will work closely with MDEQ to identify mitigation measures that can be applied under the CAA to federally authorized and non-federally authorized oil and gas activity. In some cases, where MDEQ does not have sufficient legal authority to implement needed mitigation measures, the BLM may impose mitigation measures on BLM-authorized activities only.
DR-MTDK-MC-13-0134-13	In BLM's Alternatives section of the Miles City RMP, one coal management plan is common to all alternatives (pg. 2-81). BLM opts, under Action 3, to carry forward all areas identified in past RMPs as acceptable for further consideration for leasing. Rather than extending a determination made in 1985, BLM needs to reassess lands these lands up for consideration. Surface ownership has changed, as have wildlife populations, not to mention individual water users and the constraints placed upon water resources. BLM needs to take a hard look at where coal leasing may not be in the regional or national interest.	In accordance with 43 CFR 3420.1-5, BLM must hold a public hearing on the proposed land use plan or land use analysis if it involves the potential for coal leasing if such a hearing is requested by any person who is or may be adversely affected by adoption of the plan. Additional environmental analysis in accordance with NEPA and the coal leasing regulations would be conducted in response to leasing requests. The coal screening process would be re-evaluated and re-applied as necessary during the site-specific NEPA analysis in response to new data or changes in resources or conditions that have occurred since the original coal planning was conducted. Also, 43 CFR 3425.4 requires BLM to hold a public hearing on the environmental assessment or environmental impact statement prepared for a lease sale application prior to conducting the lease sale. See the Minerals Appendix for more explanation.
DR-MTDK-MC-13-0108-14	BLM has not revisited the four coal screens identified in 43 C.F.R. § 3420.1-4 (coal development potential, unsuitability criteria, multiple land use decisions, and landowner consultation) for the Big Dry RMP area since 1996 and for the Powder River RMP area since 1985. Because some of the information to be considered during the screening process may have changed in the intervening years (including landowner consent), BLM should not treat areas that were	In accordance with 43 CFR 3420.1-5. BLM must hold a public hearing on the proposed land use plan or land use analysis if it involves the potential for coal leasing if such a hearing is requested by any person who is or may be adversely affected by adoption of the plan. Additional environmental analysis in accordance with NEPA and the coal leasing regulations would

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	<p>identified as not suitable under the 1996 and 1985 RMPs as automatically closed to leasing. Rather, as the Draft RMP notes, the coal screening process should be applied anew on a case-by-case basis to each individual coal lease application, regardless of the previous results of the screening process.</p>	<p>be conducted in response to leasing requests. The coal screening process would be re-evaluated and re-applied as necessary during the site-specific NEPA analysis in response to new data or changes in resources or conditions that have occurred since the original coal planning was conducted. Also, 43 CFR 3425.4 requires BLM to hold a public hearing on the environmental assessment or environmental impact statement prepared for a lease sale application prior to conducting the lease sale. See the Minerals Appendix for more explanation.</p>
<p>DR-MTDK-MC-13-0130-14</p>	<p>Federal coal may not be leased (or added to an existing lease through a Lease Modification) unless the lands containing the coal have been included in a comprehensive land use plan under the agency’s land use planning regulations, with opportunities for public review and comment, and subject to stipulations, guidelines or standards set out in the plan. The lands in question must have been found suitable for further consideration for leasing, including application of screens including the unsuitability criteria set out at Subpart 3461, other multiple land use decisions, and surface owner consultation. BLM must also hold a public hearing on the proposed plan if it involves the potential for coal leasing.</p>	<p>In accordance with 43 CFR 3420.1-5. BLM must hold a public hearing on the proposed land use plan or land use analysis if it involves the potential for coal leasing if such a hearing is requested by any person who is or may be adversely affected by adoption of the plan. Additional environmental analysis in accordance with NEPA and the coal leasing regulations would be conducted in response to leasing requests. The coal screening process would be re-evaluated and re-applied as necessary during the site-specific NEPA analysis in response to new data or changes in resources or conditions that have occurred since the original coal planning was conducted. Also, 43 CFR 3425.4 requires BLM to hold a public hearing on the environmental assessment or environmental impact statement prepared for a lease sale application prior to conducting the lease sale. See the Minerals Appendix for more explanation.</p>
<p>DR-MTDK-MC-13-0130-2</p>	<p>The Draft RMP carries forward land use planning decisions from previous resource management plans without new analysis or application of coal leasing screens as required by BLM’s coal management regulations.</p>	<p>In accordance with 43 CFR 3420.1-5. BLM must hold a public hearing on the proposed land use plan or land use analysis if it involves the potential for coal leasing if such a hearing is requested by any person who is or may be adversely affected by adoption of the plan. Additional environmental analysis in accordance with NEPA and the coal leasing regulations would be conducted in response to leasing requests. The coal screening process would be re-evaluated and re-applied as necessary during the site-specific NEPA analysis in response to new data or changes in resources or conditions that have occurred since the original coal planning was conducted. Also, 43 CFR 3425.4 requires BLM to hold a public hearing on the environmental assessment or environmental impact statement prepared for a lease sale application prior to conducting the lease sale. See the</p>

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DR-MTDK-MC-13-0134-12	Given the Northern Cheyenne reservation's Class I air quality standards, BLM needs to analyze the impacts of potential coal development on Northern Cheyenne air quality, and make new acceptability determinations. More broadly, in its analysis of Air Resources and Climate (Chapter 4, pg. 20), the Draft RMP states that coal mining is expected to continue at rates similar to those experienced in the past. This would seem to ignore the potential for large-scale new coal development at Otter Creek, as well as other new or expanded mine projects being considered. In seeking to assess future impacts on air quality, BLM needs to look at what increased coalmining at Otter Creek and elsewhere would mean, and change its overall leasing considerations accordingly.	Minerals Appendix for more explanation. In accordance with 43 CFR 3420.1-5. BLM must hold a public hearing on the proposed land use plan or land use analysis if it involves the potential for coal leasing if such a hearing is requested by any person who is or may be adversely affected by adoption of the plan. Additional environmental analysis in accordance with NEPA and the coal leasing regulations would be conducted in response to leasing requests. The coal screening process would be re-evaluated and re-applied as necessary during the site-specific NEPA analysis in response to new data or changes in resources or conditions that have occurred since the original coal planning was conducted. Also, 43 CFR 3425.4 requires BLM to hold a public hearing on the environmental assessment or environmental impact statement prepared for a lease sale application prior to conducting the lease sale. BLM considers the proposed Otter Creek Mine to be speculative at this time. Also, there is no Federal coal included in the proposed Otter Creek Mine. See the Minerals Appendix for more explanation.
DR-MTDK-MC-13-0123-5	Russian olive, an invasive tree especially on the Yellowstone and Big Horn rivers, is taking over riparian ecosystems, displacing native cottonwoods and willows. The BLM should work to restore riparian areas that are being taken over by Russian olive. If we lose cottonwood habitat along our rivers and streams, an important part of Montana's wildlife habitat will also be lost.	Management of Russian olive will be pursued on a project-specific basis to improve the health of riparian areas and wildlife habitat.
DR-MTDK-MC-13-0098-7	DEQ is concerned about the use of air quality modeling at the planning stage. Without project specific information several assumptions must be made to complete the modeling which results in a quantitative analysis based on assumptions rather than an informed scientific evaluation.	Modeling at the planning stage requires assumptions. However, the Air Quality Oil and Gas MOU requires modeling and/or mitigation for every future oil and gas EIS that may potentially have a significant impact on air quality or AQRVs.
DR-MTDK-MC-13-0121-57	Are the categories of Federal Mineral Estate and Oil and Gas Lease intended to represent the same classification?	No. Federal Mineral Estate refers to all leased and unleased federal minerals. Oil and Gas Leases refers only to the leased oil and gas minerals.
DR-MTDK-MC-13-0001-2	Reconsider the assessment of Wrangler Creek. The agency dropped the area from consideration as a land with wilderness characteristics because "you can see imprints of man (town of Broadus within 5 miles), so it is not considered outstanding." Whether an area has wilderness characteristics is determined by what is within the boundaries of the unit - not outside.	Per BLM Manual 6310, human impacts can be noted in the area description and evaluated for direct effects on the area. Sights and sounds from outside the inventory area can be considered if they are pervasive and omnipresent.
DR-	BLM apparently dropped a number of areas from LWC consideration due to	Per BLM Manual 6310, human impacts can be noted in the area

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MTDK-MC-13-0169-5	conditions that occur outside and away from the immediate area. BLM dropped Wrangler Creek from consideration as a land with wilderness characteristics because you can see imprints of man (town of Broadus within 5 miles) so it is not considered outstanding. But whether an area has wilderness characteristics is to be determined primarily by what exists within the boundaries of the unit - not outside.	description and evaluated for direct effects on the area. Sights and sounds from outside the inventory area can be considered if they are pervasive and omnipresent.
DR-MTDK-MC-13-0146-31	Pg. 2-119, Action 5. WSAs are more restrictive than limited OHV use. There are 50,000 plus acres of WSAs covered by this document that severely limit use.	Per BLM Manual 6330 - <i>Management of Wilderness Study Areas</i> , the use of motor vehicles or mechanical transport is restricted to those primitive routes in the WSA that are open to the general public. Also note, Congress has released the Buffalo Creek and Zook Creek WSAs from wilderness study. See Chapter 3, Wilderness, Wilderness Study Areas section for further discussion.
DR-MTDK-MC-13-0103-6	Please publish the Raptor Nest locations.	Raptor nest locations may be requested via the Montana Natural Heritage Program.
DR-MTDK-MC-13-0127-1	The current trends in recreational use in the planning area indicate a steady increase. And since demand for both motorized and non-motorized recreation access will likely continue to increase, 1a. Why is there a proposed reduction in OHV opportunities/acreage with the Short Pines OHV area and in general the RMP administered lands when the above statements indicate an increase will occur? More people using less acreage will certainly cause damage which will in turn cause a further agency reduction in opportunities for OHV use.	The BLM considered a range of alternatives for resource uses in the Miles City planning area, including, but not limited to OHV use. The PRMP/FEIS includes reductions in the acreage in the Short Pines because of access issues as explained in Chapter 4. The Record of Decision, anticipated to be issued in the summer of 2015, will generally explain the reasoning behind decisions regarding resource uses.
DR-MTDK-MC-13-0088-1	The Reasonably Foreseeable Development boundaries for the Spring Creek Mine in the Draft RMP (Map 75) reflect available information but those boundaries should be viewed as subject to subsequent updates and refinements.	RFD boundaries, acre figures and other numbers used in the analysis are approximate projections for comparison and analytic purposes only. Readers should not infer that they reflect exact measurements or precise calculations.
DR-MTDK-MC-13-0126-17	Pg. SPE-6. <i>Eriogonum visherii</i> is a native plant found only in a small area of the Dakotas and adjacent Montana. The best known population of this plant in Montana is on BLM lands administered by MCFO. This globally rare species should be included in the Powderville ACEC and protected from surface disturbances cause by mining or paleontological research.	See BLM Manual 6840 - Special Status Species Management, for the objectives for managing special status plants. The plant is a BLM sensitive species and is included within the proposed ACEC boundary. Upon issuance of the RMP ROD, proposed projects must meet the approved goals and objectives for managing special status plants. Restrictions limiting surface disturbing activities in the proposed ACEC will help protect the plant.
DR-MTDK-	Chapter 1 Table 1-1. The math used is in error.	See Chapter 1, Introduction, Table 1-1 for corrections.

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MC-13-0030-1		
DR-MTDK-MC-13-0089-29	In its NEPA analysis, BLM must address whether the development of resources, and in particular the development of oil and gas and coal, in the MCFO will affect any high quality waters or whether it will degrade any existing uses. BLM may not evade its NEPA duty to consider these impacts by asserting that other agencies may issue discharge permits. 40 C.F.R. § 1502.14(f), 1502.16(h).	See Chapter 1, Laws section. It specifies BLM must comply with the Clean Water Act, the Montana Water Quality Act, and the National Environmental Policy Act of 1969 (NEPA). The effects to water from BLM's proposed actions are found in Chapter 4, Water Resources section. The analysis of impacts to particular waterbodies from oil, gas, and coal development is considered during site-specific, or implementation planning. The Clean Water Act and the Montana Water Quality Act require that BLM actions protect the beneficial uses of Montana's waters and follow Montana's nondegradation policy. Individual actions will continue to be analyzed through the NEPA process on a case-by-case basis to ensure they comply with these and all other applicable regulations and policies.
DR-MTDK-MC-13-0089-31	The MCFO is obligated to consider impacts before it proceeds with authorization of additional coal mining on BLM lands. Not only is BLM MCFO mandated to follow antidegradation and water quality standards under the CWA and state law, but it must also take a NEPA hard look at any impacts that maybe related to these water quality standards as well.	See Chapter 1, Laws section. It specifies the BLM will comply with the Clean Water Act, the Montana Water Quality Act, and the National Environmental Policy Act of 1969. When site-specific leasing is proposed for coal mining and related activities, the potential impacts are analyzed through the NEPA process and mitigation measures are discussed and prescribed on a case-by-case basis in order to protect the beneficial uses of water resources. The requisite level of information necessary to make a reasoned choice among the alternatives in an EIS is based on the scope and nature of the proposed decisions. As the PRMP/FEIS analyzes land use planning-level decisions, which by their nature are broad in scope, the requisite level of data and information is more generalized in order to apply a wide-ranging landscape perspective. Although the BLM realizes that more data and more site-specific data could always be gathered, the baseline data used in the EIS provides the necessary basis to make informed land use plan-level decisions.
DR-MTDK-MC-13-0167-1	In the Executive Summary, Air Quality Related Values should be briefly discussed along with air quality.	See Chapter 1, Management Concerns, Air Resources section, which include AQRVs.
	BLM did not include fluid minerals as an issue or management concern in the planning process and instead oil and gas resources appear to be a secondary	See Chapter 1, Scoping and Issues, Issues Addressed section, Issue 8; Chapter 2, Comparison of Alternatives Table 2-5,

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	concern to all other resources. Oil and gas exploration and development is a very important resource and needs to be considered as such.	Minerals, Oil and Gas section; and the Minerals Appendix, Fluid Minerals section. Oil and gas management is considered throughout the RMP.
DR-MTDK-MC-13-0097-1	The Purpose and Need statement on Draft RMP pgs. 1-2 and the "Issues Addressed" on pgs. 1-4 through 1-7 are incomplete. Other than addressing the development of Master Leasing Plans, these sections are silent regarding energy development.	See Chapter 1, Scoping and Issues, Issues Addressed section, Issue 8; Chapter 2, Comparison of Alternatives Table 2-5, Minerals; Oil and Gas section; and the Minerals Appendix, Fluid Minerals section. Oil and gas management is considered throughout the RMP. The Purpose and Need statement for the RMP, which has been revised for the PRMP/FEIS, is broad and overarching to encompass many resources and resource uses, including energy development.
DR-MTDK-MC-13-0121-3	None of the seven planning issues address the concerns raised in our March 4, 2005 scoping letter, which called for oil and natural gas resources to be fully considered during this planning process.	See Chapter 1, Scoping and Issues, Issues Addressed section, Issue 8; Chapter 2, Comparison of Alternatives Table 2-5, Minerals; Oil and Gas section; and the Minerals Appendix, Fluid Minerals section. Oil and gas management is considered throughout the RMP.
DR-MTDK-MC-13-0126-1	Chapter 1, pg. 6, Issue 5 Left out the word "critical" in the second paragraph	See Chapter 1, Scoping and Issues, Issues Addressed section, Issue 5 for correction.
DR-MTDK-MC-13-0123-4	The Riparian and Wetland Areas section, and Fish and Wildlife/Aquatics section propose interrelated actions particularly with regards to surface-disturbing and disruptive activities, energy development, and buffers. It is unclear which actions will take precedence with the resulting impacts.	See Chapter 2, "How To Read Table 2-5." It states "if conflicting management actions are proposed for the same acreage (and the resources for that action are present) within an alternative, the most restrictive action would be implemented (unless a safety hazard was identified or the actions were to conflict with existing law and regulation)".
DR-MTDK-MC-13-0121-19	Pg. 2-122, Alternative E, Action 9 and pg. 4-359, Alternative E. BLM is inconsistent when describing how much acreage it would require to be avoided for ROW activities and must provide the correct figure.	See Chapter 2, "How To Read Table 2-5" for an explanation of the differences in acres in Chapters 2 and 4.
DR-MTDK-MC-13-0191-7	We did not find detailed discussion of, nor a proposed approach for, adaptive management application in the Draft RMP. The ability to adaptively manage and adjust action elements and conservation measures based on monitoring results is an extremely important component of Greater Sage-grouse conservation across the programs addressed in the RMP, and should be included in the Draft RMP.	See Chapter 2, Adaptive Management Strategy for GRSG Habitat Management section and the Greater Sage-Grouse (GRSG) Monitoring Framework Appendix for discussions on adaptive management based on monitoring.
DR-MTDK-	The Draft RMP/EIS declined to separately analyze the Sage-Grouse Recovery Alternative ( <a href="http://www.sagebrushsea.org/land_recovery_alternative.htm">www.sagebrushsea.org/land_recovery_alternative.htm</a> ), a	See Chapter 2, Alternatives Considered but Eliminated From Detailed Analysis, "Conservation Groups Alternative" for

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MC-13-0092-8	<p>management alternative submitted by conservation organizations to conserve and recover sage-grouse populations. The BLM contends that components of the recovery alternative were substantially considered in the range of other alternatives analyzed in the Draft RMP/EIS. The plan also indicates that sage-grouse best management practices appended to the Draft RMP/EIS include management prescriptions similar to those in the recovery alternative (Draft RMP/EIS: 2-9). Neither contention is correct. The Sage-Grouse Recovery Alternative, though based on the NTT report recommendations, makes additional and stronger management prescriptions for a number of land uses and related effects in sage-grouse range, including livestock grazing, vegetation management, invasive plants, fire and wind energy development. The recovery alternative also recommends including all active sage-grouse leks in priority habitat (which is a significantly larger area than MFWP core areas (4-170)). These recommendations were not analyzed together or individually in the Draft RMP/EIS. Moreover, given that sage-grouse populations will probably continue to decline under the Draft RMP/EIS "even under the conservation alternative (Alternative B) (4-169 " 4-170)"the BLM should analyze the complete Sage-Grouse Recovery Alternative as a possible strategy to conserve and restore sage-grouse populations and potentially preclude the need to list the species under the ESA.</p>	discussion on the alternative.
DR-MTDK-MC-13-0196-3	<p>The Draft RMP/EIS declined to separately analyze the Sage-Grouse Recovery Alternative (<a href="http://www.sagebrushsea.org/land_recovery_alternative.htm">www.sagebrushsea.org/land_recovery_alternative.htm</a>), a management alternative submitted by conservation organizations to conserve and recover sage-grouse populations. The plan contends that components of the recovery alternative were substantially considered in the range of other alternatives analyzed in the Draft RMP/EIS. The plan also indicates that sage-grouse best management practices appended to the Draft RMP/EIS include management prescriptions similar to those in the recovery alternative (Draft RMP/EIS: 2-9). Neither contention is correct. The Sage-Grouse Recovery Alternative, though based on the NTT report recommendations, makes additional and stronger management prescriptions for a number of land uses and related effects, including livestock grazing, vegetation management, invasive plants, fire management and wind energy development. The recovery alternative also recommends including all active sage-grouse leks in priority habitat (which is even more than MFWP core areas (4-170). These recommendations were not analyzed together or individually in the Draft RMP/EIS. Moreover, given that sage-grouse populations may continue to decline even under the conservation alternative (Alternative B) in the Draft</p>	See Chapter 2, Alternatives Considered but Eliminated From Detailed Analysis, "Conservation Groups Alternative" for discussion.

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	RMP/EIS (4-169 “ 4-170),the plan should analyze the complete Sage-Grouse Recovery Alternative as a possible strategy to conserve and restore sage-grouse populations and potentially preclude the need to list the species under the ESA.	
DR-MTDK-MC-13-0089-49	Air, Action 5: Methane emissions from proposed new or expanded coal mines would be estimated as part of project-level planning, and emission reduction measures would be considered. As stated, this Action is too conditional (would be considered) and too late in the BLM oil and gas development process.	See Chapter 2, Comparison of Alternatives Table 2-5, Air Resources and Climate section for revisions. The Action has been removed.
DR-MTDK-MC-13-0097-2	CO2 EOR should be added to the list of activities that would be prioritized by the BLM because CO2 EOR mitigates GHG emissions by permanently sequestering CO2. Draft EIS pg. 2-13: alter Action 6 to state: "Actions that reduced or mitigated GHG emissions by actions such as enhanced energy efficiency, use of lower GHG-emitting technologies, enhanced oil recovery operations using CO2 the capture or beneficial use of fugitive methane emissions would be prioritized."	See Chapter 2, Comparison of Alternatives Table 2-5, Air Resources and Climate section, Action 3 for additional text.
DR-MTDK-MC-13-0097-30	The EIS and RMP should support CO2 EOR because it is a technologically and economically feasible way to permanently sequester CO2 that would otherwise be vented to the atmosphere.	See Chapter 2, Comparison of Alternatives Table 2-5, Air Resources and Climate section, Action 3 for additional text.
DR-MTDK-MC-13-0051-2	Chapter 2, Alternatives, pg. 2-64, Action 7: Add National Historic Trails (NHTs) as a priority category for development of cultural resource management plans following issuance of a ROD. NHLs are listed twice as a priority category, so perhaps the intention was to include NHTs.	See Chapter 2, Comparison of Alternatives Table 2-5, Cultural Resources section. The statement has been deleted.
DR-MTDK-MC-13-0176-7	Development of federally owned minerals at Rosebud Battlefield, or within the view shed of the park would destroy the ambiance of the site that FWP is striving to preserve. Perhaps the BLM would consider withdrawing federally owned minerals from development consideration, exchange federally owned minerals in other areas of southeastern Montana or northern Wyoming for the privately owned minerals at the Rosebud Battlefield.	See Chapter 2, Comparison of Alternatives Table 2-5, Cultural Resources section. Under Alternative E, Action 3, the BLM proposes a No Surface Occupancy stipulation for historic battlefields. Also, see that section's goals for managing cultural resources.
DR-MTDK-MC-13-0191-14	Table 2-1, Greater Sage-grouse PPA Action 18. Permittee or Lessee monitoring may be acceptable, but only if they are qualified to conduct such monitoring. Language to that effect should be added, as should reference to required training.	See Chapter 2, Comparison of Alternatives Table 2-5, Fish, Aquatic and Wildlife Habitat, Including Special Status Species; GRSG Habitat – Priority Areas section. The statement has been removed .
DR-MTDK-MC-13-0171-3	How will sustainable forestry and range management (livestock grazing) be practiced and managed?	See Chapter 2, Comparison of Alternatives Table 2-5, Forestry and Woodland Products, and Livestock Grazing sections for BLM’s proposed actions. Meeting Standards for Rangeland Health provides for healthy, productive, and diverse native plant and animal populations and communities.
DR-	Do you have prescriptions for the management of noxious weeds?	See Chapter 2, Comparison of Alternatives Table 2-5, Invasive

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MTDK-MC-13-0171-5		Species section for proposed management of noxious weeds.
DR-MTDK-MC-13-0097-24	Are ROWs to be excluded on 45% or 80% of managed lands? Alternative E of the Draft RMP designates 1.3 million acres - or approximately 45% of managed lands as ROW "Avoidance" areas. See Draft RMP at pg. 1-121. Yet the Draft RMP states in Chapter 4 that, under Alternative E, ROWs would be avoided on "2.2 million of BLM administered acres in the planning area (80 percent)." Draft RMP at 4-359. Which number is correct?	See Chapter 2, Comparison of Alternatives Table 2-5, Lands and Realty, Rights-of-Way section for changes to the number of acres avoided under Alternative E. Also in Chapter 2, see the "How To Read Table 2-5" section for an explanation on the differences in acres between Chapters 2 and 4. As noted there, where acres are provided in Table 2-5, the data for that resource have been collected; where data are incomplete, an assumption is made regarding the acre numbers (and is found in the <i>Assumptions to the Analyses</i> section of Chapter 4).
DR-MTDK-MC-13-0030-2	Chapter 2 pg. 2-75 of Section 9 (Alternatives C, D & E). Closing a grazing allotment is in conflict with the goals listed in Chapter 1 pg. 1-9 of Vegetative Communities. This action is in conflict with Livestock Grazing Goals and Objectives in Chapter 2 pg. 2- 74, Table 2-1. Eliminating grazing has proven to increase invasive plants and weeds. Without grazing the BLM will be unable to properly manage vegetation communities.	See Chapter 2, Comparison of Alternatives Table 2-5, Livestock Grazing section, Action 9 for changes made to Alternative E, including provision for reducing or cancelling grazing use because of failing rangeland health standards.
DR-MTDK-MC-13-0032-1	Have you bothered to tell the public that if they don't comply with your ideas within a 5 yr time frame - you'll jerk their livestock grazing permits?	See Chapter 2, Comparison of Alternatives Table 2-5, Livestock Grazing section, Action 9 for changes made to Alternative E , including provision for reducing or cancelling grazing use because of failing rangeland health standards.
DR-MTDK-MC-13-0094-3	As quoted in the Draft RMP: Preferred Alternative: Action 3 " The allotments in Table 1 (see the Livestock Grazing Appendix), in which the Standards for Rangeland Health were not met (including Sage-grouse Habitat), livestock grazing was a causal factor in the failure to meet these standards, and there was no progress towards meeting Standards for Rangeland Health in the allotments within 5 years of the initial determination would be eliminated and closed to livestock grazing." You should show solicitors opinion, regulation, or statute that allows you this authority.	See Chapter 2, Comparison of Alternatives Table 2-5, Livestock Grazing section, for changes made to Alternative E, Action 9 including provision for reducing or cancelling grazing use because of failing rangeland health standards.
DR-MTDK-MC-13-0102-21	Environmental assessments are prepared to assess the effects of alternatives developed to ensure that Rangeland Health Standards are met through grazing allotment goals and objectives. If livestock grazing levels or practices are a significant factor in failing to meet Rangeland Health Standards, the BLM has committed to take action no later than the start of the next grazing year to initiate progress toward meeting the Standards. Since such action must be taken quickly, we recommend that the Proposed RMP include a list of potential measures that could be implemented at the project level to meet Rangeland	See Chapter 2, Comparison of Alternatives Table 2-5, Livestock Grazing section, Action 9 for changes made to Alternative E, including provision for reducing or cancelling grazing use because of failing rangeland health standards. Also, the Standards for Rangeland Health and Guidelines for Livestock Grazing Management (BLM 1997c) lists the guidelines for grazing management. Implementing one or more of these guidelines can ensure standards are met or that significant

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	Health Standards.	progress can be made toward achieving the standards.
DR-MTDK-MC-13-0117-10	The Draft RMP provides for: Loss of 6,125 acres and up to 1,803 AUMs; The closing of allotments within 5 years for not meeting the Standards for Rangeland Health; The closing of allotments for not meeting water quality standards; The reduction of 3,125 acres and up to 1,257 AUMs in the SRMAs and the ACECs; and, the restrictions of grazing in WSAs. These reductions were not properly analyzed under NEPA, as to required indirect and direct effects of this action. Furthermore, when the BLM analyzed the economic and social impacts of the Draft RMP it did not use the actual, correct number in the plan for livestock grazing reductions.	See Chapter 2, Comparison of Alternatives Table 2-5, Livestock Grazing section, for changes made to Alternative E, including provision for reducing or cancelling grazing use because of failing rangeland health standards.
DR-MTDK-MC-13-0117-11	The Standards for Rangeland Health and Guidelines "provide the technical and scientific basis for measuring progress towards healthy and productive rangelands." Standards for Rangeland Health and Guidelines, Preamble. However, the Draft RMP requires the closing of allotments instead of making progress towards meeting the functions and conditions included within the Standards. Therefore, the Draft RMP is more restrictive than the Standards the Draft RMP is supposed to meet.	See Chapter 2, Comparison of Alternatives Table 2-5, Livestock Grazing section, Action 9 for changes made to Alternative E, including a provision for reducing or cancelling grazing use because of failing rangeland health standards.
DR-MTDK-MC-13-0117-9	Even though at first glance, the BLM indicates that grazing will continue at near current levels, a more detailed analysis indicates many instances where the BLM may negatively impact grazing under this Draft RMP. These instances include statements such as: "Allotments wholly located within sage grouse Habitat - Priority Area habitat would be considered for retirement where the base property owner relinquished their preference." Draft RMP at pg. 2-50. "The allotments in Table I (see the Livestock Grazing Appendix), in which the Standards for Rangeland Health were not met (including Sage-grouse Habitat), livestock grazing was a causal factor in the failure to meet these standards, and there was no progress towards meeting Standards for Rangeland Health in the allotments within 5 years of the ROD of the RMP, would be eliminated and closed to livestock grazing. Exhibit C -Standards for Rangeland Health and Guidelines. The lands would no long be chiefly valuable for grazing." Draft RMP at pg. 2-75. "BLM-administered lands would be closed to livestock grazing after wildfire, prescribed fire, or non-fire vegetative treatments until the area attained treatment or rehabilitation plan resource objectives." Draft RMP at pg. 2-77. Throughout the Draft RMP the BLM has committed itself to meeting PFC water quality standards and to manage for aquatic habitat. "Closing allotments within 5 years that did not meet Standards for Rangeland Health would increase water quality and watershed health but decrease water quality in the short term." Draft RMP at 2-193. Based on the Draft RMP,	See Chapter 2, Comparison of Alternatives Table 2-5, Livestock Grazing section, for modifications made to Actions 6 and 9.

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	livestock grazing is not the reason for most issues related to water quality and watershed health. Therefore, closing allotments is not a solution Further, the Standards are meant to establish a process of analysis to progress towards meeting the Standards.	
DR-MTDK-MC-13-0146-23	Pg. 2-193, Alternative E states that allotments that did not meet Standards for Rangeland Health would be closed within 5 years. This is inconsistent with pg. 2-75, Action 9, which mentions that if livestock grazing was a causal factor and that if progress towards meeting Standards for Rangeland Health were not met, then the allotment would be closed.	See Chapter 2, Comparison of Alternatives Table 2-5, Livestock Grazing section, Action 9 for changes made to Alternative E, including provision for reducing or cancelling grazing use because of failing rangeland health standards.
DR-MTDK-MC-13-0147-1	It is proposed that livestock grazing carrying capacity be calculated for yearling cattle at a rate of 1 AUM per yearling. In the past, a yearling has been pastured at 0.75 AUM. Raising this to 1 AUM would mean fewer cattle on the land, and the economic impacts and viability of ranches that go along with this reduction.	See Chapter 2, Comparison of Alternatives Table 2-5, Livestock Grazing section. This alternative is no longer considered.
DR-MTDK-MC-13-0147-2	Only Congress may permanently exclude lands from grazing use. This is from US Dept of Interior - Office of the solicitor - WA. DC. 20240 reference M-37008 October 4, 2002. William G. Myers Not only is the RMP preferred alternative proposing to go against a BLM-solicitors opinion, it is proposing a reduction that will be very damaging to our communities and way of life.	See Chapter 2, Comparison of Alternatives Table 2-5, Livestock Grazing section, Action 9 for changes made to Alternative E, including provision for reducing or cancelling grazing use because of failing rangeland health standards.
DR-MTDK-MC-13-0161-1	Action 3 " The allotments in Table 1 (see the Livestock Grazing Appendix), in which the Standards for Rangeland Health were not met (including Sage-grouse Habitat), livestock grazing was a causal factor in the failure to meet these standards, and there was no progress towards meeting Standards for Rangeland Health in the allotments within 5 years of the initial determination would be eliminated and closed to livestock grazing." Please show solicitors opinion, regulation, or statute that allows you this authority.	See Chapter 2, Comparison of Alternatives Table 2-5, Livestock Grazing section, Action 9 for changes made to Alternative E, including provision for reducing or cancelling grazing use because of failing rangeland health standards.
DR-MTDK-MC-13-0176-2	Action 24 (pg. 2-50). "Allotments wholly located within sage-grouse habitat - protection priority habitat would be considered for retirement where the base property owner relinquished their preference." It is well documented that grazing as a management technique can improve plant vigor and diversity, and that undisturbed grass stands may become degraded and undesirable for nesting and brood rearing birds. No doubt, overgrazing or poorly managed grazing can be detrimental to sage-grouse. However, a complete lack of rangeland management in perpetuity is not an ideal situation.	See Chapter 2, Comparison of Alternatives Table 2-5, Livestock Grazing section. The alternative has been modified to note that at the time a permittee or lessee voluntarily relinquishes a permit or lease, the BLM would consider whether the public lands should remain available for the livestock grazing or be used for the other resource management objectives (Action 6).
DR-MTDK-MC-13-0108-1	One of the coal management actions identified in the Draft RMP that is common to all alternatives is to manage the federal coal resource to provide for the development of federal coal in an orderly and timely manner and consistent with the federal coal management program and policies, environmental integrity, and national energy needs. Draft RMP at 2-81. However, the Draft	See Chapter 2, Comparison of Alternatives Table 2-5, Minerals, Coal section. The referenced goals and objectives statement has been removed from the table. The coal RFDs for the planning area have been re-evaluated using updated production and coal forecast data. See Chapter 4, Minerals, Coal, where the analysis

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	RMP contains neither the information nor the management direction necessary to implement that management action effectively. BLM has not considered new technologies, economics, improved environmental impact mitigation techniques, or information on coal development potential in the area and simply repeats the coal program as it was developed in the Powder River Basin RMP in 1985 and in the Big Dry RMP in 1996. In fact, the coal section of the Minerals Appendix merely contains excerpts from the previous RMPs with no attempt to evaluate current conditions.	indicates there are enough coal resources within the RFD areas to sustain current mines at the current and forecasted rate of growth. Discussion regarding the reason the BLM proposes to carry forward existing coal planning decisions may be found in the Minerals Appendix.
DR-MTDK-MC-13-0142-11	Include a discussion that clearly outlines how existing monitoring and adaptive management mechanisms currently in place as part of the BLM's 2008 Final Supplement to the Montana Statewide Oil and Gas Environmental Impact Statement and Proposed Amendment of the Powder River and Billings Resource Management Plans would be extended to management decisions proposed as part of the Proposed RMP.	See Chapter 2, Comparison of Alternatives Table 2-5, Minerals, Oil & Gas section, Action 9.
DR-MTDK-MC-13-0089-4	By proposing to offer all 5.4 million acres in the Miles City RMP as open for oil and gas development, Draft RMP at pg. 2-5 "which is one of the largest sources of VOCs, ozone, and sulfur dioxide emissions in the United States" air quality, human health, and compliance or interference with the EPA's Regional Haze rules must be analyzed in greater detail in the Miles City RMP and EIS.	See Chapter 2, Comparison of Alternatives Table 2-5, Minerals; Oil and Gas section; for acres open to leasing. Also, see Chapter 4, Air Resources and Climate, Management Common to All Alternatives, AQRV Impacts section. CALPUFF modeling to assess visibility impacts at the Medicine Lake Wilderness Class I area was performed.
DR-MTDK-MC-13-0002-1	Outfitting: BLM should not issue any outfitting permit on BLM acreage that has public access by county road/highway/river. b. Is adjacent to other public land: State Land/Forest Service/US Fish and Wildlife Service, others. c. Is adjacent to or within the boundaries of a Block Management Agreement boundary. The justification for these acreage withdrawals from commercial outfitting is your multiple use mandate. The outfitting industry has numerous ranches leased in eastern Montana that hold landlocked BLM acreage which could be leased to an outfitter. This administrative method of handling commercial outfitting on BLM acreage insures the public that commercial outfitting will not conflict with the public's right to use BLM land.	See Chapter 2, Comparison of Alternatives Table 2-5, Recreation, Special Recreation Permits section, Action 2 for modifications to the alternative.
DR-MTDK-MC-13-0173-1	Outfitter leased lands was over 6 million acres two years ago and growing, and that does even not include land outfitted by landowners themselves. There are thousands of acres of public land surrounded on four sides by outfitter-leased lands that unavailable to the public but available for no cost to outfitters or landowners for commercial outfitting.	See Chapter 2, Comparison of Alternatives Table 2-5, Recreation, Special Recreation Permits section for modifications to the alternatives.
DR-MTDK-MC-13-	Short Pines OHV Recreation Area. The BLM has created a recreation spot that permits off road vehicle to use a large portion of Dawson County's rangelands. There are many trails, and new trails are created on a constant basis. The highly	See Chapter 2, Comparison of Alternatives Table 2-5, Recreation; SRMAs, ERMAs and Public Lands Not Designated; Glendive Short Pine OHV section, Action 9. The area would no

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0100-1	erodible soils are suffering, and now a new problem has been created. The rangelands in this area are being destroyed by erosion.	longer be open to OHVs.
DR-MTDK-MC-13-0100-2	The erosion is occurring on many of the 2000 plus acres that BLM is allowing the OHVs access to. In addition to the BLM land, many acres of private land are also being violated. The private land owners must pay for the grass that is destroyed. The numerous (too many to count) OHV tracks on the hills cause washouts, with new ones cropping up constantly. This causes the excess erosion to settle at the bottom of the hills, where the majority of the grass is found, and the silt ends up in the creek beds and coulees. The result is silt and erosion being deposited on private land, affecting the grazing and the watering of animals, and creating problems for hay crops.	See Chapter 2, Comparison of Alternatives Table 2-5, Recreation; SRMAs, ERMA's and Public Lands Not Designated; Glendive Short Pine OHV section, Action 9. The area would no longer be open OHVs.
DR-MTDK-MC-13-0131-1	The Glendive Short Pines OHV area. We are paying for the grass on these some 2000 acres that they are tearing up. This area is highly erodible, worst in Dawson County. Our cattle are run off these areas and away from watering places, also they are running our horses through fences and are getting cut up. The animals are being hit by vehicles and killed. It is way too much traffic.	See Chapter 2, Comparison of Alternatives Table 2-5, Recreation; SRMAs, ERMA's and Public Lands Not Designated; Glendive Short Pine OHV section, Action 9. The area would no longer be open to OHVs.
DR-MTDK-MC-13-0105-2	The RMP should discuss potential solar development areas. There are areas that would be suitable for solar or a combination of wind and solar that would make sense. A megaplant for solar energy is not the only way to produce power.	See Chapter 2, Comparison of Alternatives Table 2-5, Renewable Energy section. Solar development is part of the Renewable Energy section. See also Chapter 4, Renewable Energy, Assumption and Methodology for all Alternatives section for the potential for solar energy in the planning area.
DR-MTDK-MC-13-0102-20	Consider revising the 300 foot CSU setback for riparian and wetland areas to a 500 foot NSO setback for perennial, intermittent and ephemeral streams, lakes, ponds, reservoirs, riparian and wetland areas. Other BLM Field Offices have required a 500 foot setback to minimize potential deterioration of water quality and to maintain natural hydrologic function of stream channels, stream banks, floodplains, and riparian communities (e.g., see Grand Junction Field Office Draft RMP, NSO-1, Major River Corridors; NSO-2, Streams/Springs). We also recommend adding "springs" to the list of water resources protected by these stipulations in order to maintain proper function of these susceptible resources (e.g., see Grand Junction Field Office, NSO-4, Lentic Riparian Areas - which includes springs, seeps and fens). Further, given the large number of water bodies in the MCFO planning area that are impaired due to sedimentation and/or alteration in stream-side vegetative cover, we recommend a 750-foot NSO buffer for these impaired waters located in areas of high development potential (such as the Powder River and Williston Basins and the Cedar Creek Anticline).	See Chapter 2, Comparison of Alternatives Table 2-5, Riparian and Wetland Areas for modifications. Montana's EPA-approved 2012 Final Water Quality Integrated Report demonstrates the proposed lease stipulations are effective at maintaining water quality. In the report, only 2 waterbodies in the State are listed as impaired with a probable source being "Petroleum/Natural Gas Activities." Neither waterbody is located in the planning area. Additionally, no waterbodies are listed as impaired with a similar probable source in North or South Dakota (i.e., the other field offices of the BLM Eastern Montana/Dakotas District). In Chapter 2, Comparison of Alternatives Table 2-5, Riparian and Wetland Areas, Alternative E, oil and gas leasing would be offered with a CSU stipulation within 300 feet of riparian and wetland areas. Studies cited within the PRMP/FEIS indicate that a 300 foot buffer maintains water quality by significantly reducing concentrations of fecal coliform, nitrogen, phosphorus, sediment, and pesticides. The 300-foot buffer provides a high

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		level of protection by creating a buffer that extends from the boundary of the wetland or riparian area, not just the edge of the stream. Per EPCA, the CSU stipulation is the least restrictive stipulation that still protects the resource. See the Glossary for the definition of riparian; perennial springs exhibiting visible vegetation or physical characteristics reflective of permanent surface or subsurface water influence fall within the definition or riparian areas.
DR-MTDK-MC-13-0092-13	The Draft RMP falls short of addressing the need to manage some sufficient quantity of BLM lands for black-footed ferret reintroduction, as well as for the suite of other prairie dog dependent species.	See Chapter 2, Comparison of Alternatives Table 2-5, Special Designation Areas, ACEC section and the Fish, Aquatic and Wildlife Habitat, Including Special Status Species section for modifications to the alternatives. BLM will work with the Montana Black-footed Ferret and Prairie Dog Working Groups to identify any potential black-footed ferret reintroduction sites in the planning area. Also, in the Special Designation Areas Appendix, ACEC section, the Black-footed Ferret ACEC is no longer recommended for ACEC designation.
DR-MTDK-MC-13-0162-9	We recommend that a second action be added for all alternatives that specifically addresses Objective 3. Focus treatment programs on reestablishment, recruitment, seedling and sapling survival, and achievement of a healthy and diverse community structure as follows: "Action 2 " The BLM would expand the size and distribution of hardwood draws using, but not limited to, a combination of treatments, such as seeding, planting of seedlings and containerized trees and shrubs, fire suppression, and managed herbivory." We also recommend that a third action be added for all alternatives that is similar to an action listed for Riparian and Wetlands and Areas on pg. 2-23, as follows: "Action 3 " The BLM would, on a case-by-case basis, use temporary or permanent enclosures in woody draws to promote species diversity, recruitment, and ecosystem functionality."	See Chapter 2, Comparison of Alternatives Table 2-5, Vegetation section; and the Riparian and Wetland Areas section for revisions.
DR-MTDK-MC-13-0146-1	Non-native haying should be encouraged and allowed to be done often to avoid woody stands of decadent, unhealthy stands of introduced grasses. Placing water tanks from pipelines in these patches of introduced grasses is an excellent idea. Perhaps a \$5 per acre administrative fee could help cover costs. Haying non-native grasses is much better for air quality than burning it.	See Chapter 2, Comparison of Alternatives Table 2-5, Vegetation, Haying section, Alternative E for modifications. Harvesting nonnative hay would be allowed to meet fuels, vegetation or habitat objectives.
DR-MTDK-MC-13-0102-13	The EPA recommends setback stipulations, such as No Surface Occupancy (NSO), to minimize the potential for impacts to potential drinking water resources, including domestic water wells and public water supply wells.	See Chapter 2, Comparison of Alternatives Table 2-5, Water Resources section and the Minerals Appendix, Fluid Minerals, Lease Stipulations section. The alternatives were modified by adding a management action addressing surface-disturbing

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		<p>activities and oil and gas leasing in Source Water Protection Areas. The majority of proposed oil and gas wells within 500 feet of private water wells would be located on non-federal surface, and well locations should be agreed upon by both the operator and the surface owner. Onshore Oil and Gas Order Number 1 allows for the movement of proposed wells by up to 660 feet, which may be used to move proposed well locations away from private wells when necessary.</p>
<p>DR-MTDK-MC-13-0102-19</p>	<p>We have several concerns and recommendations regarding the wording of the NSO stipulations, as follows: The use of "obligate wetland species or hydric soils" as indicators for intermittent streams results in an unnecessarily narrow definition of intermittent stream that would likely result in excluding many of these streams from protection. We recommend removing this clause from the NSO stipulation. Since the Draft RMP identifies 97% of stream miles in the planning area as intermittent or ephemeral, we recommend further clarification to the "streams" language by including ephemeral streams in the list of water resources to be protected by the NSO stipulation. We recommend clarifying the NSO language to be applicable to "100-year floodplains" in order to provide certainty for operators. In reviewing numerous oil and gas leasing stipulations contained in other BLM EISs, we have not seen an exception process to allow drilling within water bodies or wetlands. It is our understanding that a "no exceptions approach" within a water body or wetland is BLM's standard procedure. We recommend removing the exceptions clause from the MCFO NSO stipulations given the importance of preventing disturbance within water bodies and wetland areas.</p>	<p>See Chapter 2, Comparison of Alternatives Table 2-5, Water Resources section and the Minerals Appendix, Fluid Minerals, Lease Stipulations, Alternative E section. Alternative E and the stipulations related to "Water" and "Riparian and Wetland Areas" have been modified. Montana's EPA-approved 2012 Final Water Quality Integrated Report demonstrates the Miles City Field Office's project-level implementation of BMPs near ephemeral streams is effective at maintaining water quality. In the report, there are no waterbodies in the planning area listed as impaired with a probable source being "Petroleum/Natural Gas Activities."</p>
<p>DR-MTDK-MC-13-0102-24</p>	<p>In order to ensure public drinking water supply sources (e.g., surface water sources, including GWUDISW sources, and groundwater sources) are protected from potential impacts associated with oil and gas leasing, the following NSO language is recommended: Municipal Supply Watersheds(1) - NSO within any of the following areas, as deemed appropriate by the BLM: The entire watershed; or Local Source Water Protection Planning Areas where delineated in a Source Water Protection Plan; or Surface Water Spill Response Region or Groundwater Inventory Region defined by Source Water Assessments that have been delineated or evaluated by the State Surface Water Spill Response Regions are 1/2-mile-wide zones (on both sides of rivers or streams, upstream of drinking water intakes. They include the water body with the surface water intake and significant tributaries, for 10 miles upstream of the drinking water intake. For lakes and reservoirs, they include a 1/2-mile-wide</p>	<p>See Chapter 2, Comparison of Alternatives Table 2-5, Water Resources section, and the Minerals Appendix, Fluid Minerals, Lease Stipulations section. The alternatives have been modified.</p>

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	zone around the waterbody. Groundwater Inventory Regions are based on a three-year time of travel or a fixed radius of 1,000 feet (concentric buffer) around the public water supply well.	
DR-MTDK-MC-13-0102-26	For surface water sources, if the Municipal Supply Watersheds NSO stipulation is not deemed feasible by the BLM, then at a minimum we recommend a 1,000-foot NSO or CSU setback on both sides of the river or stream, for 10 miles upstream of the intake. For lakes and reservoirs, this would include a 1000-foot NSO or CSU setback around the water body.	See Chapter 2, Comparison of Alternatives Table 2-5, Water Resources section, and the Minerals Appendix, Fluid Minerals, Lease Stipulations section. The alternatives have been modified.
DR-MTDK-MC-13-0102-27	For groundwater and GWUDISW sources, if the Municipal Supply Watersheds NSO stipulation is not deemed feasible by the BLM, we recommend a minimum 1,000-foot CSU concentric buffer for these sources.	See Chapter 2, Comparison of Alternatives Table 2-5, Water Resources section, and the Minerals Appendix, Fluid Minerals, Lease Stipulations section. The alternatives have been modified.
DR-MTDK-MC-13-0102-28	We recommend the BLM include a commitment in the Proposed RMP and ROD to provide notice to lessees for drilling within Source Water Protection (SWP) Zones of public water supplies.	See Chapter 2, Comparison of Alternatives Table 2-5, Water Resources section. Alternative E, the Proposed Alternative, would prohibit oil and gas development (NSO) in source water protection areas.
DR-MTDK-MC-13-0134-17	Impoundments are discussed in the coal bed natural gas water management section of the Appendices (pg. BMP-5) and again in the preferred alternative (pg. 2-18) Action 9. Surface water impoundments would be allowed with measures designed to maintain the natural flow regime, water quality, and riparian and watershed functionality and resiliency. Per Diamond Cross Properties v. State of Montana, Pinnacle Gas Company et al. Civil Case No. DV-2005-27 and DV-2005-70, disposal of CBM groundwater in a manner without any recognized benefit from the water does not pass constitutional muster. All use of impoundments as a method of water disposal should be removed from the RMP.	See Chapter 2, Comparison of Alternatives Table 2-5, Water Resources section, Action 4 and the Glossary. Surface water impoundments do not include impoundments of groundwater, water from wells, or produced water sources (e.g. water disposal pit).
DR-MTDK-MC-13-0190-5	How and when would "vegetated buffer zones" be established? How would BLM determine the appropriate width of these zones? What activities would be prohibited in the zones?	See Chapter 2, Comparison of Alternatives Table 2-5, Water Resources section. This management action has been removed from all alternatives. For a comparison of riparian and wetland area buffer alternatives, such as a 300 foot buffer in Alternative E, see Chapter 2, Comparison of Alternatives Table 2-5, Riparian and Wetland Areas.
DR-MTDK-MC-13-0092-14	There are four potential zones in the MCFO planning area containing one or more prairie dog complexes: 1) SE Powder River County (BLM and private land); 2) Dry Arm, eastern Garfield and SE McCone Counties (BLM, private, and U.S. Fish and Wildlife Service land); 3) Central Rosebud County (BLM and private); and 4) Custer/Prairie County (BLM and private-includes the current existing ferret ACEC).	See Chapter 2, Comparison of Alternatives Table 2-5; Fish, Aquatic and Wildlife Habitat, Including Special Status Species; Black-tailed Prairie Dogs section. Management of Black-tailed prairie dogs would be subject to the Management Conservation Plan for Black and White-tailed Prairie Dogs in Montana (MT Prairie Dog Working Group 2002). The BLM would work with

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		the Montana Black-footed Ferret and Prairie Dog Working Groups to identify potential black-footed ferret reintroduction sites in the planning area. Also, the Black-footed Ferret ACEC is no longer recommended for ACEC designation.
DR-MTDK-MC-13-0104-10	BLM has failed to demonstrate why surface disturbing and disruptive activities will be avoided and future oil and gas leases will be offered with NSO stipulations within 0.25 miles of Interior Least Tern habitat, while surface disturbing and disruptive activities will be allowed and oil and gas leases will be offered with CSU stipulations within 0.25 miles of Piping Plover habitat.	See Chapter 2, Comparison of Alternatives Table 2-5; Fish, Aquatic and Wildlife Habitat, Including Special Status Species; and the Fish, Aquatic and Wildlife Habitat, Including Special Status Species Appendix, Special Status Species section for revisions.
DR-MTDK-MC-13-0121-18	Why are the Piping Plover and the Interior Least Tern, both listed as endangered under the ESA, receiving different levels of protection in the RMP?	See Chapter 2, Comparison of Alternatives Table 2-5; Fish, Aquatic and Wildlife Habitat, Including Special Status Species; Piping Plover Habitat and the Interior Least Tern Habitat sections for revisions.
DR-MTDK-MC-13-0121-26	On pg. 2-58, Sage-Grouse Habitat Compensation (compensation would be for Sage-Grouse Habitat-General Habitat Areas, Protection Priority Areas, and Restoration Areas); Alternative E, indicates that Habitat compensation would not be required for Action 1. However, Action 1 under Management Common to all Alternatives on pg. 2-55 states: Where deemed effective, water developments would be managed to reduce the spread of West Nile virus (see Best Management Practices [BMPs] identified in the Fish and Wildlife Appendix).	See Chapter 2, Comparison of Alternatives Table 2-5; Fish, Aquatic and Wildlife Habitat, Including Special Status Species; GRSG Compensation section for changes. Also, see the Greater Sage-Grouse (GRSG) Required Design Features Appendix for revisions.
DR-MTDK-MC-13-0121-60	Are the 2.5 million acres reported as sage-grouse habitat under BLM Administration(within the MCFO planning area) a summation of the Oil and Gas Lease acreages reported for the three main management categories reported in MCFO RMP Table 2.22? See summary in Table 1 (General Habitat Acres [800,000 acres], Protection-Priority Areas [1,403,000 acres] and Restoration Areas and Source Population Area [289,000 acres]).	See Chapter 2, Comparison of Alternatives Table 2-5; Fish, Aquatic and Wildlife Habitat, Including Special Status Species; GRSG Habitat section for acreage modifications.
DR-MTDK-MC-13-0142-2	The species habitat delineations in the Draft RMP are inconsistent with those identified by Montana Fish, Wildlife & Parks (FWP).	See Chapter 2, Comparison of Alternatives Table 2-5; Fish, Aquatic and Wildlife Habitat, Including Special Status Species; GRSG Habitat section. Alternative E includes MFWP's sage-grouse Core Areas.
DR-MTDK-MC-13-0146-35	Pgs. 2-213 and 2-214 ROWs and other Land Use Authorizations avoided or excluded lands and Realty Power Lines. The changes on these two pages from Alternative A to Alternative E is huge and costly, and this document acknowledges this. Is it necessary to prohibit all power lines, phone lines, and pipelines of all kinds? This might be the biggest economic hit of all.	See Chapter 2, Comparison of Alternatives Table 2-5; Fish, Aquatic and Wildlife Habitat, Including Special Status Species; GRSG Habitat – General Habitat Areas section. Alternative E for surface-disturbing activities, such as ROWs, has been modified.
DR-MTDK-	Requested information for clarification: Difference in boundaries between the Garfield-Rosebud PPH (Map 7) proposed for Alternative B and the North	See Chapter 2, Comparison of Alternatives Table 2-5; Fish, Aquatic and Wildlife Habitat, Including Special Status Species;

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MC-13-0150-1	Rosebud PPH (Map 4) proposed for Alternative E, both of which were originally based on the Rosebud Core Area. Depending on the reasoning, it may be appropriate to reduce the PPH to the boundaries proposed for Alternative E. Footnote #8, Draft RMP at pg. 2-189, needs clarification as to what habitat types these are associated with. In general, these sound like very sound protective measures. Clarification needed on what Creation of a Mitigation Trust Account would entail. Draft RMP at 2-189. Transparency and accountability are paramount. Appropriate mitigation must be selected and monitored for effectiveness? Request information on estimated number of leks (including size) within the boundaries of the Miles City RMP, as well as within each habitat type? Request information on status of genetic testing that was referenced on pg. 3-73 of Draft RMP.	GRSG Habitat section for GRSG habitat boundaries per alternative. Footnote #8 has been deleted. See Chapter 3, Fish, Aquatic and Wildlife Habitat, Including Special Status Species; Special Status Species (Aquatics, Avian and Terrestrial); Special Status Species - Avian; Greater Sage-grouse section for information on lek numbers and status. The genetics testing data gathering and results are not yet complete.
DR-MTDK-MC-13-0150-6	While winter range/concentration areas were referenced in the document (Draft RMP, pg. 2-47) with protective measures, winter habitat was neither spatially referenced/identified nor quantified.	See Chapter 2, Comparison of Alternatives Table 2-5; Fish, Aquatic and Wildlife Habitat, Including Special Status Species; GRSG Habitat – General Habitat Areas and GRSG Habitat - Priority Areas sections. Winter concentration areas and other winter survey data locations are within the general or priority habitat areas.
DR-MTDK-MC-13-0171-6	Will fish and wildlife habitat be given priority within important areas within the RMP such as migration routes, nesting and calving areas and security habitat for wildlife?	See Chapter 2, Comparison of Alternatives Table 2-5; Fish, Aquatic and Wildlife Habitat, Including Special Status Species; Alternative E. Important habitats such as calving and migration routes are unknown or non-existent in the planning area. Nests, particularly raptors and other migratory birds receive special management.
DR-MTDK-MC-13-0191-12	Table 2-1, Greater Sage-grouse PPA Action 7. Please clarify what is meant by "at a minimum".	See Chapter 2, Comparison of Alternatives Table 2-5; Fish, Aquatic and Wildlife Habitat, Including Special Status Species; GRSG Habitat – Priority Areas section for revisions.
DR-MTDK-MC-13-0191-15	Table 2-1, Greater Sage-grouse PPA Action 18. Would range improvement structures not found to conserve, enhance, or restore Greater Sage-grouse habitat be removed? Please clarify.	See Chapter 2, Comparison of Alternatives Table 2-5; Fish, Aquatic and Wildlife Habitat, Including Special Status Species; GRSG Habitat – Priority Areas section for revisions.
DR-MTDK-MC-13-0191-17	It is unclear from Table 2-1 and the Greater Sage-grouse BMP Appendix as to what specific actions would trigger mandatory compensatory Greater Sage-grouse mitigation under Alternatives B, C, and D. Does this apply to all surface-disturbing activities, including mining? Also, while the basis for calculation of the 5%, 3%, and 10% disturbance cap for Greater Sage-grouse habitat per section is clear, the basis for the accompanying 1 % cap for “sage-	See Chapter 2, Comparison of Alternatives Table 2-5; Fish, Aquatic and Wildlife Habitat, Including Special Status Species; GRSG Compensation section for changes.

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	grouse habitat" is unclear. The basis for this 1 % calculation should be clarified.	
DR-MTDK-MC-13-0191-8	The proposed PPAs are not, under any of the alternatives, inclusive of all Montana Fish, Wildlife and Parks (FWP) mapped sage-grouse core areas and COT Report PACs in the Planning Area (FWP core areas and PACs are identical). Alternatives B and E do appear to include all such core PAC areas if proposed RAs are included along with PPAs. We recommend that PPAs be inclusive of all core areas PACs, or that clear rationale be provided as to how these proposed areas (PPAs plus RAs) are consistent with the core area PAC mapping and protection intent.	See Chapter 2, Comparison of Alternatives Table 2-5; Fish, Aquatic and Wildlife Habitat, Including Special Status Species; GRSG Habitat section. Alternative E includes MFWP's Sage-grouse Core Areas.
DR-MTDK-MC-13-0150-10	High voltage powerlines should be avoided within PPH, to the greatest extent possible. While they are allowed within General Habitat, they should avoid areas within 1 mile of a lek to minimize grouse avoidance behavior and increased predation pressure.	See Chapter 2, Fish, Aquatics and Wildlife, Greater Sage-grouse section. Actions limiting surface disturbing activities in the Priority Habitat include powerlines.
DR-MTDK-MC-13-0092-3	The plan should clearly document its analysis of the NTT report recommendations.	See Chapter 2, Greater Sage-Grouse (GRSG) Habitat Management section for discussion on the NTT report. As noted there, the NTT report recommendations are considered, as appropriate, in Alternative B.
DR-MTDK-MC-13-0121-25	At what point in the RMP process will specific information be developed to guide assessments of habitat functionality, monitoring, and compensatory mitigation for sage-grouse and other sensitive species?	See Chapter 2, Greater Sage-Grouse (GRSG) Habitat Management section and its subsections; the Greater Sage-Grouse (GRSG) Required Design Features Appendix; the Greater Sage-Grouse (GRSG) Monitoring Framework Appendix, the Mitigation Measures and Conservation Actions Appendix and the Monitoring Appendix for revisions.
DR-MTDK-MC-13-0076-8	As BLM is aware, the State of Montana has formed a Greater Sage-grouse Advisory Council to develop conservation measures by January 2014 to be enacted into law for protection of the sage-grouse and its habitat in Montana. APLIC recommends the BLM adopt the same conservation measures that the Montana Greater Sage-grouse Advisory Council is developing in order to maintain as much consistency with requirements for electric and gas distribution and transmission line as possible. The Montana conservation measures are expected to be developed for adequate protection of the species and to avert a final listing decision from USFWS. Applying the same conservation measures will avoid much confusion and will be much more efficient for industry to manage and implement.	See Chapter 2, Greater Sage-Grouse (GRSG) Habitat Management, BLM Proposed Plan for GRSG Management section for consideration of the Governor's plan. Also, see Chapter 2, Comparison of Alternatives Table 2-5; Fish, Aquatic and Wildlife Habitat, Including Special Status Species; GRSG Habitat - Priority Areas section, Action 3, Alternative E for revisions.
DR-MTDK-MC-13-	There is no mention of some main reasons for loss of sage-grouse numbers. For example, mother nature (drought, flooding, west Nile virus), predators (cats, skunks, fox, coyotes, all raptors). We have no control over Mother Nature but a	See Chapter 2, Greater Sage-grouse (GRSG) Habitat Management, BLM Programs for Addressing GRSG Threats section and Table 2-1. See Chapter 3, Fish, Aquatic and Wildlife

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0111-2	predator program could be addressed.	Habitat, Including Special Status Species; Special Status Species (Aquatics, Avian and Terrestrial); Special Status Species - Avian; Greater Sage-grouse; Conservation Strategies and Participatory Efforts; Predation Relationship section for discussion.
DR-MTDK-MC-13-0191-19	Table 2-1, Fuels Management Prescribed Fire Action 3, Alternative B. This action states "Prescribed fire would not be allowed on approximately 2,500,000 acres and allowed in the remainder of the planning area." Does this prohibition area include sage-grouse PPAs? RAs? GH? Please clarify.	See Chapter 2, Greater Sage-grouse (GRSG) Habitat Management, BLM Proposed Plan for GRSG Management section for management of prescribed fire in Greater Sage-grouse habitat.
DR-MTDK-MC-13-0191-2	Threats to sage-grouse (including the inadequacy of regulatory mechanisms) as described in the most current USFWS 2010 Warranted But Precluded Finding are not, but should be, included. Discussion should also be added to the effect that the Greater Sage-grouse has been determined to warrant listing under the ESA, and a proposed rule or change in determination must be made by the end of fiscal year 2015 as a condition of a court approved settlement agreement. We also recommend that the most current literature be referenced in this section, including Knick et al. (2013).	See Chapter 2, Greater Sage-grouse (GRSG) Habitat Management, BLM Programs for Addressing GRSG Threats section and Table 2-1. See Chapter 3, Fish, Aquatic and Wildlife Habitat, Including Special Status Species; Special Status Species (Aquatics, Avian and Terrestrial); Special Status Species - Avian; Greater Sage-grouse; Conservation Strategies and Participatory Efforts section for revisions.
DR-MTDK-MC-13-0133-7	NWE encourages the BLM to consider mitigation banks and offsite mitigation as mechanisms to pool habitat conservation resources and target conservation efforts in highest priority areas. In the development of such mitigation banks, the potential for future energy delivery corridors should be considered. For unknown impacts of operating and maintaining gas production and delivery systems and power lines, NWE recommends that the BLM provide opportunities and incentives to conduct additional studies using the research protocols developed by Utah Wildlife in Need in 2012 and endorsed by the Western Association of Fish and Wildlife Agencies (WAFWA). As indicated by WAFWA, such research should be acceptable as a component of a mitigation package for unknown project impacts. In addition, NWE encourages the BLM to jointly identify potential sage-grouse incentives and partnerships with the electric and gas utility industry.	See Chapter 2, Greater Sage-Grouse Habitat Management section and its subsections and Chapter 4, Fish, Aquatic and Wildlife Habitat, Including Special Status Species section for revisions and mitigation considered.
DR-MTDK-MC-13-0104-19	Pg. BMP-37. "NEPA analysis would disclose the impact of the addition to the surface disturbance total for the local population within the priority sage grouse habitat. If that analysis shows anthropogenic disturbance crossing or above 3 percent for that area..." Wyoming has previously used a 5% factor. What is the scientific basis for this 3% factor?	See Chapter 2, Greater Sage-grouse Habitat - Priority Habitat Management Areas, Action 3 for a discussion on the percentages. See the Bibliography reference Knick, Hanser, Preston 2013. Ninety-nine percent of active leks were in landscapes with <3% developed and all lands surrounding leks were <14% developed.
DR-MTDK-	Wyoming has been effectively using the 5 percent factor with extensive experience. Upon what scientific evidence is this 3 percent disturbance factor	See Chapter 2, Greater Sage-grouse Habitat - Priority Habitat Management Areas, Action 3 for a discussion on the

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MC-13-0121-20	based?	percentages. See the Bibliography reference Knick, Hanser, Preston 2013. Ninety-nine percent of active leks were in landscapes with <3% developed and all lands surrounding leks were <14% developed.
DR-MTDK-MC-13-0125-5	Without exclusionary fencing of riparian communities, these areas will continue to be the most intensively grazed in any allotment. The Proposed RMP must specify immediate actions on all allotment management plans to assure grazing use is allowed only when riparian areas have been individually assessed and documented as in excellent condition.	See Chapter 2, Management Common to all Alternatives, Livestock Grazing section. The section specifies that the BLM would follow the 1997 <i>Record of Decision for Standards for Rangeland Health and Guidelines for Livestock Grazing Management Final Environmental Impact Statement for Montana and North and South Dakota</i> , which requires riparian areas to achieve or make significant progress toward Proper Functioning Condition and water quality to meet or make significant progress toward achieving Montana State standards. If these standards are not met, and livestock grazing is a significant causal factor, steps must be taken to ensure progress towards meeting standards within one grazing season.
DR-MTDK-MC-13-0121-43	Include a discussion that clearly outlines how existing monitoring and adaptive management mechanisms currently in place as part of the BLM's 2008 Final Supplement to the Montana Statewide Oil and Gas Environmental Impact Statement and Proposed Amendment of the Powder River and Billings Resource Management Plans would be extended to management decisions proposed upon implementation of the RMP.	See Chapter 2, Minerals, Oil and Gas, Action 9 for an explanation.
DR-MTDK-MC-13-0070-3	The Governor of Montana has set up a task force to study the Sage Grouse issue and formulate a plan to enhance their habitat and range. The Draft RMP states on pg. 4-414 : The mineral revenues distributed to the state would be reduced by approximately \$1 million". The \$1 million dollar reduction in revenue to the state of Montana is clearly an indication that the state has a very large stake in what the BLM does in their decision. For this reason the BLM should slow this process down and consider input into this plan from the recommendations of the task force set up by the Governor.	See Chapter 2; Comparison of Alternatives Table 2-5; Fish, Aquatic and Wildlife Habitat, Including Special Status Species section for actions if the State of Montana adopts a GRSG Habitat Conservation Program. The Governor's Advisory Council sage-grouse task force's recommendations have been reviewed in the preparation of the PRMP/FEIS.
DR-MTDK-MC-13-0088-5	The Montana Sage-grouse Habitat Conservation Advisory Council is in the process of developing state-specific approaches to greater sage grouse in the State. The results of that process, and potential alternative conservation measures and management actions to those listed in the Draft RMP, need to be taken into account by the final revisions to the RMP and the Proposed EIS.	See Chapter 2; Comparison of Alternatives Table 2-5; Fish, Aquatic and Wildlife Habitat, Including Special Status Species; GRSG Habitat – Priority Areas, Alternative E (Proposed) for actions if the State of Montana adopts a GRSG Habitat Conservation Program. The Governor's Advisory Council sage-grouse task force's recommendations have been reviewed in the preparation of the PRMP/FEIS.
DR-	The Governor of Montana has set up a task force to study the Sage Grouse	See Chapter 2; Comparison of Alternatives Table 2-5; Fish,

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MTDK-MC-13-0090-10	issue and formulate a plan to enhance their habitat and range. The Draft RMP states on pg. 4-414: The mineral revenues distributed to the state would be reduced by approximately \$1 million." The \$1 million dollar reduction in revenue to the state of Montana is clearly an indication that the state has a very large stake in what the BLM does in their decision. For this reason the BLM should slow this process down and consider input into this plan from the recommendations of the task force set up by the Governor.	Aquatic and Wildlife Habitat, Including Special Status Species; GRSG Habitat – Priority Areas, Alternative E (Proposed) for actions if the State of Montana adopts a GRSG Habitat Conservation Program. The Governor’s Advisory Council sage-grouse task force’s recommendations have been reviewed in the preparation of the PRMP/FEIS.
DR-MTDK-MC-13-0097-29	The Draft RMP states on pg. 3-74 that the "BLM is an active participant in the Montana Sage Grouse Work Group." Montana Governor Bullock established the Greater Sage-grouse Habitat Conservation Advisory Council with Executive Order No. 2-2013. The EIS and RMP should explain how these state efforts will be incorporated into the RMP, and what the process for those future RMP revisions will be.	See Chapter 2; Comparison of Alternatives Table 2-5; Fish, Aquatic and Wildlife Habitat, Including Special Status Species; GRSG Habitat – Priority Areas, Alternative E (Proposed) for actions if the State of Montana adopts a GRSG Habitat Conservation Program. The Governor's Advisory Council input on Greater Sage-grouse was reviewed in the preparation of the PRMP/FEIS.
DR-MTDK-MC-13-0121-28	Will the Governor’s sage-grouse advisory council supplant the Montana Sage Grouse Work Group or will both groups continue to address sage-grouse management? Clarify BLM’s anticipated role in recognizing and/or adopting recommendations of the advisory council as part of revisions to the Draft RMP.	See Chapter 2; Comparison of Alternatives Table 2-5; Fish, Aquatic and Wildlife Habitat, Including Special Status Species; GRSG Habitat – Priority Areas, Alternative E (Proposed) for actions if the State of Montana adopts a GRSG Habitat Conservation Program. The Governor’s Advisory Council sage-grouse task force’s recommendations have been reviewed in the preparation of the PRMP/FEIS.
DR-MTDK-MC-13-0098-6	The National Park Service and the United States Fish and Wildlife Service have asserted that all non-Class I areas under their jurisdiction should be considered to be sensitive Class II areas. The justification used to determine which areas should be considered sensitive Class II areas is unclear. Impacts to sensitive Class II areas would be modeled in the same manner as Class I areas; this is inconsistent with CAA requirements.	See Chapter 3, Air Resources and Climate, Air Quality Related Values section. Sensitive Class II areas are not afforded protection under the CAA.
DR-MTDK-MC-13-0089-55	Research indicates a strong correlation between oil and gas development and increased ozone concentrations, particularly in the summer when warm, stagnant conditions yield an increase in O3 from oil and gas emissions.	See Chapter 3, Air Resources and Climate, Air Quality section; and the Air Resources and Climate Appendix, Miles City Field Office Air Resource Management Plan: Adaptive Management Strategy for Oil and Gas Resources. Monitoring data from ozone monitors within the MCFO indicate ozone concentrations that are no more than 75 percent of the ozone NAAQS
DR-MTDK-MC-13-0089-17	BLM’s quantitative assessment should account for methane’s long-term (100-year) global warming impact and, also, methane’s short-term (20-year) warming impact using the latest peer-reviewed science to ensure that potentially significant impacts are not underestimated or ignored.	See Chapter 3, Air Resources and Climate, Climate Change section, the global warming potential discussion. Also, see the Air Resource Technical Support Document available online on the BLM MCFO RMP webpage: <a href="http://www.blm.gov/mt/st/en/fo/miles_city_field_office/rmp.htm">http://www.blm.gov/mt/st/en/fo/miles_city_field_office/rmp.htm</a>

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DR-MTDK-MC-13-0089-18	<p>EPA's GHG Inventory - which BLM currently relies on in its analysis - assumes that methane is 21 times as potent as carbon dioxide (CO<sub>2</sub>) over a 100-year time horizon, a global warming potential (GWP) based on the Intergovernmental Panel on Climate Change's (IPCC) Second Assessment Report from 1996.2 As a Supplementary Information Report (SIR) prepared for BLM's oil and gas leasing program in Montana and the Dakotas explains, GWP accounts for the intensity of each GHG's heat trapping effect and its longevity in the atmosphere and provides a method to quantify the cumulative effect of multiple GHGs released into the atmosphere by calculating carbon dioxide equivalent (CO<sub>2</sub>e) for the GHGs. pg. AIR 1-2.25 However, substantial questions arise when you calibrate methane's GWP over the 20-year planning and environmental review horizon used in the SIR and, typically, by BLM, including the MCFO. See SIR at 4-1 thru 4-45 (discussing BLM-derived reasonably foreseeable development potential in each planning area). Over this 20-year time period, the IPCC has calculated that methane's GWP is 72 over three times as potent as otherwise assumed by the AIR-26. However, recent peer-reviewed science demonstrates that gas-aerosol interactions amplify methane's impact such that methane is actually 33 times as potent as carbon dioxide over a 100-year time period, and 105 times as potent over a twenty year time period. This information suggests that the near-term impacts of methane emissions have been significantly underestimated. See 40 C.F.R. § 1508.27(a) (requiring consideration of short and long term effects). Further, by extension, BLM is also significantly underestimating the near-term benefits of keeping methane emissions out of the atmosphere. 40 C.F.R. § 1502.16(e), (f); id. at 1508.27.</p>	<p><u>1.</u> See Chapter 3, Air Resources and Climate, Climate Change section, the global warming potential discussion. Also, see the Air Resource Technical Support Document available online on the BLM MCFO RMP webpage: <a href="http://www.blm.gov/mt/st/en/fo/miles_city_field_office/rmp.htm">http://www.blm.gov/mt/st/en/fo/miles_city_field_office/rmp.htm</a> <u>1.</u></p>
DR-MTDK-MC-13-0089-7	<p>The MCFO must consider not only the cumulative impact of the greenhouse gas emissions authorized by the revised RMP, it must also consider those emissions combined with other activity in the area.</p>	<p>See Chapter 3, Air Resources and Climate, Climate Change, Current Conditions section where state, national, and global GHG emission estimates are provided.</p>
DR-MTDK-MC-13-0089-69	<p>There is a vast amount of research and support that BLM has to draw from to address the issues of greenhouse gas pollution and methane waste. BLM is required to impose measures at the lease stage before it transfers rights, and thus commits of resources. The RMP is the appropriate place to address these measures to ensure consistency.</p>	<p>See Chapter 3, Air Resources and Climate, Climate Change, National Actions to Reduce GHGs section. Based on new information available from the USEPA, additional GHG emission data is provided. Also, see the Air Resources and Climate Appendix, Miles City Field Office Air Resource Management Plan: Adaptive Management Strategy for Oil and Gas Resources, section 1.5.2 for additional information on GHG emission reductions and controls.</p>

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DR-MTDK-MC-13-0134-9	In Montana, oil and gas wells can flare for an unlimited amount of time, if they produce less than 100,000 cubic feet of gas per day. This is extremely hazardous for the local air quality and contributes the larger threat of climate change. The RMP should limit the flaring and require green completion systems for all federal wells. According to a 2012 GAO report on natural gas emissions on federal lands, around 40 percent of natural gas estimated to be vented and flared on onshore federal leases could be economically captured with currently available control technologies.	See Chapter 3, Air Resources and Climate, Climate Change, National Actions to Reduce GHGs section. Also, see the Air Resources and Climate Appendix, Miles City Field Office Air Resource Management Plan: Adaptive Management Strategy for Oil and Gas Resources, section 1.5.2 for additional information on GHG emission reductions and controls.
DR-MTDK-MC-13-0098-9	Monitoring information should be updated to reflect the current Air monitoring program. With the exception of the NCORE monitoring station, carbon monoxide monitoring was suspended throughout the state at the end of March 2011. All of the monitors at the Sidney, Birney, and Broadus monitoring stations are designated as State or Local Air Monitoring Station except for PM10 which is designated as a Special Purpose Monitor. The PM2.5 monitoring data for the Sidney, Birney, and Broadus monitoring stations appear to be mixed-up and referencing the wrong station.	See Chapter 3, Air Resources and Climate, Current Conditions section; and the Air Resources and Climate Appendix, Miles City Field Office Air Resource Management Plan: Adaptive Management Strategy for Oil and Gas Resources, Table ARMP-1. Air quality monitoring data have been updated.
DR-MTDK-MC-13-0089-41	It is critical that the MCFO take a hard look at methods to reduce greenhouse gas (GHG) emissions and at how authorizations and management activities will ensure implementation of feasible GHG emission reduction strategies.	See Chapter 3, Air Resources and Climate, National Action to Reduce GHGs section for a summary of EPA's Greenhouse Gas Mandatory Reporting Rule (MRR) data. The BLM has taken a hard look at GHG emissions, based on new data from the USEPA's Greenhouse Gas Mandatory Reporting Rule. Methane emissions from many of the oil and gas potential sources of methane emissions were not reported by operators in the MCFO or were reported in quantities accounting for less than 1 percent of CO2e. MDEQ emission controls also reduce GHG emissions as explained in the Air Resources and Climate Appendix, Miles City Field Office Air Resource Management Plan: Adaptive Management Strategy for Oil and Gas Resources, section 1.5.2.
DR-MTDK-MC-13-0089-42	Considerable information is available to the MCFO about methods to reduce methane emissions. If the MCFO is waiting to address GHG emissions at the APD stage to implement feasible GHG emission reduction strategies, this is a fatal flaw.	See Chapter 3, Air Resources and Climate, National Action to Reduce GHGs section for a summary of EPA's Greenhouse Gas Mandatory Reporting Rule (MRR) data. The BLM has taken a hard look at GHG emissions, based on new data from the USEPA's Greenhouse Gas Mandatory Reporting Rule. Methane emissions from many of the oil and gas potential sources of methane emissions were not reported by operators in the MCFO or were reported in quantities accounting for less than 1 percent of CO2e. MDEQ emission controls also reduce GHG emissions as explained in the Air Resources and Climate Appendix, Miles

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		City Field Office Air Resource Management Plan: Adaptive Management Strategy for Oil and Gas Resources, section 1.5.2.
DR-MTDK-MC-13-0089-45	The EPA Natural Gas STAR measures are recognized as effective, and were developed with industry. There is no reason why BLM should not work to include these measures in the RMP process.	See Chapter 3, Air Resources and Climate, National Action to Reduce GHGs section for a summary of EPA's Greenhouse Gas Mandatory Reporting Rule (MRR) data. The BLM reviewed GHG emissions from oil and gas sources, based on new data from the USEPA's MRR. VOC and methane emissions from many of the oil and gas sources cited by the commenter were not reported by operators in the MCFO or were reported in quantities accounting for less than 1 percent of CO <sub>2</sub> e. MDEQ emission controls also reduce GHG emissions as explained in the Air Resources and Climate Appendix, Miles City Field Office Air Resource Management Plan: Adaptive Management Strategy for Oil and Gas Resources, section section 1.5.2.
DR-MTDK-MC-13-0089-48	The Draft RMP should address how BLM/MCFO can use Subpart W data to identify methane emission sources, not only by identifying reported emissions from the planning area but also by using the GHGRP to become more familiar with significant emissions sources generally. The Draft RMP should also address how BLM/MCFO can use the EPA-prepared U.S. Inventory of GHG Emissions and Sinks to inform implementation of feasible GHG emission reduction strategies and to become more familiar with emissions sources.	See Chapter 3, Air Resources and Climate, National Action to Reduce GHGs section for a summary of EPA's Greenhouse Gas Mandatory Reporting Rule (MRR) data. Data acquired from the MRR is more helpful to the BLM for identifying feasible emission reduction strategies than data contained in the U.S. Inventory of GHG Emissions and Sinks.
DR-MTDK-MC-13-0098-4	The Draft RMP does not address smoke management for wildfires. We recommend incorporating information regarding the Montana-Idaho Interagency Smoke Management Coordination Strategy into the RMP.	See Chapter 3, Air Resources and Climate, Smoke Management section.
DR-MTDK-MC-13-0021-1	What statute and/or regulation directed BLM to manage Greater Sage-grouse habitat this aggressively? Show me where BLM is required by law, statute, regulation.	The Secretary's planning authority, exercised by the BLM, provides wide latitude to manage the public lands in a manner that, in some instances, may be quite protective of certain resources and values. See Chapter 3, Fish, Aquatic and Wildlife Habitat, Including Special Status Species; Special Status Species (Aquatics, Avian and Terrestrial); Special Status Species - Avian; Greater Sage-grouse; Conservation Strategies and Participatory Efforts section. WO Instruction Memorandum 2012-044 requires incorporation of conservation measures to reduce or remove the need to list sage-grouse under the ESA. BLM Manual 6840 addresses improving the condition of special status species and their habitats to a point where special status recognition is no longer warranted.

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DR-MTDK-MC-13-0103-10	Concerning the Sage Grouse issue, please refer to the study Landscape-Scale Factors Affecting Population Dynamics of Greater Sage-Grouse in North-Central Montana, 2001-2004 written by Brendan James Moynahan. The study goes into detail on many interesting points, including the fact that the main cause of nest failure was that of predators. We are asking that the option of controlling the number of predators be considered to increase the Sage-Grouse population.	See Chapter 3, Fish, Aquatic and Wildlife Habitat, Including Special Status Species; Special Status Species (Aquatics, Avian and Terrestrial); Special Status Species - Avian; Greater Sage-grouse; Conservation Strategies and Participatory Efforts; Predation Relationship section for discussion. The BLM does not manage predators. Montana Fish, Wildlife and Parks manages wildlife species and harvest as well as potential transplants of any wildlife species, including predators.
DR-MTDK-MC-13-0104-12	Pg. 3-74 - "Sage-grouse populations decline by 2 percent annually (Connelly, Knick, Schroeder, Stiver, WAFWA 2004)." In the same paragraph the Montana-specific text indicates "The total number of males in these trend areas peaked in 2006 with 988 males. The number of males counted on trend areas declined from 2007 to 2009 but increased in 2010. The overall trend for sage-grouse in trend areas is stable (Beyer et al 2010)." Other cited data is also hard to interpret. Please clarify if the sage-grouse population in the planning area is stable or not.	See Chapter 3, Fish, Aquatic and Wildlife Habitat, Including Special Status Species; Special Status Species (Aquatics, Avian and Terrestrial); Special Status Species - Avian; Greater Sage-grouse; Conservation Strategies and Participatory Efforts; Predation Relationship section for discussion. Montana's populations are relatively stable (Garton et al. 2011).
DR-MTDK-MC-13-0104-14	Pg. 3-76 - "Individual species have different thresholds of fragmentation tolerance; greater sage-grouse have large spatial requirements and eventually disappear from landscapes that no longer contain large patches of habitat while smaller birds like Sprague's pipit can persist in landscapes with smaller patches of habitat because their spatial requirements are smaller." The citation for this information is omitted. This needs to be provided, as the issue of fragmentation is extremely important in determining appropriate stipulations for sage-grouse.	See Chapter 3, Fish, Aquatic and Wildlife Habitat, Including Special Status Species; Limiting Factors for Wildlife section for the reference "Davis 2004".
DR-MTDK-MC-13-0104-15	Pg. 3-79 - "Greater sage-grouse and other sagebrush-obligate species are experiencing a "death by a thousand cuts." BLM is required to present a balanced, unbiased document and statements like this are clearly inappropriate.	See Chapter 3, Fish, Aquatic and Wildlife Habitat, Including Special Status Species; Special Status Species (Aquatics, Avian and Terrestrial); Special Status Species - Avian; Greater Sage-grouse section. This statement has been deleted.
DR-MTDK-MC-13-0104-17	BLM does not define what constitutes a sage-grouse "population." Are all the sage-grouse in the planning area considered to be part of one population?	See Chapter 3, Fish, Aquatic and Wildlife Habitat, Including Special Status Species; Special Status Species (Aquatics, Avian and Terrestrial); Special Status Species - Avian; Greater Sage-grouse; Planning Area Habitat Delineation and Management Classification section for discussion on population. The planning area is entirely within Management Zone 1 which includes the Yellowstone Watershed, Dakotas and Powder River Basin populations.
DR-MTDK-MC-13-	Pg. 4-130. The document seems to assume sage-grouse lek attendance is a reliable index of population numbers and trends. What is the scientific justification for this assumption?	See Chapter 3, Fish, Aquatic and Wildlife Habitat, Including Special Status Species; Special Status Species (Aquatics, Avian and Terrestrial); Special Status Species - Avian; Greater Sage-

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0104-22		grouse; Planning Area Habitat Delineation and Management Classification section for discussion on population.
DR-MTDK-MC-13-0121-27	Please clarify whether (how) consanguinity affects management direction addressed in this Draft RMP. The Montana Sage Grouse Working Group (2005) indicates that Montana sage-grouse are representative of one population with good genetic diversity.	See Chapter 3, Fish, Aquatic and Wildlife Habitat, Including Special Status Species; Special Status Species (Aquatics, Avian and Terrestrial); Special Status Species - Avian; Greater Sage-grouse section for a description on genetics and on-going research utilizing Greater Sage-grouse feather samples to determine consanguinity of birds.
DR-MTDK-MC-13-0121-33	Pg. 3-76. " Individual species have different thresholds of fragmentation tolerance; greater sage grouse have large spatial requirements and eventually disappear from landscapes that no longer contain large patches of habitat while smaller birds like Sprague's pipit can persist in landscapes with smaller patches of habitat because their spatial requirements are smaller." The source of the information (citation) regarding patch size thresholds for sage-grouse is not provided.	See Chapter 3, Fish, Aquatic and Wildlife Habitat, Including Special Status Species, Limiting Factors for Wildlife section for reference Davis, 2004.
DR-MTDK-MC-13-0121-35	Pg. 3-79 " Greater sage-grouse and other sagebrush-obligate species are experiencing a death by a thousand cuts.". Metaphors such as death by a thousand cuts are grossly inappropriate and irresponsible as they can be variously interpreted.	See Chapter 3, Fish, Aquatic and Wildlife Habitat, Including Special Status Species; Special Status Species (Aquatics, Avian and Terrestrial); Special Status Species - Avian; Greater Sage-grouse section. This statement has been deleted.
DR-MTDK-MC-13-0121-37	Populations of sage-grouse are frequently mentioned in the cited reference and in the Draft RMP; however, there is no discussion of what constitutes a sage-grouse population. Are all of the sage grouse in the MCFO planning area one population?	See Chapter 3, Fish, Aquatic and Wildlife Habitat, Including Special Status Species; Special Status Species (Aquatics, Avian and Terrestrial); Special Status Species - Avian; Greater Sage-grouse; Planning Area Habitat Delineation and Management Classification section for discussion on population. The planning area is entirely within Management Zone 1 which includes the Yellowstone Watershed, Dakotas and Powder River Basin populations.
DR-MTDK-MC-13-0136-9	The NTT does not use Manual 6840 or ESA as a foundation upon which to build. In fact, it never even references Manual 6840 or the ESA, nor does it explain the need for an entirely new regulatory approach.	Refer to the NTT report for a description of its scope and status. The BLM considers many kinds of information in its planning process –both that provided by the public, and that provided by its staff and the staff of other agencies. See Chapter 3, Fish, Aquatic and Wildlife Habitat, Including Special Status Species; Special Status Species (Aquatics, Avian and Terrestrial) section; and the Fish, Aquatic and Wildlife Habitat, Including Special Status Species Appendix, where BLM Manual 6840 is referenced.
DR-MTDK-	Pg. 3-66 Correction (2nd to last paragraph): The black-footed ferret ( <i>Mustela frenata</i> ) was listed as an endangered species in 1967 under a precursor to the	See Chapter 3, Fish, Aquatic and Wildlife Habitat, Including Special Status Species; Special Status Species (Aquatics, Avian

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MC-13-0174-7	ESA. This should be <i>Mustela nigripes</i> , not <i>frenata</i> . Pg. 3-146 Correction (under ferret reintroduction): In order for the black-footed ferret to recover, it will be necessary to establish 10 separate self-sustaining populations (not colonies).	and Terrestrial); Special Status Species - Mammals, Black-footed Ferret section; and Special Designation Areas Appendix for changes made to the document.
	The BLM must fully identify and describe the “important resources” in the Carter MLP area. Additionally, the BLM should broaden the list of “important resources” to include all of the resources identified in the Montana State Office’s MLP Assessment of November 2010. Resources identified in that assessment, but not explicitly accounted for in the analysis for the Carter MLP, include: “large intact landscapes” and “dispersed recreational uses.” Montana State Office MLP Assessment (Nov. 2010).	See Chapter 3, for example, the Fish, Aquatic and Wildlife Habitat, Including Special Status Species; Soils; and Vegetation sections for resources in the MLP. See Chapter 2, Comparison of Alternatives Table 2-5, Minerals, Oil and Gas, Proposed Carter MLP Area section for revisions. The MLP for the Carter area is no longer recommended.
DR-MTDK-MC-13-0110-1	Pg. 4-107. Who is going to keep the enclosure areas free of noxious weeds? Enclosures become infested with weeds to the point that the target species of plants are no longer viable.	See Chapter 3, Invasive Species. The BLM is responsible and prioritizes treatment areas by those areas of public access, riparian areas, emergency stabilization and rehab areas, and special status species habitat. Resource objectives determine when enclosures are treated.
DR-MTDK-MC-13-0188-7	No attempts have been made to explain the Bankhead-Jones acquired property, leaving the public believing that these properties are totally owned by the federal government, when they are not.	See Chapter 3, Lands and Realty section for a discussion on Bankhead-Jones lands.
DR-MTDK-MC-13-0112-2	Lands with Wilderness Characteristics are very limited. Adequate inventory and designation of these opportunities were not fully explored in the Miles City RMP. Lands with Wilderness Characteristics are very limited and once lost, can never be replaced. It is therefore emphasized that additional time and study be devoted to fully evaluating areas such as Dead Horse Badlands, Wild Horse Badlands, Powder River, Rough Creek, Wrangler Creek, and Buffalo Creek.	See Chapter 3, Lands with Wilderness Characteristics section. Section 201 of FLPMA under the policy of 6310 – <i>Conducting Wilderness Characteristics Inventory on BLM Lands</i> , requires BLM maintain on a continuing basis an inventory of all public lands and their resources and other values, which includes wilderness characteristics. BLM performed data and on-site reviews as recently as the summer of 2013. See Chapter 2, Comparison of Alternatives Table 2-5, Lands with Wilderness Characteristics section for areas BLM proposes to manage for wilderness characteristics.
DR-MTDK-MC-13-0001-1	Conduct wilderness inventories of Dead Horse Badlands, Corral Creek and Dry Creek, all near Ekalaka; Buck Creek in the Powder River Valley; and Wild Horse Badlands adjoining the C.M. Russell National Wildlife Refuge.	See Chapter 3, Lands with Wilderness Characteristics. BLM performed data and on-site reviews as recently as the summer of 2013. See Chapter 2, Comparison of Alternatives Table 2-5, Lands with Wilderness Characteristics section for areas BLM proposes to manage for wilderness characteristics.
DR-MTDK-MC-13-0109-1	New information about the BLM Wrangler Creek unit, demonstrates that Wrangler Creek has retained its wilderness characteristics.	See Chapter 3, Lands with Wilderness Characteristics. BLM performed data and on-site reviews as recently as the summer of 2013, including for the Wrangler Creek area. See Chapter 2, Comparison of Alternatives Table 2-5, Lands with Wilderness

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		Characteristics section for areas BLM proposes to manage for wilderness characteristics.
DR-MTDK-MC-13-0109-2	The lands adjacent to the Buffalo Creek Wilderness Study Area appear to comply with the criteria for identifying lands with wilderness characteristics as explained in the BLM Manual 6310.	See Chapter 3, Lands with Wilderness Characteristics. BLM performed data and on-site reviews as recently as the summer of 2013. Lands adjacent to the Buffalo Creek WSA have been inventoried by the BLM. Based on the 2013 inventory, Chapter 3 was updated.
DR-MTDK-MC-13-0129-2	Wrangler Creek was disqualified by the BLM as a land with wilderness characteristics because it lacked solitude. In fact, there are ample opportunities for solitude with the trees and other vegetation, rough breaks, and coulees provide screening Opportunities also exist for primitive recreation like camping, hiking, rock hounding, and hunting. As a point of comparison, consider the findings for solitude in the Miles City Wrangler Creek Unit against any number of units within the Lower Sonoran field office. In the latter, the metropolitan area of Phoenix (population: 3.2 million) can be seen from various vantage points within a number of units, though these sights and sounds outside the unit do not create a "pervasive and omnipresent" impact.	See Chapter 3, Lands with Wilderness Characteristics. BLM performed data and on-site reviews as recently as the summer of 2013, including for the Wrangler Creek area. See Chapter 2, Comparison of Alternatives Table 2-5, Lands with Wilderness Characteristics section for areas BLM proposes to manage for wilderness characteristics.
DR-MTDK-MC-13-0169-2	Wild Horse Badlands adjacent to the C.M. Russell National Wildlife Refuge meets BLM's criteria for lands with wilderness characteristics. Although less than 5,000 acres, it meets the size criteria because, as stated in the BLM Manual 6310, an area is of sufficient size if it is large enough to make practical its preservation and use in an unimpaired condition.	See Chapter 3, Lands with Wilderness Characteristics. BLM performed data and on-site reviews as recently as the summer of 2013, including for the Wild Horse Badlands area. See Chapter 2, Comparison of Alternatives Table 2-5, Lands with Wilderness Characteristics section for areas BLM proposes to manage for wilderness characteristics.
DR-MTDK-MC-13-0169-3	Deadhorse Badlands, Corral Creek, and Dry Creek near Ekalaka and Buck Creek in the Powder River Valley meet lands with wilderness characteristics criteria.	See Chapter 3, Lands with Wilderness Characteristics. BLM performed data and on-site reviews as recently as the summer of 2013. See Chapter 2, Comparison of Alternatives Table 2-5, Lands with Wilderness Characteristics section for areas BLM proposes to manage for wilderness characteristics.
DR-MTDK-MC-13-0169-7	Wrangler Creek area possesses wilderness character and should be managed as such. The area is over 5,000 acres in size with no public access for vehicles. In fact, the area is only accessed by foot via the Moorehead road. There are no roads within the area and the old mining sites have been restored. And, the forest stands, native vegetation, rough breaks, and coulees that make up the scenic landscape screen outside noises, provide outstanding opportunities for solitude, and primitive recreational opportunities. The ridges within Wrangler Creek also provide great views of the cottonwood lined Powder River valley. In short, its a great place to camp, hike, rock climb, and hunt.	See Chapter 3, Lands with Wilderness Characteristics. BLM performed data and on-site reviews as recently as the summer of 2013, including for the Wrangler Creek area. See Chapter 2, Comparison of Alternatives Table 2-5, Lands with Wilderness Characteristics section for areas BLM proposes to manage for wilderness characteristics.
DR-	Deadhorse Badlands (MT-024-715): BLM's inventory form states that the area	See Chapter 3, Lands with Wilderness Characteristics. BLM

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MTDK-MC-13-0169-8	is not natural and fails to provide outstanding opportunities for solitude or primitive and unconfined recreation. But the man-made features that do exist on the landscape (stock ponds, fencing, two-tracks) are substantially unnoticeable as defined by BLM Manual 6310. BLM refers to one route in the area as a road, but the route does not show any signs of maintenance. And, even though the area does not provide a high amount of topographic or vegetative screening, the overall size of the area does permit opportunities for solitude.	performed data and on-site reviews as recently as the summer of 2013, including for the Deadhorse Badlands area. See Chapter 2, Comparison of Alternatives Table 2-5, Lands with Wilderness Characteristics section for areas BLM proposes to manage for wilderness characteristics.
DR-MTDK-MC-13-0169-9	Dry Creek (MT-024-709): BLM states this area does not provide outstanding opportunities for solitude, primarily due to the lack of vegetative screening. But the area is approximately 9,200 acres in size which means there is very little, if any, chance of coming into contact with other visitors on a frequent basis. According to BLM's Manual 6310, factors that influence solitude include size, configuration, topographic and vegetative screening, and the ability of the visitor to find seclusion.	See Chapter 3, Lands with Wilderness Characteristics. BLM performed data and on-site reviews as recently as the summer of 2013, including for the Dry Creek area. See Chapter 2, Comparison of Alternatives Table 2-5, Lands with Wilderness Characteristics section for areas BLM proposes to manage for wilderness characteristics.
DR-MTDK-MC-13-0105-6	The RMP states that oil and gas leases are only noticed in the BLM office in Billings. In the case of split estate, the surface owners deserve more respect and the lease sale should be noticed in a newspaper located in the county the development is proposed.	See Chapter 3, Minerals, Leasable Minerals, Oil and Gas section and the Minerals Appendix, Fluid Minerals, Leasing Process section regarding the 2010 leasing reform that includes public involvement at all stages.
DR-MTDK-MC-13-0162-6	The 2010 Energy Lease Reforms should be fully implemented; it is hard to tell if this RMP does that.	See Chapter 3, Minerals, Leasable Minerals, Oil and Gas section; and the Minerals Appendix, Fluid Minerals, Leasing Process section regarding the 2010 leasing reform, WO IM No. 2010-117.
DR-MTDK-MC-13-0097-19	Page MIN-100 states: "There are currently no active carbon dioxide EOR projects in the planning area .... " This statement is now outdated.	See Chapter 3, Minerals, Leasable Minerals, Oil and Gas, Conventional Oil and Gas section where the Bell Creek CO2 EOR project is included. See the Minerals Appendix, Fluid Minerals section for revisions.
DR-MTDK-MC-13-0097-11	The Draft RMP does not disclose the amount or location of existing oil and gas leases. This makes review and comment on the effect proposed management designations will have on existing lease development difficult.	See Chapter 3, Minerals, Leasable Minerals, Oil and Gas, Historical Drilling and Leasing Activity, Existing Leases section for the acres of existing oil and gas leases as of February 2014. Also, see several sections in the front of Chapter 2; for example, under the directions "How To Read Table 2-5" for discussion on valid existing rights.
DR-MTDK-MC-13-0104-4	BLM has failed to disclose data on the number of acres currently leased.	See Chapter 3, Minerals, Leasable Minerals, Oil and Gas, Historical Drilling and Leasing Activity, Existing Leases section for acres of existing oil and gas leases as of February 2014.
DR-	The RMP does not distinguish the difference between acres leased for minerals.	See Chapter 3, Minerals, Leasable Minerals, Oil and Gas,

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MTDK-MC-13-0105-4	It only states the acreage that will be offered for leasing. The Federal government retained many of the minerals under the lands in Montana. The surface is often owned by private individuals. The RMP should state how many minerals are under BLM land versus how many are under privately owned surface.	Historical Drilling and Leasing Activity, Existing Leases section for acres of existing oil and gas leases as of February 2014.
DR-MTDK-MC-13-0134-2	Through the RMP, the BLM should make sure that stronger casing and cementing standards are in place. These standards are currently included in the draft chemical disclosure and well stimulation rules just released by the BLM.	See Chapter 3, Minerals, Oil and Gas; and the Minerals Appendix, Fluid Minerals section for changes. All well casing and cementing operations that occur on Federal/Indian lands would be reviewed and approved by BLM and conducted in accordance with the applicable requirements specified in Onshore Oil and Gas Order No. 2, other BLM regulations, and the American Petroleum Institute (API) standards.
DR-MTDK-MC-13-0152-1	Any change in land management will cause significant socio-economic impacts to the State, County, and Local governments and to the oil and gas industry. A full economic analysis should be conducted and the economic impacts (\$) by Alternative should be clearly outlined	See Chapter 3, Social and Economic section for the description of social, economic and environmental justice conditions and trends and the description of social, economic and environmental justice impacts in Chapter 4, Social and Economic, Economics section, which describes changes in employment, income, in various private sectors and changes to social conditions including effects from changes in anticipated oil and gas activity.
DR-MTDK-MC-13-0164-3	Include the economic impacts the Proposed RMP would have on small towns, local businesses, agriculture, and property values. Include an analysis of the impacts the RMP would have on private property rights, land values, land access, agricultural permitting, surface use and any other use of private property that may be inhibited as a result of this the Proposed RMP. Include the impacts of lost agricultural production as a result of the RMP, increases in unemployment rates, decreases in private sector job opportunities, and the negative impacts of additional restrictions on energy and natural resource development efforts.	See Chapter 3, Social and Economic section, for the description of social, economic and environmental justice conditions and trends; and their impacts in Chapter 4, same section.
DR-MTDK-MC-13-0090-8	On pg. 3-159 of the Draft RMP it states that jobs in agriculture make up 18 percent and on pg. 3-160 of the Draft RMP it states that employment in recreation and tourism make up another 42 percent of the jobs. This total of 60 percent shows the large majority of jobs in the planning area are from agriculture and recreation. On pg. 3-163 of the Draft RMP the matrix chart reflects the usage types for recreation. Your conclusion from this table reflects more than 60 percent of the use is driven by fish and wildlife. You use this determination to bolster your conclusion of the importance of wildlife and does not accurately reflect the importance of access. I believe your analysis of the information in the chart on pg. 3-163 is flawed.	See Chapter 3, Social and Economic section, Social and Economic, Economics for revisions.

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DR-MTDK-MC-13-0126-4	Chapter 3, pg. 45. Vegetation Hardwood draws are given their own section under vegetation in Chapter 2 but are not mentioned in Chapter 3.	See Chapter 3, Vegetation, Hardwood Draws section for added text.
DR-MTDK-MC-13-0126-6	Chapter 3, pg. 45, Shrublands <i>Artemisia tridentata</i> ssp. <i>tridentata</i> , <i>A. tridentata</i> <i>vaseyana</i> , <i>A. nova</i> , and <i>Purshia tridentatado</i> do not occur on the MCFO lands.	See Chapter 3, Vegetation, Plant Communities section for revisions.
DR-MTDK-MC-13-0117-8	In certain areas of the Draft RMP the BLM states that there are 2.8 million surface acres that it administers, but at pg. 3-45 of the Draft RMP , the BLM states that grasslands cover 3.6 million of BLM's administered acres. There seems to be an error.	See Chapter 3, Vegetation, Plant Communities section; the 3.6 million acre number has been removed.
DR-MTDK-MC-13-0146-2	Pg. 3-45, Plant Communities/Grasslands: this sentence states that there are 3.6 million acres administered in the planning area. Is this correct?	See Chapter 3, Vegetation, Plant Communities section; the 3.6 million acre number has been removed.
DR-MTDK-MC-13-0126-7	Chapter 3, pg. 47 Table 3-47 <i>Astragalus aretioides</i> , <i>Cleomeleuiea</i> , <i>Erigeron aliocotus</i> , <i>Grayia spinosa</i> , and <i>Sullivantia hapemani</i> do not occur in the MCFO area and are not likely to occur there.	See Chapter 3, Vegetation, Plant Species of Concern section for revisions.
DR-MTDK-MC-13-0126-3	Chapter 3, pg. 29, Surface water. There is no mention of the numerous stock pond impoundments that are present on BLM lands in eastern Montana. These impoundments trap surface water during spring runoff that would otherwise help to cause the downstream flooding that is necessary for the regeneration of cottonwood and willow habitats which, in turn, support numerous species of wildlife.	See Chapter 3, Water Resources, Surface Water section for discussion.
DR-MTDK-MC-13-0134-4	While the RMP thus affirms the importance of water, almost nowhere in the document are the impacts to water quantity from oil and gas development directly addressed and mitigated through the alternatives. The BLM has not yet documented the amount of water used for federal oil and gas drilling to date. This needs to be done. One resource that may be of use to the BLM is the draft USGS study on the availability of groundwater in the Williston and Powder River Basins.	See Chapter 3, Water Resources, tables showing the 2005 surface and groundwater withdrawals for counties in the planning area. These tables show the volume of water withdrawn from surface water and groundwater sources for all uses. The USGS is currently investigating the regional aquifers of the Williston and Powder River structural basins in order to evaluate different water-use and energy-development scenarios, but the results of these associated studies are not yet available. Although Onshore Oil and Gas Order Number 1 requires operators to disclose the source for all water anticipated for use in drilling the proposed well, operators are not required to disclose the volume of water used to drill the proposed well.

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DR-MTDK-MC-13-0190-8	There are numerous references to waters that are "impaired," "threatened," "on the 303(d) list," and "on the 305(b) list." In some cases, it may be simpler to just refer to waters that are on "Montana's 2012 List of Impaired Waters." This list can be found in Appendix A of Montana's 2012 Water Quality Integrated Report. The list includes all waters for which there are known impairments. A copy of Appendix A can be downloaded from the following website: <a href="http://cwaic.mt.gov/wq_reps.aspx?yr=2012qryId=100667">http://cwaic.mt.gov/wq_reps.aspx?yr=2012qryId=100667</a> .	See Chapter 3, Water Resources, Water Quality section and the Water Appendix, Impaired Waterbodies in the Planning Area section for changes in the text.
DR-MTDK-MC-13-0190-1	The "2007 Montana Nonpoint Source Management Plan" is obsolete. It was replaced by the "2012 Montana Nonpoint Source Management Plan". The 2012 plan is available for download at the following DEQ website: <a href="http://deq.mt.gov/wqinfo/nonpoint/NonpointSourceProgram.mcp">http://deq.mt.gov/wqinfo/nonpoint/NonpointSourceProgram.mcp</a> .	See Chapter 3, Water Resources, Water Quality section for updated text.
DR-MTDK-MC-13-0190-2	The "Draft Redwater River Nutrient and Salinity TMDLs and Framework Water Quality Improvement Plan (2010)" has been finalized. The final document is titled "Redwater River Nutrient and Salinity TMDLs and Framework Water Quality Improvement Plan". It is available for download at the following DEQ website: <a href="http://www.deq.mt.gov/wqinfo/TMDL/finalReports.mcp">http://www.deq.mt.gov/wqinfo/TMDL/finalReports.mcp</a> .	See Chapter 3, Water Resources, Water Quality section for updated text.
DR-MTDK-MC-13-0102-16	Update the reference on pg. 3-42 to the Northern Cheyenne Tribe's water quality standards, which were approved by the EPA on March 21, 2013, with no action taken on the electrical conductivity (EC) and sodium absorption ratio (SAR) criteria. The approved standards apply to all Reservation surface waters. BLM can also direct the reader to the following link for more information from the Northern Cheyenne website: <a href="http://www.cheyennation.com/water.html">http://www.cheyennation.com/water.html</a> .	See Chapter 3, Water Resources, Water Quality section. The text of the analysis has been changed.
DR-MTDK-MC-13-0190-3	DEQ's 2010 Water Quality Integrated Report (303(d)/305(b)) is now obsolete. It has been replaced by the 2012 Water Quality Integrated Report. A copy of the 2012 report can be downloaded from the following website: <a href="http://cwaic.mt.gov/wq_reps.aspx?yr=2012qryId=100667">http://cwaic.mt.gov/wq_reps.aspx?yr=2012qryId=100667</a> .	See Chapter 3, Water Resources, Water Quality section; and the Water Appendix, Tables 2 and 3 and the Impaired Waterbodies in the Planning Area section for modifications made to include data from the 2012 Water Quality Integrated Report.
DR-MTDK-MC-13-0102-15	Reference Montana's 2012 Clean Water Act(CWA) Section 303(d) Impaired Waters List, as approved by the EPA, and discuss water quality trends observed between 2010 and 2012 to more fully describe current conditions in, and downstream of, the planning area. If MDEQ has not assessed the water quality in all waterbodies within the planning area, then list such waterbodies and indicate that the water quality condition has not yet been assessed by MDEQ.	See Chapter 3, Water Resources, Water Quality section; the Impaired Waterbodies in the Planning Area section in the Water Appendix, and Impaired Streams and Rivers, Reservoirs and Lakes tables in the Water Appendix. They have been modified to include data from the 2012 Water Quality Integrated Report. Information for waterbodies not listed as impaired in the Water Appendix of the PRMP/FEIS may be accessed via Montana DEQ's Clean Water Act Information Center at: <a href="http://cwaic.mt.gov">http://cwaic.mt.gov</a> .
DR-MTDK-	Water Appendix, pg. WAT-6, Table 2. The information in this table comes from the 2010 Montana List of Impaired Waters. The 2012 List is the most	See Chapter 3, Water Resources, Water Quality section; the Impaired Waterbodies in the Planning Area section in the Water

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MC-13-0190-12	current.	Appendix, and Tables 2 and 3 in the Water Appendix. They have been modified to include data from the 2012 Water Quality Integrated Report.
DR-MTDK-MC-13-0117-33	Though the Draft RMP states, "BLM resources management would impact local economy's dependence on the livestock industry, oil and gas exploration and production, coal mining, and recreation activities" the Draft RMP does not provide any further analysis of the economic impacts.	See Chapter 4 for analyses from BLM's proposed actions.
DR-MTDK-MC-13-0136-7	Include a detailed socioeconomic analysis of the impacts related to locatable minerals.	See Chapter 4 for analyses from BLM's proposed actions. <b>Mineral Development:</b> Leasing and development of federal minerals would continue under all alternatives. Continued mineral development within the MCFO includes crude oil, natural gas, coal, and bentonite. The amount of bentonite mined on federal lands is a function of market demand, more so than a function of amount of land available to mine. Over the next 20 years, market demand for bentonite is anticipated to remain relatively constant. Nominal increases in market demand for bentonite are anticipated to result in static production with annual production on BLM-administered lands within the MCFO ranging between 300,000 to 350,000 tons per year under all alternatives. Bentonite is a locatable mineral and the federal government collects \$2.8 million from bentonite mining activities within the MCFO.
DR-MTDK-MC-13-0053-1	1. Prairie County was not responsible for the Miles City District Draft RMP being at least 2 years behind schedule according to our MOU for Cooperative Agency. 2. The BLM has no legal responsibility to meet a court-ordered deadline that was directed to the U. S. Fish and Wildlife Service. 3. The BLM's directive does not come from USFWS, but rather FLPMA. 4. USFWS has the responsibility to implement the ESA and not the BLM. 5. The Miles City District Planning Team did not do or address the regulations that are part of your "Desktop Guide to Cooperative Agency Relations". Satisfaction of the regulations is a requirement of NEPA. 43 CFR 1610.3-2. and 40 CFR 1502.16 (CEQ)[The environmental consequences section of the EIS] shall include discussions of ... (c) Possible conflicts between the proposed action and the objectives of Federal, regional, State, and local (and in the case of a reservation, Indian tribe) land use plans, policies and controls for the area concerned. 40 CFR 1506.2 (CEQ)(d). To better integrate environmental impact statements into state and local planning processes, statements shall discuss any inconsistency of a proposed action with any approved state or local plan or	See Chapter 4 for the anticipated impacts from BLM's proposed actions. See Chapter 5, Consistency section for inconsistencies identified between the PRMP/FEIS and available county growth plans.

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	laws (whether or not federally sanctioned). Where an inconsistency exists, the statement should describe the extent to which the agency's would reconcile its proposed action with the plan or law.	
DR-MTDK-MC-13-0085-3	40 CFR 1502.16 (CEQ) . [The environmental consequences section of the EIS] shall include discussions of.. c) Possible conflicts between the proposed action and the objectives of Federal, Regional, State and local (and in the case of a reservation, Indian tribe) land use plans, policies and controls for the area concerned.	See Chapter 4 for the anticipated impacts from BLM's proposed actions. See Chapter 5, Consistency section for inconsistencies identified between the PRMP/FEIS and available county growth plans.
DR-MTDK-MC-13-0149-1	43 CFR 1610.3-2 (BLM) Consistency requirements (a) Guidance and resource management plans and amendments ... shall be consistent with officially approved or adopted resource related plans, and the policies and programs contained therein, of other Federal agencies, State and local governments, and Indian tribes, so long as the guidance and resource management plans are also consistent with the purposes, policies, and programs of Federal laws and regulations applicable to public lands. 40 CFR 1502.16 (CEQ) [The environmental consequences section of the EIS] shall include discussions of... (c) Possible conflicts between the proposed action and the objectives of Federal, regional, State, and local (and in the case of a reservation, Indian tribe) land use plans, policies and controls for the area concerned. 40 CFR 1506.2 (CEQ) (d) To better integrate environmental impact statements into state and local planning processes, statements shall discuss any inconsistency of a proposed action with any approved state or local plan or laws (whether or not federally sanctioned). Where an inconsistency exists, the statement should describe the extent to which the agency's would reconcile its proposed action with the plan or law.	See Chapter 4 for the anticipated impacts from BLM's proposed actions. See Chapter 5 Consistency section for inconsistencies identified between the PRMP/FEIS and available county growth plans.
DR-MTDK-MC-13-0193-3	40 CFR 1502.16 (CEQ)[The environmental consequences section of the EIS] shall include discussions of...(c) Possible conflicts between the proposed action and the objectives of Federal, regional, State, and local (and in the case of a reservation, Indian tribe) land use plans, policies and controls for the area concerned.	See Chapter 4 for the anticipated impacts from BLM's proposed actions. See Chapter 5, Consistency section for inconsistencies identified between the PRMP/FEIS and available county growth plans.
DR-MTDK-MC-13-0130-8	The BLM does no analysis of the projected methane emissions from coal mining, stating that Methane emissions from proposed new or expanded coal mines would be estimated as part of project-level planning, and emission reduction measures would be considered. BLM needs to account for methane emissions of the potential coal mines in the resource planning area and revise the RMP.	See Chapter 4, Air Resources and Climate, alternative-specific emission inventories sections for methane emissions included. Also, detailed emission inventories are included within the Air Resources and Climate Appendix, Air Resource Technical Support Document.
DR-MTDK-	Even if science cannot isolate each additional gas well contribution to overall emissions, this does not obviate BLM's responsibility to consider oil and gas	See Chapter 4, Air Resources and Climate, alternative-specific sections, where aggregate GHG emissions for each alternative

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MC-13-0089-10	development in the MCFO from the cumulative impacts of the oil and gas sector.	are provided. Detailed emission inventories are provided in the <i>Air Resource Technical Support Document</i> .
DR-MTDK-MC-13-0089-16	BLM does not provide any consideration of the relationship between GHG emissions and the RMP decision made, and fails to address or identify any alternatives or mitigation of GHG emissions from oil and gas development in the Miles City RMP.	See Chapter 4, Air Resources and Climate, alternative-specific sections and the Air Resources and Climate Appendix, Air Resource Technical Support Document for GHG emission inventories. GHG BMPs are provided in the Mitigation Measures and Conservation Actions Appendix. Note, the USEPA and MDEQ require emission controls that reduce GHG emissions, as described in the Chapter 3, "Air Resources and Climate," "Climate Change," "National Actions to Reduce GHGs" section and the Air Resources and Climate Appendix, Miles City Field Office Air Resource Management Plan: Adaptive Management Strategy for Oil and Gas Resources, section 1.5.2.
DR-MTDK-MC-13-0089-19	The methane emission estimates are important given the noted importance of near term action to ameliorate climate change - near term action that scientists say should focus, inter alia, on preventing the emission of short-lived but potent GHGs like methane while, at the same time, stemming the ongoing increase in the concentration of carbon dioxide. These uncertainties necessitate analysis in the Miles City RMP.	See Chapter 4, Air Resources and Climate, alternative-specific sections and the Air Resources and Climate Appendix, Air Resource Technical Support Document for GHG emission inventories. GHG BMPs are provided in the Mitigation Measures and Conservation Actions Appendix. Note, the USEPA and MDEQ require emission controls that reduce GHG emissions, as described in the Chapter 3, "Air Resources and Climate," "Climate Change," "National Actions to Reduce GHGs" section and the Air Resources and Climate Appendix, Miles City Field Office Air Resource Management Plan: Adaptive Management Strategy for Oil and Gas Resources, section 1.5.2.
DR-MTDK-MC-13-0089-20	BLM has an opportunity to improve our knowledge base regarding GHG emissions from oil and gas production. Take the requisite hard look NEPA analysis before selling and executing oil and gas leases.	See Chapter 4, Air Resources and Climate, alternative-specific sections and the Air Resources and Climate Appendix, Air Resource Technical Support Document for GHG emission inventories. GHG BMPs are provided in the Mitigation Measures and Conservation Actions Appendix. Note, the USEPA and MDEQ require emission controls that reduce GHG emissions, as described in the Chapter 3, "Air Resources and Climate," "Climate Change," "National Actions to Reduce GHGs" section and the Air Resources and Climate Appendix, Miles City Field Office Air Resource Management Plan: Adaptive Management Strategy for Oil and Gas Resources, section 1.5.2. Also, the requisite level of information necessary

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		to make a reasoned choice among the alternatives in an EIS is based on the scope and nature of the proposed decisions. As the PRMP/FEIS analyzes land use planning-level decisions, which by their nature are broad in scope, the requisite level of data and information is more generalized in order to apply a wide-ranging landscape perspective. Although the BLM realizes that more data and more site-specific data could always be gathered, the baseline data used in the EIS provides the necessary basis to make informed land use plan-level decisions.
DR-MTDK-MC-13-0089-25	Emissions from oil and gas development are not limited only to combustion, rather they occur throughout the chain of production - with some of the greatest emissions occurring at the point of extraction. These impacts are a consequence of various stages of oil and gas development from the drilling and fracking of oil and gas wells, to air quality impacts and the release of hazardous emissions. The MCFO has failed to sufficiently address and analyze these impacts.	See Chapter 4, Air Resources and Climate, alternative-specific sections. Emissions from non-combustion sources are included in the emission inventories provided for each Alternative. Detailed emission inventories are provided in the <i>Air Resource Technical Support Document</i> . Air resource impacts associated with these emissions are explained in Chapter 4, Air Resources and Climate.
DR-MTDK-MC-13-0089-37	In addition to the cumulative effects of conventional air pollution, energy development in the region is causing significant GHG pollution in the form of methane emissions. BLM must consider the cumulative impacts of oil and gas and coal development in the area.	See Chapter 4, Air Resources and Climate, alternative-specific sections. Methane emissions for each alternative are provided. Detailed emission inventories are provided in the Air Resources and Climate Appendix, Air Resource Technical Support Document.
DR-MTDK-MC-13-0098-8	The Draft RMP states that the oil and gas emission inventories were generally based on emission standards required by DEQ and EPA. The Draft RMP identifies new Federal regulations and states that the oil and gas emission inventories will be updated in the Proposed RMP to address these regulatory changes. However it is not clear if BLM considered DEQ's reasonable precautions or emission control requirements in the inventory development.	See Chapter 4, Air Resources and Climate, alternative-specific sections and the Air Resources and Climate Appendix, Air Resource Technical Support Document. Emission inventories have been updated to reflect additional MDEQ regulations.
DR-MTDK-MC-13-0121-10	The MCFO should take into account the reduction in emissions associated with the New Source Performance Standards (NSPS) 1 and the National Emission Standards for Hazardous Air Pollutants (NESHAP) 1 also known as Maximum Achievable Control Technology (MAST) standards.	See Chapter 4, Air Resources and Climate, alternative-specific sections and the Air Resources and Climate Appendix, Air Resource Technical Support Document. Emission inventories have been updated to reflect recent EPA and additional MDEQ regulations.
DR-MTDK-MC-13-0121-7	The GHG emissions predicted by BLM are higher than actual because federally approved regulations that were already designed to reduce GHGs were not taken into account.	See Chapter 4, Air Resources and Climate, alternative-specific sections and the Air Resources and Climate Appendix, Air Resource Technical Support Document. Emission inventories have been updated to reflect recent EPA regulations that will reduce GHG emissions.

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DR-MTDK-MC-13-0121-14	Pg. 4-14. The Draft RMP discusses the fact that AQRV analysis will be fully conducted using the CALPUFF and PGM modeling results. There is would be no opportunity afforded the public to comment on this analysis.	See Chapter 4, Air Resources and Climate, AQRV Impacts section and in the Air Resource Technical Support Document for the CALPUFF modeling methodology and results. PGM methodologies and results are provided to the public via the MCFO website.
DR-MTDK-MC-13-0167-3	In the discussion of all the Chapter 4 alternatives, it states that future PGM modeling will be used. The statements should reference both limited AQRV analysis that will occur now and the PGM modeling analysis that will occur in the future to evaluate potential air impacts.	See Chapter 4, Air Resources and Climate, AQRV Impacts section. Results of the limited visibility analysis performed after completion of the Draft RMP/EIS are provided.
DR-MTDK-MC-13-0089-36	In addition to the cumulative land disturbance from energy development in the region, BLM has failed to consider the cumulative impacts of air pollution caused by this development.	See Chapter 4, Air Resources and Climate, Cumulative Impacts section; and the Air Resources and Climate Appendix, Miles City Field Office Air Resource Management Plan: Adaptive Management Strategy for Oil and Gas Resources, section 5.1. Cumulative air pollution impacts are addressed qualitatively based on available data.
DR-MTDK-MC-13-0089-5	By dismissing the additional contributions of air pollutants as negligible or a small contribution to a percentage of the NAAQS, the MCFO also fails to consider the cumulative impacts of air pollution caused by the oil and gas development. Include operations at the Colstrip coal-fired power plant, which uses coal from the Rosebud Mine. Colstrip causes significant air pollution, including emissions of sulfur dioxide (SO2).	See Chapter 4, Air Resources and Climate, Cumulative section for discussion of air quality and AQRV cumulative impact analysis; as well as the discussion of future cumulative modeling in the <i>Air Resources and Climate Appendix</i> , "Air Resource Management Plan," "Future Modeling" section.
DR-MTDK-MC-13-0089-3	The MCFO's preferred alternative calls for oil and gas activity that would add to regional emissions, with emission increases up to at least 47 percent. Draft EIS at pg. 4-7 - 4-8. Although the MCFO has modeled some of the air quality impacts, it dismissed many of the admitted increases as negligible because they will not exceed NAAQS. Draft EIS at pg. 4-13 - 4-14. This analysis does not consider, as the MCFO notes, more localized impacts that may be much greater, or more constant. The impacts of these shorter term and more localized impacts should not be discounted.	See Chapter 4, Air Resources and Climate, Near-field Criteria Air Pollutant Concentrations from Oil and Gas Activities section and the Air Resources and Climate Appendix, <i>Air Resource Technical Support Document</i> . Localized air quality impacts were predicted via AERMOD modeling, which assessed local impacts of oil and gas drilling, completion, construction, and production activities.
DR-MTDK-MC-13-0097-21	The BLM's appropriate role in addressing air quality in land use plans is to "provide for compliance with applicable pollution control laws, including State and Federal air, water, noise, or other pollution standards or implementation plans." 43 U.S.C. § 1712(c)(8). The proposed air quality mitigation requirements do not simply "provide for compliance" with applicable MDEQ air emission regulation. Instead, they supersede and displace the state regulatory authority. For example, proposed mitigation includes requirements to implement particular control technologies, utilize particular types of fuel, and use only certain types of engine technology. See pg. ARMP-16 through	See Chapter 4, Air Resources and Climate, Near-field Criteria Air Pollutant Concentrations from Oil and Gas Activities section for an explanation of Tier 2 versus Tier 4 modeled impacts. Also see Air Resources and Climate Appendix, Miles City Field Office Air Resource Management Plan: Adaptive Management Strategy for Oil and Gas Resources, section 1.5.3.

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	ARMP-19.	
DR-MTDK-MC-13-0102-1	BLM conducted near-field modeling to disclose potential impacts to the National Ambient Air Quality Standards (NAAQS) in the MCFO planning area. However, it appears that the 3-hr SO <sub>2</sub> NAAQS analysis was omitted from the near-field modeling runs for the Draft RMP although it was included in the modeling protocol agreed to through the AQTW.	See Chapter 4, Air Resources and Climate, Near-field Criteria Air Pollutant Concentrations from Oil and Gas Activities section where modeling results for the 3-hr SO <sub>2</sub> standard are included.
DR-MTDK-MC-13-0108-21	With respect to the BLM's proposal to require Tier 4 engines on diesel-powered drill rigs, id. at pg. 4-7: Whether such extraordinary emission controls on equipment are necessary to protect air quality should be based upon model-predicted impacts as they compare to applicable EPA-established air quality standards and prevention of significant deterioration increments; BLM should not presume that such controls are necessary before their actual need is demonstrated. Additionally, in Montana, the Montana DEQ is charged with the monitoring and protection of air quality, including on federal surface, under the authority of its EPA-approved Clean Air Act program.	See Chapter 4, Air Resources and Climate, Near-field Criteria Air Pollutant Concentrations from Oil and Gas Activities section for an explanation of Tier 2 versus Tier 4 modeled impacts. Also, see the Air Resources and Climate Appendix, Miles City Field Office Air Resource Management Plan: Adaptive Management for Oil and Gas Resources, section 1.5.3.
DR-MTDK-MC-13-0121-13	The State already successfully manages an EPA approved air quality program; and, it has been demonstrated the oil and gas activities with the planning area will not result in diminished air quality. Consequently, the requirement to implement Tier 4 engines is unnecessary, exceeds BLM's statutory authority and must, therefore, be eliminated.	See Chapter 4, Air Resources and Climate, Near-field Criteria Air Pollutant Concentrations from Oil and Gas Activities section for an explanation of Tier 2 versus Tier 4 modeled impacts. See Chapter 2, Comparison of Alternatives Table 2-5, Air Resources and Climate, Alternatives A – E for proposed management of Tier 4 engines. Also see the Air Resources and Climate Appendix, Miles City Field Office Air Resource Management Plan: Adaptive Management for Oil and Gas Resources, section 1.5.3.
DR-MTDK-MC-13-0121-8	The numbers documented in the Draft RMP show exceedances of PSD increments. The analysis is not appropriate for evaluating air quality impacts and must be removed from the document. It is the responsibility of MDEQ to implement the PSD permitting program for major sources.	See Chapter 4, Air Resources and Climate, Near-field Criteria Air Pollutant Concentrations from Oil and Gas Activities section. The PSD increment analysis is not a regulatory analysis and is presented only to provide context.
DR-MTDK-MC-13-0089-54	The MLP process provides another mechanism for the MCFO to address air quality impacts, including greenhouse gas pollution, from oil and gas operations. MCFO should consider, in an MLP, the impacts to air quality from oil and gas development in the area, areas where development should be limited or prohibited, and stipulations to reduce or capture emissions where development is allowed.	See Chapter 4, Air Resources and Climate. Climate change impacts and near-field/far-field air resource impacts are addressed throughout the planning area. See Chapter 2, Minerals section. The MLP is no longer recommended under the PRMP/FEIS.
DR-MTDK-MC-13-0167-2	VISCREEN is addressed in the Appendix, but is not described in Chapter 4. The "Far-field AQRV Impacts" section should be renamed to "AQRV Impacts" and should include the commitment to perform near-field analysis.	See Chapter 4, Air Resources and Climate. This section has been revised to modify the heading and include a summary of VISCREEN results.

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DR-MTDK-MC-13-0142-13	There is little explanation of what constitutes the specific type of projects being disclosed. For example, does the term "pipeline" refer to only gathering lines in an oil and gas field? What does the "ROW" category include? Does the term "Major Pipeline" refer only to interstate pipelines? Does Table 4-1 limit the number of acres and projects listed for the life of the RMP?	See Chapter 4, Analytical Assumptions section for revisions. Also, see Table 1 in the Disturbance Appendix for more information.
DR-MTDK-MC-13-0142-14	Will Table 4-1 impose a limit on the amount of surface disturbance for the various categories of activities?	See Chapter 4, Analytical Assumptions section. Assumptions are made only for the purpose of analysis and do not represent potential RMP decisions.
DR-MTDK-MC-13-0130-13	The Draft RMP mentions cumulative impacts of those pertaining to the Nelson Creek Project (near Circle, Montana, in McCone County), a 500-megawatt, lignite burning, coal-fired power plant that is completely defunct and has been moved to North Dakota, yet there is not one mention of the second largest coal fired power plant in the Nation, the Colstrip Power Plant, a 2700 megawatt plant, more than 5 times the size of the proposed Nelson Creek project.	See Chapter 4, Analytical Assumptions, Type of Impacts, Cumulative Impacts section for revisions. The Nelson Creek Project has been removed from the list. The power plant in Colstrip is considered in the effects to air. See the Air Resources and Climate Appendix.
DR-MTDK-MC-13-0108-15	In Chapter 4 of the Draft RMP/EIS, the discussion of the various RMP alternative impacts on coal resources is very difficult to follow because different information is disclosed for each alternative. The RMP should be revised so that a true comparison of impacts can be made.	See Chapter 4, Coal section for revisions.
DR-MTDK-MC-13-0176-5	Address the cumulative effects of the Tongue RR, oil drilling, CBM and coal mining, increased development associated with increasing human population.	See Chapter 4, Cumulative Impacts sections for cumulative effects assessed.
DR-MTDK-MC-13-0089-34	NEPA requires BLM MCFO to look at the cumulative impacts of the Proposed Action. See 40 C.F.R. § 1508.25. Failure to include cumulative impacts of all the mineral development authorized by the Miles City RMP segments the process of coal, oil and gas development into many mini-NEPAs. This practice, in turn, has the effect of hiding the fact that the cumulative impacts of all the segments are significant.	See Chapter 4, Environmental Consequences. Cumulative effects to resources from mineral development are found at the end of each of the Resource topics.
DR-MTDK-MC-13-0090-31	Sage Grouse populations have flourished because of the benefit of agriculture to their habitat. These improvements include grains and seeds from agriculture production, water facilities and haystacks for feeding and cover. All these benefits must be recognized and the Sage Grouse strategy must include a cost benefit analysis of the restrictions or potential removal of agriculture on the landscape.	See Chapter 4, Fish, Aquatic and Wildlife Habitat, Including Special Status Species section for effects to Greater Sage-grouse habitat, including the cumulative effects.
DR-MTDK-MC-13-	Pg. 4-135 -"In some areas, such as the Cedar Creek Anticline, decreased male sage-grouse lek attendance has exceeded 80 percent, which is largely attributed to oil and gas development." What is the citation for this information?	See Chapter 4, Fish, Aquatic and Wildlife Habitat, Including Special Status Species section for modifications.

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0104-24		
DR-MTDK-MC-13-0104-28	Pg. 4-165. If it is assumed that male lek attendance is an index of population status, then the logic would be that a small lek would equate to a small population and a large lek would equate to a large population, as a direct proportion. If this is not the case what is the relationship between numbers of males on a lek and population status? Why would large leks be a better indicator of population status than small leks?	See Chapter 4, Fish, Aquatic and Wildlife Habitat, Including Special Status Species section. Large leks (more than 25 males) are needed to keep Greater Sage-grouse on the landscape (see Taylor et al. 2010) and, continue to be the best indicator of population status.
DR-MTDK-MC-13-0104-32	On pgs. 4-136, 4-140, 4-146, 4-154, 4-161, in the Environmental Consequences, Fish and Wildlife, Terrestrial section, there is a sentence included under each alternative which says "The oil and gas RFD for this RMP predicts development of 278 CBNG wells, which would disturb an estimated 134 acres." Given the different restrictions on leasing acreage, NSO stipulations, and CSU stipulations, there is no way the same number of wells could be drilled under each alternative.	See Chapter 4, Fish, Aquatic and Wildlife Habitat, Including Special Status Species section for modifications to the impact analyses.
DR-MTDK-MC-13-0121-23	Oil and gas well pad densities are cited in Chapters 3 and 4 as having an effect on sage-grouse and sage-grouse habitat. What are the well-pad densities assumed for the alternatives?	See Chapter 4, Fish, Aquatic and Wildlife Habitat, Including Special Status Species section and the Minerals Appendix, Fluid Minerals, Reasonably Foreseeable Development Scenario for Resource Management Plan Alternatives section for revisions to the RFD and impact analyses.
DR-MTDK-MC-13-0121-34	While grazing has the potential to affect sage-grouse habitat, the Draft RMP fails to describe how sage grouse habitat and displacement of sage-grouse have been affected by grazing practices in the MCFO planning area. What studies have been done to distinguish between impacts to sage-grouse and habitat from grazing as compared to energy development? What is the range condition of sage-grouse habitats within the MCFO planning area?	See Chapter 4, Fish, Aquatic and Wildlife Habitat, Including Special Status Species, Alternative E for potential effects to Greater Sage-grouse habitat from livestock grazing. Studies considered are found in Chapter 3, Fish, Aquatic and Wildlife Habitat, Including Special Status Species; Special Status Species - Avian; Greater Sage-grouse section. See Chapter 3, Livestock Grazing, Rangeland Health section for rangeland condition summaries and descriptions. Range conditions (including Greater Sage-grouse habitat) across 98% of the Miles City Field Office currently meet all five Rangeland Health Standards.
DR-MTDK-MC-13-0121-47	Page 4-135 " Male lek attendance would be expected to be reduced when subjected to the current standard noise limitation of 50 decibels at the lek site. What is the source of this information?	See Chapter 4, Fish, Aquatic and Wildlife Habitat, Including Special Status Species section for modifications.
DR-MTDK-MC-13-0121-53	Page 4-165. If it is assumed that male lek attendance is an index of population status, then the logic would be that a small lek would equate to a small population and a large lek would equate to a large population, as a direct proportion. If this is not the case, what is the relationship between numbers of males on a lek and population status? Why would large leks be a better	See Chapter 4, Fish, Aquatic and Wildlife Habitat, Including Special Status Species section. Large leks (more than 25 males) are needed to keep Greater Sage-grouse on the landscape (see Taylor et al. 2010) and, continue to be the best indicator of population status.

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	indicator of population status than small leks?	
DR-MTDK-MC-13-0121-54	On what is the conjecture based that 8 or more well pads per section and some undefined level of additional development would result in the complete loss of sage-grouse?	See Chapter 4, Fish, Aquatic and Wildlife Habitat, Including Special Status Species section and the Minerals Appendix, Fluid Minerals, Reasonably Foreseeable Development Scenarios for Resource Management Plan Alternatives section for revisions to the RFD and impact analyses.
DR-MTDK-MC-13-0142-23	Page 4-165. If it is assumed that male lek attendance is an index of population status, then the logic would be that a small lek would equate to a small population and a large lek would equate to a large population, as a direct proportion. If this is not implied in the above statement on pg. 4-165, what is the relationship between numbers of males on a lek and population status?	See Chapter 4, Fish, Aquatic and Wildlife Habitat, Including Special Status Species section. Large leks (more than 25 males) are needed to keep Greater Sage-grouse on the landscape (see Taylor et al. 2010) and, continue to be the best indicator of population status.
DR-MTDK-MC-13-0196-6	It is also unclear how the totals for sage-grouse priority habitat areas and general habitat areas under Alternative E in Table 2-1 equate to the totals in Table 4-88 (pg. 4-273) and Table 4-90 (4-274) (e.g., 830,000 surface acres priority habitat, 1,600,000 surface acres general habitat).	See Chapter 4, Fish, Aquatic and Wildlife Habitat, Including Special Status Species section for revisions.
DR-MTDK-MC-13-0169-17	The drastic and alarming decline in the natural habitat and numbers of greater sage-grouse (along with other game species such as pronghorn, sharp-tailed grouse, mule deer and non-game species like plover, Sprague's pipit, badger, jack rabbit, prairie dogs, and ferrets), in particular, requires special attention. BLM must take a hard look at how the proposed action directly (and, as discussed below, indirectly and cumulatively) impacts these important natural resources. Oil and gas development and ever increasing motorized access and use of public lands has resulted in the overall loss and degradation that is putting sage grouse and other species in peril. The impacts, therefore, must be carefully analyzed by BLM.	See Chapter 4, Fish, Aquatic, and Wildlife Habitat, Including Special Status Species section for effects from BLM's proposed actions on wildlife habitat. The requisite level of information necessary to make a reasoned choice among the alternatives in an EIS is based on the scope and nature of the proposed decisions. As the PRMP/FEIS analyzes land use planning-level decisions, which by their nature are broad in scope, the requisite level of data and information is more generalized in order to apply a wide-ranging landscape perspective. Although the BLM realizes that more data and more site-specific data could always be gathered, the baseline data used in the PRMP/FEIS provides the necessary basis to make informed land use plan-level decisions.
DR-MTDK-MC-13-0105-11	The Keystone XL pipeline should be discussed.	See Chapter 4, Lands and Realty, Assumptions and Methodology for all Alternatives section. The Keystone Pipeline is accounted for in Chapter 4 assumptions as one of the major pipelines assumed in the short term.
DR-MTDK-MC-13-0169-23	First, BLM never analyzes the direct, indirect, and cumulative impacts of this approach on the various resources in the analysis area, including but not limited to lands with wilderness characteristics, ACECs, WSAs, native wildlife (including but not limited to, big game habitat and sage grouse habitat), soils, cultural and historic properties, water resources. Important security areas for big game species, for instance, will continue to be carved up under BLM's	See Chapter 4, Lands with Wilderness Characteristics section for anticipated effects from BLM's proposed actions.  Travel Management Planning, which includes road and trail numbers, inventory and analysis, will be conducted during implementation planning. Following completion of the RMP, a

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	<p>hands off approach.</p> <p>Second, no effort is made to inventory, document, and map the existing • system of routes in the analysis area. As such, it is impossible for BLM to analyze the impacts of such routes (and for the public to comment on the impacts of such routes) in the absence of an comprehensive inventory documenting and mapping all existing routes in the analysis area. And, the baseline condition will continue to change and get worse before a future travel plan is adopted. Third, as per Tri-State, no new user-created routes were to be created in the analysis area motorized use was to be restricted to existing routes that existed in 2003 (when the ROD was signed), subject to a few exceptions. BLM, however, has taken no steps to document the existing system of routes that existed in 2003. Nor is BLM attempting to do so now. What is preventing members of the public from creating new existing routes in the analysis area prior to adoption of the RMP and any future travel plan? And, how will BLM even know such routes are new given that lack of a comprehensive inventory? Indeed, in the Draft RMP/EIS, BLM concedes that the number of existing routes may change prior to completing a travel plan for the region. This is a violation of NEPA, Tri-State, E.O. 11644, and 43 C.F.R. § 8342.</p> <p>Fourth, the draft RMP does authorize OHV use areas, including SRMAs as open to motorized vehicle use. But there is no evidence in the Draft RMP/EIS that BLM considered and applied the minimization criteria (outlined above) when making this decision. This is a violation of E.O. 11644 and BLM's implementing regulations. Fifth, BLM should designate a system of routes (roads and trail) and not leave it up to whatever may be perceived as an existing route. As mentioned above, these routes should be depicted on a map and undergo a NEPA and minimization criteria analysis. BLM should also determine where lands fall on the Recreational Opportunities Spectrum (ROS). Managing an area as semi-primitive or even semi-primitive motorized, might help when lay the ground work for future travel planning.</p> <p>Finally, BLM should not postpone completing a travel plan for the analysis area. In fact, BLM should have included travel planning for the entire analysis area in the Draft RMP/EIS because, in effect, it is designating a system of routes open to motorized use (just without any details about what the system is or end date). In the absence of any travel planning, the BLM should, at a minimum, limit motorize travel to designated routes in areas where a wilderness inventory has been conducted. Through the 2011 wilderness</p>	<p>transportation plan will be developed with the public that establishes a comprehensive designated route system for all areas where the RMP Record of Decision has determined OHV use is limited to designated routes.</p>

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	inventory process, BLM has already identified existing routes and no new vehicle routes should be created before the travel planning process begins, which probably will not be completed for many years.	
DR-MTDK-MC-13-0146-13	Pg. 2-75, Action 7. Communities lost 2000 AUMs from Alternative A to Alternative E. These losses should be more completely explained.	See Chapter 4, Livestock Grazing section for a description of effects from decreased AUMs.
	The BLM has underestimated values used for number of wells, pace of development and surface disturbance per well based on what we have observed in the development of similar energy developments throughout the region and in the Bakken development in western ND/eastern MT.	See Chapter 4, Minerals, Oil and Gas, Assumptions and Methodology section and the Minerals Appendix, Fluid Minerals, Reasonably Foreseeable Development Scenarios for Resource Management Plan Alternatives section. The 2008 and 2013 USGS resource estimates have been taken into consideration in the assumptions and RFD.
DR-MTDK-MC-13-0097-10	Draft RMP at pg. 2-81 - include the following as a new "Management Action" for Oil, Gas, and Geothermal in the Proposed RMP: Existing oil and gas or other mineral rights will be honored.	See Chapter 4, Minerals, Oil and Gas, Assumptions and Methodology section and the Minerals Appendix, Fluid Minerals, Operating Standards and Approval Procedures section for revisions. Also, see several sections in the front of Chapter 2, for example, under the directions "How To Read Table 2-5" for discussion on valid existing rights.
DR-MTDK-MC-13-0097-12	The Draft EIS fails to adequately identify the effect of proposed management prescriptions upon oil, gas, and EOR operations on existing leases. The EIS should discuss the impact of proposed management direction on development of those existing leases for each resource discussed in Chapter 4 of the EIS (air, soil, water, vegetation etc.)	See Chapter 4, Minerals, Oil and Gas, Assumptions and Methodology section and the Minerals Appendix, Fluid Minerals, Operating Standards and Approval Procedures section for revisions.
DR-MTDK-MC-13-0097-31	The BLM's authority to regulate, condition, or limit surface disturbing activities on existing leases is limited. A federal oil and gas lease is a real property right. See, e.g., <i>Winkler v. Andrus</i> , 614 F.2d 707, 712 (10th Cir. 1980); <i>Union Oil Co. v. Morton</i> , 512 F.2d 743, 747 (9th Cir. 1975). A company has a legal right to occupy the surface to explore for, produce, and develop its leases. <i>Pennaco Energy v. U.S. Department of the Interior</i> , 377 F.3d 1147, 1160 (10th Cir. 2004); 43 C.F.R. § 3101.1-2. Where land is leased without a No Surface Occupancy Stipulation, the Department cannot deny the permit to drill; it can only impose 'reasonable' conditions .... " <i>Sierra Club v. Peterson</i> , 717 F.2d 1409, 1411 (D.C. Cir. 1983). Examples of "reasonable" conditions the BLM may impose include those that "do not: require relocation of proposed operations by more than 200 meters; require that operations be sited off the leasehold; or prohibit new surface disturbing operations for a period in excess of 60 days in any lease year." 43 C.F.R. § 3101.1-2.	See Chapter 4, Minerals, Oil and Gas, Assumptions and Methodology section and the Minerals Appendix, Fluid Minerals, Operating Standards and Approval Procedures section for revisions.

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DR-MTDK-MC-13-0097-4	The Draft RMP states that "Upon plan approval (ROD), valid existing rights would not be changed by the decisions in this document until a permit or lease expired; following this, the area would be subject to the decisions reached in this document." Draft EIS at pg. 2-12. This statement is confusing and inaccurate because development on existing leases, like all future activities, will be "subject to" the decisions reached in the RMP. See 43 U.S.C. § 1732(a); see also 43 C.F.R. §1610.5-3(a) ("All future resource management authorizations and actions ... and subsequent more detailed or specific planning, shall conform to the approved plan.")	See Chapter 4, Minerals, Oil and Gas, Assumptions and Methodology section and the Minerals Appendix, and several sections in the front of Chapter 2, for example, under the directions "How To Read Table 2-5" for discussion on valid existing rights.
DR-MTDK-MC-13-0097-8	Draft RMP at pg. 4-263: delete the sentence stating "Post lease actions or authorizations (e.g. APDs or road or pipeline ROWs) would potentially be encumbered by timing and CSU stipulations for oil, gas, and geothermal leasing and development on a case-by-case basis and as required through project-specific NEPA analysis or other environmental review."	See Chapter 4, Minerals, Oil and Gas, Assumptions and Methodology section discussing BLM's authority on post-lease actions/authorizations.
DR-MTDK-MC-13-0104-3	Chapter 4, pg. 263, states that between 867- 1432 wells could be drilled on BLM minerals under Alternative A; while, on pg. 275 under the Cumulative Effects discussion it is indicated that between 796 and 1,762 wells could be drilled on BLM minerals. The discussion of Alternative E (Preferred), however, states on pg. 4-273 that between 4,262 and 6,972 wells could be drilled on all ownership, which considerably exceeds the Reasonable Foreseeable Development (RFD). The same figures are used under the Cumulative Effects section. Another example of these inconsistencies is the number of acres available for leasing. Under the preferred alternative, 1.2 million acres would allow No Surface Occupancy (NSO) restrictions, but then in the RFD section it says 1.5 million acres will be NSO.	See Chapter 4, Minerals, Oil and Gas, Assumptions and Methodology section for revisions.
DR-MTDK-MC-13-0121-2	It is projected that nearly 6 million barrels of oil (approximately 1.4 million barrels of BLM minerals) and nearly 6 trillion cubic feet of natural gas (approximately 1.3 trillion cubic feet of BLM minerals) could be produced. We question whether these figures have been updated to comport with recently revised resource estimates issued by the US Geological Survey.	See Chapter 4, Minerals, Oil and Gas, Assumptions and Methodology section and the Minerals Appendix, Fluid Minerals, Reasonably Foreseeable Development Scenarios for Resource Management Plan Alternatives section. The 2008 and 2013 USGS resource estimates have been taken into consideration in the assumptions and Reasonable Foreseeable Development Scenario of the MCFO RMP.
DR-MTDK-MC-13-0121-4	BLM does not have the authority to impose new stipulations on leases after they have been issued. Nor does BLM have authority to impose mitigation measures, such as Conditions of Approval (COA), that exceed the terms and conditions of previously issued leases.	See Chapter 4, Minerals, Oil and Gas, Assumptions and Methodology section and the Minerals Appendix, Fluid Minerals, Operating Standards and Approval Procedures section for revisions.
DR-MTDK-	Are all proposed surface management restrictions applied equally regardless of whether the BLM Administered Lands in question are Surface or Federal	See Chapter 4, Minerals, Oil and Gas, Assumptions and Methodology section and the Minerals Appendix, Fluid

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MC-13-0121-58	Mineral Estate and/or Oil and Gas Lease?	Minerals, Operating Standards and Approval Procedures section. Proposed leasing actions found in the RMP, upon approval, will apply to private surface overlying federal oil and gas mineral acres (split-estate lands) in accordance with federal laws and regulations.
DR-MTDK-MC-13-0162-8	BLM has underestimated values used for number or wells, pace of development and surface disturbance per well based on what we have observed in the development of similar energy developments throughout the region and in the Bakken development in western North Dakota/eastern MT.	See Chapter 4, Minerals, Oil and Gas, Assumptions and Methodology section and the Minerals Appendix, Fluid Minerals, Reasonably Foreseeable Development Scenarios for Resource Management Plan Alternatives section. The 2008 and 2013 USGS resource estimates have been taken into consideration in the Fluid Minerals Chapter 4 Assumptions and Methodology and Reasonable Foreseeable Development Scenario of the MCFO RMP.
DR-MTDK-MC-13-0117-34	The BLM has not considered how its transportation plan will negatively impact hunting.	See Chapter 4, Recreation, Cumulative Impacts section for effects to hunting from BLM's proposed actions. Following completion of the RMP, a transportation plan will be developed with public input that establishes a comprehensive designated route system for all areas where the RMP Record of Decision has determined OHV use is limited to existing roads and trails.
DR-MTDK-MC-13-0176-3	Cumulative Impacts pg. 4-317. The sixth paragraph is an inaccurate statement " ... FWP leases rights for hunting access ... " FWP doesn't lease rights but enters into a contractual agreement to allow public hunting access.	See Chapter 4, Recreation, for corrected text.
DR-MTDK-MC-13-0089-33	Authorizing 5.4 million acres in the Miles City RMP to oil and gas development and its ensuing infrastructure - which includes the construction of well pads, evaporation ponds, roads, power lines, and pipelines - clearly will represent a dramatic and community altering change to the physical environment. The impacts that this development will have on the traditional rural, ranching communities must be sufficiently identified in the RMP.	See Chapter 4, Social and Economic section for revisions.
DR-MTDK-MC-13-0090-16	On pg. 4-403, under Environmental Justice, the Draft RMP makes the following statement: "No alternative considered would result in any identifiable disproportionate impacts specific to any minority or low-income population or community." The Draft RMP on pg. 4-402 states: .... very small towns highly dependent upon agriculture .... " It is clear you acknowledge there are small towns dependent on agriculture of which are of low income and struggle to survive but you discount their importance and state there would be no impact to these low income families and communities. Please take a hard look at these two statements in the Draft RMP and consider the fact that you are imposing	See Chapter 4, Social and Economic section for revisions. The requisite level of information necessary to make a reasoned choice among the alternatives in an EIS is based on the scope and nature of the proposed decisions. As the PRMP/FEIS analyzes land use planning-level decisions, which by their nature are broad in scope, the requisite level of data and information is more generalized in order to apply a wide-ranging landscape perspective. Although the BLM realizes that more data and more site-specific data could always be gathered, the baseline data

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	environmental injustice to these very small communities.	used in the PRMP/FEIS provides the necessary basis to make informed land use plan-level decisions.
DR-MTDK-MC-13-0090-17	The Implan system uses data and information from major urban areas and no information from small communities are gathered or included. Clearly the statement in the Draft RMP that "very small towns dependent on agriculture" shows your agency acknowledges the negative impact your decision will have on their communities but through the Implan system this information and fact is lost. Take a hard look at these two statements and do further analysis on the impacts your decision will have as this directly relates to the environmental justice of the decision.	See Chapter 4, Social and Economic section for revisions. The requisite level of information necessary to make a reasoned choice among the alternatives in an EIS is based on the scope and nature of the proposed decisions. As the PRMP/FEIS analyzes land use planning-level decisions, which by their nature are broad in scope, the requisite level of data and information is more generalized in order to apply a wide-ranging landscape perspective. Although the BLM realizes that more data and more site-specific data could always be gathered, the baseline data used in the PRMP/FEIS provides the necessary basis to make informed land use plan-level decisions.
DR-MTDK-MC-13-0090-3	The Draft RMP reports the following statement on pg. 4-398. "No alternative would affect the major social trends or social organizations in the local communities of the planning area". How are you able to make this statement when the majority of local citizens commenting on this plan have explained the large negative impact of closing large areas of BLM managed land to recreation, agriculture and resource development?	See Chapter 4, Social and Economic section for revisions.
DR-MTDK-MC-13-0108-13	In Economics, the Draft RMP states Federal coal production would remain near current levels to support continued operation of the four existing mines in the planning area. The annual amount of federal coal produced (25,288,000 short tons per year) and the royalties from this production (\$41,504,000) would remain the same under all the alternatives. Id. at 4-406. Because additional federal coal development in excess of current levels is likely, especially given the findings of the Powder River Basin Report, the analysis of economic and other impacts should acknowledge the likelihood of increased production royalties.	See Chapter 4, Social and Economic section for revisions.
DR-MTDK-MC-13-0117-4	The relevant information or impacts that the BLM failed to consider include but are not limited to: the historical and current information detailing the cultural heritage of ranching in the impacted area; the impacts of layers and layers of regulation (Wild and Scenic River designation, Wilderness Study Area designation, the neighboring CM Russell Wildlife Refuge designation, and so on) that already exist and which all negatively affect the historic, cultural, economic, and social environment attached to the area. The Draft RMP limits all pipelines, phone lines, cell towers, electrical lines, and the like; but, there is no analysis of these limitations and their impact on local communities and economies. Furthermore, this exclusion forces all such linear	See Chapter 4, Social and Economic section for revisions.

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	projects on to private land without an adequate cumulative impacts analysis.	
DR-MTDK-MC-13-0117-6	The Draft RMP does not provide any sort of comparison of the economic costs among the alternatives with regard to the impacts on grazing. The economic analysis shows economic impacts from natural gas exploration and development. However, the BLM still has not provided any analysis quantifying the potential impacts to ranching.	See Chapter 4, Social and Economic section for revisions.
DR-MTDK-MC-13-0166-3	How are you addressing erionite and the potential human health risks that may be associated with exposure. Erionite is present in Carter County, Montana on both BLM as well as National Forest System lands.	See Chapter 4, Social and Economic section for revisions.
DR-MTDK-MC-13-0090-4	The Draft RMP refers to a study done by Rasker, Alexander, Van den Noort, and Carter 2004 which attempts to display the benefits and need for open space. The study is not definitive and was done in response to increased subdivision activity in high density areas of western Montana. Your Draft RMP makes this statement: "However, they may be concerned that some development would be pushed onto private land in areas which resource protections would be less stringent". Please provide a reference for the quotation.	See Chapter 4, Social and Economic, Economics section for revisions.
	A full economic analysis should be conducted and the economic impacts (\$) by Alternative should be clearly outlined.	See Chapter 4, Social and Economic, Economics section, Alternatives A through E, for impacts assessed from BLM's proposed management actions in Chapter 2.
DR-MTDK-MC-13-0158-4	Evaluate and disclose the potential economic benefits of employing the Carter MLP.	See Chapter 4, Social and Economic, Economics section, for economic effects from BLM's proposed actions.
DR-MTDK-MC-13-0158-5	The BLM should develop and include in the Proposed RMP a discussion of the potential economic benefits of designating the Carter MLP.	See Chapter 4, Social and Economic, Economics section, for economic effects from BLM's proposed actions. Also, see Chapter 2, Minerals, Oil & Gas, Proposed Carter MLP section for revisions in the alternatives.
DR-MTDK-MC-13-0090-7	The recreation analysis is lacking in accuracy as the spending of users is not accurate. On pg. 4-409 of the Draft RMP it states that "for every 1000 visitor days, there would be a corresponding change of .15 jobs and 3,804 in labor income." Further statements include impact from non local-overnight and local overnight jobs and income. We know by the visitor use survey conducted by the Forest Service that spending per visitor user day is much higher than the \$3.80 value included in your Draft RMP and the overnight value of \$14.06 you used. The numbers used by the Forest Service are more than \$100 per local visitor day and \$300 per non-local visitor day. These numbers were from	See Chapter 4, Social and Economic, Economics section, for updated recreation visitor expenditure profiles.

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	several years ago when fuel prices were less than a third of what they are today. Adjusted for inflation the cost per user day has risen substantially. I request you take a hard look at your user day expenditures included in your Draft RMP and adjust them to better reflect the true economic impact of recreation in your Draft RMP and present a true reflection of recreational spending to the public.	
DR-MTDK-MC-13-0161-3	Your EIS does not even touch on the possible negative economic consequences that future BLM management will be responsible for under this alternative.	See Chapter 4, Social and Economic, Economics section, which describes changes in employment, income, in various private sectors and changes to social conditions.
DR-MTDK-MC-13-0094-4	There are 4 economic multipliers in a local economy: They are: (1) Output, (2) Employment, (3) Income and (4) Value Added. Have you done any economic analysis on how each of the multipliers is affected?	See Chapter 4, Social and Economic, Economics section. Multipliers are used to assess employment and income effects on the local economy. A description of these multipliers has been added , along with detail on the impact area and modeling tool used to generate these multipliers.
DR-MTDK-MC-13-0103-4	You have not address the commutative and County economic impact this plan will have to the people of Montana. You have not addressed impacts to schools, gas stations, hotels and eating, sporting good and equipment like ATVS and SUVs, housing market, the growth in the area, and tax revenues that would be losses that would have been generated from the proposed changes.	See Chapter 4, Social and Economic, Economics section. Multipliers are used to assess employment and income effects on the local economy. A description of these multipliers has been added, along with detail on the impact area and modeling tool used to generate these multipliers.
DR-MTDK-MC-13-0192-1	The BLM contemplates removing 2000 AUMs from areas within the RMP. The document hardly addresses the impact to these ranchers and the local economy.	See Chapter 4, Social and Economic, Economics section. The analysis of grazing related economic effects has been updated on the importance of public land grazing. Also, see changes to livestock grazing alternatives in Chapter 2.
DR-MTDK-MC-13-0192-2	The document mentions that service industries are the number one economic driver in the area. What it fails to address is that the majority of those industries rely on the agricultural industry to stay in business.	See Chapter 4, Social and Economic, Economics section. The analysis of grazing related economic effects has been updated on the importance of public land grazing.
DR-MTDK-MC-13-0030-4	Chapter 4, Table 4-141, pg. 4-407, 1 head month (cattle and horses) = .78 AUMs is in conflict with the definition of an AUM everywhere else in the Resource Management Plan.	See Chapter 4, Social and Economic, Economics, Cumulative Impacts section. The conflict has been removed.
DR-MTDK-MC-13-0089-26	As BLM proceeds with the Miles City RMP and evaluates public land management throughout the MCFO, including the possibility of opening federal lands to oil and gas development and hydraulic fracturing, it must consider the human health impacts associated with these extractive practices.	See Chapter 4, Social and Economic, Social Conditions section for a discussion on effects anticipated from BLM's proposed actions.
DR-MTDK-MC-13-	Erodible soils represent a significant source of pollutants in the planning area. For this reason, we recommend the Proposed RMP include a map depicting areas of steep slopes and fragile or erodible soils and proximity to surface	See Chapter 4, Soils section for the impacts from surface-disturbing activities on soils. A map is not included due to the small size of individual areas not being discernable at the scale

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0102-17	waters. Depending on a host of variables including soil characteristics, industrial operations and topography, associated runoff could introduce sediments as well as salts, selenium, heavy metals and other pollutants into surface waters. To fully disclose and, if necessary, mitigate the potential impacts of soil disturbance, we recommend that the Proposed RMP include an estimate of erosion rates, by alternative, in areas where fragile or erodible soils are present.	of the planning area. Erosion rates are not provided as they are site-specific; they vary by location.
DR-MTDK-MC-13-0135-5	"Concentrated use for big game retrieval" seems to be a contradiction of terms since one time retrieval would not equate to "concentrated use."	See Chapter 4, Soils section. Often, when one set of vehicle tracks are created, subsequent use occurs, resulting in compaction and erosion.
DR-MTDK-MC-13-0131-2	We have excess silt coming down on the hay fields from open OHV use.	See Chapter 4, Soils section. OHV use could result in an increase in siltation. Also, as described in Chapter 2, certain OHV areas previously designated "open" would no longer be "open" under the PRMP/FEIS.
DR-MTDK-MC-13-0176-4	Consider the cumulative effects of the Tongue River Railroad on recreational access to public lands.	See Chapter 4, Types of Impacts, Cumulative Impacts section for actions considered in cumulative effects assessed.
DR-MTDK-MC-13-0126-10	Chapter 4, pg. 92, Cumulative Impacts: this section talks about soils, not vegetation, but it is under the vegetation section.	See Chapter 4, Vegetation section for edits to address vegetation.
DR-MTDK-MC-13-0126-16	Chapter 4, pg. 106, There is no evidence that harvesting cottonwoods would "maintain or improve the integrity and functionality of riparian and wetland areas by maintaining cottonwood health." Cottonwoods establish on bare, mineral soil created by flooding. Harvesting has no effect on this process. Harvesting cottonwood would simply reduce the number of trees present, thereby reducing wildlife habitat and perhaps allowing tamarisk and Russian olive to invade.	See Chapter 4, Vegetation section, Alternative E for text changes.
DR-MTDK-MC-13-0126-9	Chapter 4, pg. 86, Assumptions and Methodology. Many people in BLM are working to increase the amount of sagebrush on public lands to protect sage grouse, but this section states that sagebrush will not be restored but rather will be treated with herbicide. This needs further clarification.	See Chapter 4, Vegetation, Assumptions and Methodology section for text changes. The example creating the confusion in Chapter 4 has been removed.
DR-MTDK-MC-13-0089-59	New research shows that chemically concentrated fracking fluids can migrate into groundwater aquifers within a matter of years. A second round of testing in the Pavillion, Wyoming area was recently performed by the U.S. Geological Survey, which supported EPA's preliminary findings that hydraulic fracturing	See Chapter 4, Water Resources for text changes describing impacts from hydraulic fracturing. Also, see changes to Chapter 3, Fluid Minerals section and the Minerals Appendix, Fluid Minerals, Operating Standards and Approval Procedures,

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	resulted in groundwater contamination.	Completion Operations section.
DR-MTDK-MC-13-0089-60	The New York Times recently uncovered a 1987 U.S. Environmental Protection Agency (EPA) report to Congress which found, among other things, that fracking can cause groundwater contamination, and cites as an example a case where hydraulic fracturing fluids contaminated a water well in West Virginia. The EPA report was further summarized and reviewed in an Environmental Working Group report.	See Chapter 4, Water Resources for text changes describing impacts from hydraulic fracturing. Also, see changes to Chapter 3, Fluid Minerals section and the Minerals Appendix, Fluid Minerals, Operating Standards and Approval Procedures, Completion Operations section.
DR-MTDK-MC-13-0134-3	The filter socks that have been straining frack water have been exceeding federal radioactivity limits. This is an entirely new threat to our water system and, since the Montana Bakken stems from the same formation, it is a likely threat in Montana as well as North Dakota. The RMP must take these new developments into consideration. One resource could be the draft EPA Study of the Potential Impacts of Hydraulic Fracturing on Drinking Water Resources. This study is scheduled to be completed in 2014 and should be addressed in the RMP.	See Chapter 4, Water Resources for text changes describing impacts from hydraulic fracturing. Also, See Chapter 3, Minerals, Leasable Minerals, Oil and Gas; and the Minerals Appendix, Fluid Minerals, Operating Standards and Approval Procedures, Completion Operations section for modifications. Draft documents are considered in planning but their draft decisions are not incorporated as they are subject to change.
DR-MTDK-MC-13-0146-9	Pg. 4-81, Paragraph 6 begins with Livestock grazing on 16 million acres. Where did the 16 million acres come from? I thought the BLM had between 2.7 million to 3.6 million acres.	See Chapter 4, Water Resources, Alternative E for text changes.
DR-MTDK-MC-13-0135-6	There is no evidence or information to demonstrate that the relatively slight, ephemeral compaction of soil from one time motorized big game retrieval (MBGR) reduces water quality or accelerates erosion. It is difficult to imagine that a onetime crossing of a drainage by an OHV has ever resulted in reduced water quality.	See Chapter 4, Water Resources, Alternatives C and D for text changes. See also, Chapter 4, Soils section. Often, when one set of vehicle tracks are created, subsequent use occurs, resulting in compaction and erosion.
DR-MTDK-MC-13-0089-28	BLM must address the direct, indirect, and cumulative impacts to groundwater, 40 C.F.R. § 1508.25(c), giving particular scrutiny to the potential for contamination of groundwater supplies.	See Chapter 4, Water Resources, for the direct, indirect, and cumulative impacts to groundwater from various actions.
DR-MTDK-MC-13-0089-32	BLM must closely assess the direct, indirect, and cumulative impacts of lease development on water supplies. 40 C.F.R. § 1508.7, 1508.8. This analysis must consider the potential sources of water in the MCFO that would be used for oil and gas development, and the impacts of these water withdrawals on water availability for drinking, agriculture, and wildlife. The analysis must further address the impacts to water quantity at different annual, seasonal, monthly, and daily time scales because the impacts of such water withdrawals could be more acute during times, months, and seasons of scarcity.	See Chapter 4, Water Resources, Impacts Common to all Alternatives; and Chapter 4, Fish, Aquatics and Wildlife Habitat, Impacts Common to all Alternatives sections for text changes. Sufficient data do not exist to quantify the impacts of water withdrawals to water quantity at annual, seasonal, monthly, and daily time scales.
DR-MTDK-	The Proposed RMP should analyze the following: estimated water demand for the anticipated oil and gas development in the planning area; possible sources	See Chapter 4, Water Resources, Impacts Common to all Alternatives; Riparian and Wetland Areas, Impacts Common to

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MC-13-0102-33	of this water; and potential impacts of the water withdrawals (e.g., drawdown of aquifer water levels, reductions instream flow and associated water quality, and impacts on aquatic life, wetlands, and other aquatic resources).	all Alternatives; and Fish, Aquatic and Wildlife Habitat, Including Special Status Species, Aquatic, Impacts Common to all Alternatives sections for text changes. Sufficient data do not exist to quantify estimated water demand.
DR-MTDK-MC-13-0104-31	On pg. 4-55, the document reads "Left untreated, produced water discharge and infiltration or leaking produced water disposal pits would be likely to reach stream channels via subsurface flow, which would decrease water quality." Pg. 4-56 reads "Produced water spilled or treated in infiltration, unlined, or leaking evaporations impoundments (water disposal pits) would impact shallow groundwater aquifers and contain the potential to reach and contaminate surface water through groundwater interface." A Montana Pollution Discharge Elimination System (MPDES) permit is required in order to discharge to surface water in Montana. All discharged water must comply with the limits set by DEQ to determine water degradation will not occur.	See Chapter 4, Water Resources, Impacts Common to all Alternatives section for text changes.
DR-MTDK-MC-13-0108-22	While the analysis and identified mitigation measures may be appropriate for some types of oil and gas exploratory and/or production drilling, they are not appropriate in the context of coal exploratory drilling. The RMP should explicitly note that, for shallow exploration, air drilling is often used, and drill cuttings are not contained in pits. This reduces the need for construction of drill pads, thus reducing surface disturbance. For deeper exploration holes, reserve pits generally contain bentonite-based muds; the reserve pit is backfilled and reclaimed at the end of the drilling.	See Chapter 4, Water Resources, Impacts Common to all Alternatives section for the impacts from coal exploration activities to water resources. For situations where coal exploration activities use reserve pits to contain cuttings and drilling fluids, the impacts would be a combination of those discussed for surface-disturbing activities "including...mineral and energy exploration" and those discussed for the use of reserve pits. For situations where reserve pits are not used, the impacts would be limited to those discussed for surface-disturbing activities. The impact analysis in Chapter 4, Water Resources, Impacts Common to all Alternatives, states that the use of pitless or closed-loop technology would potentially conserve water and reduce surface disturbance. It is implied that this may not be true in every case. The use of pitless or closed-loop technology would be prescribed on a case-by-case basis as identified in the NEPA process.
DR-MTDK-MC-13-0121-15	The evidence in Wyoming conflicts with the statement that 1) Infiltration from water disposal pits would be likely to reach stream channels and 2) would impact shallow groundwater. Between August 2004 and December 2009, approximately 2,013 impoundments with nearly 2,300 associated monitoring wells or borings were evaluated for potential groundwater impacts. Of these, only 273 impoundments required permits and monitoring. In 2010, 170 of these wells were studied in three hydrologic settings, 72% exhibited stable groundwater chemistry (no change), 12% show TDS and sulfate concentrations	See Chapter 4, Water Resources, Impacts Common to all Alternatives section for text changes.

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	on an upward trend, 6% have flushed (increase with a decrease back to normal over time), and 6% exhibit an improvement in water quality. (Steinhorst 2010).	
DR-MTDK-MC-13-0142-15	Pg. 4-62. Referring to the paragraph that starts “Although all methods would cause surface disturbance, the magnitude and duration of the impacts of surface-disturbing activities...” The conclusions of this paragraph describe a "worst case" situation not necessarily applicable to stream channel crossing or activity within wetlands. It is recommended that a reference to the Army Corps of Engineers (ACE) regulatory program under Section of 404 of the Clean Water Act be referenced and a proper perspective of these impacts be provided in the Proposed RMP which are reduced under these regulatory programs. Additionally, this section fails to acknowledge the benefits and increased frequency of using horizontal drilling technologies to bore under wetlands and/or other water bodies that may be encountered during a pipeline project.	See Chapter 4, Water Resources, Impacts Common to all Alternatives for text changes and the potential impacts from horizontal directional drilling.
DR-MTDK-MC-13-0146-32	Whenever BLM monitoring identifies that livestock grazing is not meeting Rangeland Health Standards and Guidelines or that riparian ecosystems are rated nonfunctioning or functioning at risk, BLM makes changes to the grazing management to rectify the problem. Therefore, livestock grazing managed by BLM CANNOT "alter the watershed hydrology by lowering the water table; compacting soils; decreasing low flows and infiltration rates; and increasing overland flow, volume of peak flows, and floodwater velocity".	See Chapter 4, Water Resources, Impacts Common to all Alternatives section for text changes.
DR-MTDK-MC-13-0126-8	Chapter 4, pg. 50, Management common to all alternatives, There is no mention of stock ponds. How would the construction of new stock ponds affect the downstream environment? How would the decommissioning of stock ponds affect the downstream environment?	See Chapter 4, Water Resources. The impacts from surface water impoundments are discussed under the Impacts Common to all Alternatives section.
DR-MTDK-MC-13-0076-2	Two recent studies have used radio-telemetry to assess impacts of energy infrastructure on sage-grouse. LeBeau (2012) investigated the impacts of wind facilities and an associated transmission line in Wyoming, and Nonne et al. (2013) released a final report of a 10-year study of a transmission line in Nevada. The Nonne study is currently the only long-term study conducted that specifically evaluates potential impacts of a power line on sage-grouse. The LeBeau study indicated that habitat quality is a significant influencer of sage-grouse occupancy, regardless of the presence of a transmission line. BLM needs to consider these studies, which use current telemetry techniques and specifically investigate sage-grouse responses to power lines, when addressing power lines in its RMP updates.	See Chapter 4; Fish, Aquatic and Wildlife Habitat, Including Special Status Species; Impacts Common to all Alternatives section for additional discussion.
DR-MTDK-MC-13-	The cumulative effects of land management within the MCFO planning area on sage grouse over Management Zone 1 area are not addressed under Cumulative Impacts.	See Chapter 4; Fish, Aquatic and Wildlife Habitat, Including Special Status Species; Cumulative Impacts sections for modifications. See Cumulative Impact Assessment: Miles City,

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0104-27		for Cumulative Impacts Analysis based on WAFWA Management Zone 1.
DR-MTDK-MC-13-0121-29	Page 3-74. Sage-grouse populations decline by 2 percent annually (Connelly, Knick, Schroeder, Stiver, WAFWA 2004). • Does this statement refer to populations throughout the range of the sage-grouse? Several statements in the Draft RMP and in reference literature appear to contradict that information. For instance, in the paragraph on pg. 3-74, in reference to Montana specifically, the text indicates: The total number of males in these trend areas peaked in 2006 with 988 males. The number of males counted on trend areas declined from 2007 to 2009 but increased in 2010. The overall trend for sage-grouse in trend areas is stable (Beyer et al 2010). • In addition, the following statement (attributed to Beyer et al [2010]) on pg. 4-162 also appears to conflict with the above information: Sage-grouse lek counts are used to monitor sage-grouse populations and trends and ideally are counted multiple times over the course of the breeding season. However, a lack of data outside of the PRB area of Montana and insufficient population data throughout the planning area has resulted in a lack of information about specific population trends. The Montana Sage Grouse Work Group (2005) also states, "Recent genetic analysis (Oyler-McCanceet al 2001) indicates that Montana sage-grouse are representative of a single population with good genetic diversity broad-scale assessment."	See Chapter 4; Fish, Aquatic and Wildlife Habitat, Including Special Status Species; Alternative E for modifications. Also, the "2 percent annually" is a range-wide percentage; the Montana count references are on trend leks within Region 7 which is within the planning area.
DR-MTDK-MC-13-0121-45	Page 4-135 " In some areas, such as the Cedar Creek Anticline, decreased male lek attendance has exceeded 80 percent, which is largely attributed to oil and gas development. What is the source for this information?"	See Chapter 4; Fish, Aquatic and Wildlife Habitat, Including Special Status Species; Alternative A. The sentence has been deleted.
DR-MTDK-MC-13-0126-11	Chapter 4, pg. 108, Cumulative impacts It should be mentioned that these crested wheatgrass fields are often near-monocultures that provide poor wildlife habitat.	See Chapter 4; Fish, Aquatic and Wildlife Habitat, Including Special Status Species; Cumulative Impacts sections for effects to Fish and Wildlife habitat from BLM's proposed actions.
DR-MTDK-MC-13-0142-22	Pgs. 4-163 to 167 - Cumulative Impact. The cumulative impact section summarizes the past effects of various land uses and other factors that have affected wildlife, including sage-grouse. This discussion appears to repeat much of the discussion in Chapter 3. Addressing predicted impacts to sage-grouse, relies heavily on research conducted in Management Zone 1. However, the cumulative effects of land management within the MCFO planning area on sage-grouse over this broader Management Zone 1 area are not addressed under Cumulative Impacts. At a minimum, the MCFO Draft RMP should address the potential cumulative effects of the proposed planning activities in the MCFO	See Chapter 4; Fish, Aquatic and Wildlife Habitat, Including Special Status Species; Cumulative Impacts sections for revisions. See Cumulative Impact Assessment: Miles City, for Cumulative Impacts Analysis based on WAFWA Management Zone 1.

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	planning area as they relate to the HiLine and Billings Pompey's Pillar planning areas.	
DR-MTDK-MC-13-0142-8	<p>Page 3-74. Sage-grouse populations decline by 2 percent annually (Connelly, Knick, Schroeder, Stiver, WAFWA 2004)." Does this statement refer to populations throughout the range of the sage-grouse or just within the MCFO? Several statements in the Draft RMP and in reference literature appear to contradict information presented above. For instance, in the paragraph on pg. 3-74, in reference to Montana specifically, the text indicates: "The total number of males in these trend areas peaked in 2006 with 988 males. The number of males counted on trend areas declined from 2007 to 2009 but increased in 2010. The overall trend for sage-grouse in trend areas is stable (Beyer et al 2010)." In addition, the following statement (attributed to Beyer et al [2010]) on pg. 4-162 also appears to conflict with the above information: "Sage-grouse lek counts are used to monitor sage-grouse populations and trends and ideally are counted multiple times over the course of the breeding season. However, a lack of data outside of the PRB area of Montana and insufficient population data throughout the planning area has resulted in a lack of information about specific population trends." The Montana Sage Grouse Work Group (2005) also states, "Recent genetic analysis (Oyler-McCance et al 2001) indicates that Montana sage-grouse are representative of a single population with good genetic diversity (broad-scale assessment)." Given the potential inconsistencies of the above statements, it is important to accurately depict the trend in population within the MCFO. Once this is accomplished, sources of the information should be clearly provided.</p>	<p>See Chapter 4; Fish, Aquatic and Wildlife Habitat, Including Special Status Species; Alternative E for modifications. Also, the "2 percent annually" is a range-wide percentage; the Montana count references are on trend leks within MFWP Region 7 which is within the planning area.</p>
DR-MTDK-MC-13-0190-9	<p>In your Chapter 4 discussion of piping plover and interior least tern habitat, you make the following statement: "Piping plovers and interior least terns are limited to the saline wetlands in northeastern Montana and graveled islands associated with the Yellowstone and Missouri rivers. The greatest impacts to both species are fluctuating water levels and recreational use of the graveled islands, occurrences over which the BLM has essentially no management control. As a result, they are minimally affected by BLM-authorized activities." The assertion that BLM has "essentially no management control" over fluctuating water levels within the MCFO RMP planning area is false. Numerous BLM-authorized activities have a profound effect on water level fluctuation.</p>	<p>See Chapter 4; Fish, Aquatic and Wildlife Habitat, Including Special Status Species; Cumulative Impacts sections for text changes.</p>
DR-MTDK-MC-13-	<p>According to NEPA and FLPMA, you were required to coordinate and cooperate with local governments that may be affected by your RMP. You were also required to coordinate and cooperate with all incorporated towns and</p>	<p>See Chapter 5, Consistency section for inconsistencies identified between the PRMP/FEIS and available county growth plans. During plan initiation, all of the counties in the planning area</p>

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0013-1	counties that may be affected by your RMP. There are over 200 recognized local governments not including cities, towns, and counties. I strongly suspect that you did not contact or make effort to coordinate and cooperate.	were invited to become Cooperating Agencies and help BLM prepare the Draft RMP/EIS.
DR-MTDK-MC-13-0016-1	NEPA requires cooperation and coordination with local land use and growth policies of recognized local governments (Counties, cities, towns, grazing districts, fire districts, school districts, weed districts, hospital districts, road districts, state governments, tribes, other federal agencies. It means any entity that has ability to collect tax dollars and spend them). NEPA requires efforts to make federal plans consistent with local plans so long as federal law allows and, if not able to, are required to publish reasons for failure in the Environmental Consequences of the Environmental Impact Statement. NEPA requires BLM to preserve history and heritage of use if at all possible. NEPA requires BLM to do analysis of the economic impacts of their proposed plan with all affected constituents and public entities; and when federal law allows, design plans are not to be negative to local economies.	See Chapter 5, Consistency section for inconsistencies identified between the PRMP/FEIS and available county growth plans. Available County Growth plans were considered in the preparation of the RMP.
DR-MTDK-MC-13-0022-1	There is nothing in Environmental Consequences addressing possible conflicts with local purposes, policies, approved plans, and programs. Where an inconsistency exists, the statement should describe the extent to which the agency's would reconcile its proposed action with the plan or law.	See Chapter 5, Consistency section for inconsistencies identified between the PRMP/FEIS and available county growth plans.
DR-MTDK-MC-13-0070-2	The legislature passed and the governor signed H B 169. This will become Law on October 1, 2013. H B 169 codifies in state law, Title 76, the use of a Growth Policy as the legal document a local county may use to coordinate with federal agencies on land planning action that affect their county. HB 169 makes the Growth Policy the legal document the county can use to coordinate. The BLM should contact all counties affected by these 3 RMPs and ask if they wish to coordinate.	See Chapter 5, Consistency section for inconsistencies identified between the PRMP/FEIS and available county growth plans.
DR-MTDK-MC-13-0085-2	Satisfaction of the following regulations is a requirement of NEPA. 43 CFR 1610.3-2 (BLM) Consistency requirements a) Guidance and resource management plans and amendments shall be consistent with officially approved or adopted resource related plans and policies and programs contained therein, of other Federal agencies, State and local governments and Indian tribes, so long as the guidance and resource management plans are also consistent with the purposes, policies and programs of Federal laws and regulations applicable to public lands.	See Chapter 5, Consistency section for inconsistencies identified between the PRMP/FEIS and available county growth plans.
DR-MTDK-MC-13-0085-4	40 CFR 1506.2 (CEQ) (d). To better integrate environmental impact statements into state and local planning processes, statements shall discuss any inconsistency of a proposed action with any approved state or local plan or laws (whether or not federally sanctioned). Where an inconsistency exists, the	See Chapter 5, Consistency section for inconsistencies identified between the PRMP/FEIS and available county growth plans.

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	statement should describe the extent to which the agency would reconcile its proposed action with the plan or law.	
DR-MTDK-MC-13-0117-20	The BLM Failed to Comply With Intergovernmental Cooperation Act. The Intergovernmental Cooperation Act ("ICA"), 31 U.S.C. § 6501-6506, and companion Executive Order 12372, require all federal agencies to consider local viewpoints during the planning stages of any federal project. 31 U.S.C. § 6506(c). The obligation of the BLM to consider local government concerns is a legally enforceable right. City of Waltham v. United States Postal Serv., 11 F.3d 235, 245 (1st Cir. 1993). Injunctive relief is available in those cases where the federal agencies have failed to comply with the ICA. City of Rochester v. United States Postal Serv., 541 F.2d 967, 976 (2nd Cir. 1976). The consideration of local government plans and policies must occur on the record. Federal agencies have an affirmative duty to develop a list of factors which support or explain an agency's decision to act in disharmony with local land use plans. Village of Palatine v. United States Postal Serv., 742 F. Supp. 1377, 1397 (N.D. Ill. 1990).	See Chapter 5, Consistency section for inconsistencies identified between the PRMP/FEIS and available county growth plans. All counties in the Planning Area were invited to become Cooperating Agencies and help BLM prepare the Draft RMP/EIS.
DR-MTDK-MC-13-0122-2	Land management documents like this must be consistent with local government resource plans. If they are inconsistent, the Draft RMP must disclose and discuss any inconsistencies with local plans and laws, and discuss how these inconsistencies will be reconciled. The Draft RMP must evaluate the environmental consequences resulting from its conflict with local resource plans. And perhaps most importantly for this document, the Draft RMP must evaluate and discuss the economic impact of its proposed action, and the impact of its inconsistency with local government resource plans.	See Chapter 5, Consistency section for inconsistencies identified between the PRMP/FEIS and available county growth plans.
DR-MTDK-MC-13-0122-3	In this regard, numerous local governments have expressed to me that the Draft RMP/EIS did not evaluate their resource plans, did not evaluate inconsistencies with such plans, and did not adequately analyze the economic impacts of its restrictions compared to local government resource plans. These same concerned local government leaders also feel they were surprised by many of the provisions contained within the Draft RMP/EIS, which were contrary to what they had reviewed in their role as cooperating local government and agency representatives. I urge you to ensure BLM officials fully utilize the cooperating agency process in good faith, with full disclosure, and with respect to the role these local citizen representatives have under federal and state law.	See Chapter 5, Consistency section for inconsistencies identified between the PRMP/FEIS and available county growth plans.
DR-MTDK-MC-13-0177-1	The BLM had a duty to provide adequate public notice and the opportunity for local governments and citizens to participate in the process. 42 U.S.C.A. § 4321, et seq; 43 U.S.C.A. Â§ 1712 (c)(9) & (f).	See Chapter 1 for Introduction and discussion of planning process. See Chapter 5, Consultation and Coordination for discussion of public involvement opportunities. See also Chapter 5, Consistency section for inconsistencies identified

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		between the PRMP/FEIS and available county growth plans.
DR-MTDK-MC-13-0177-10	The BLM had a duty to carefully consider the economic impacts of the Draft RMPs in the local areas impacted by the plans. <i>Laub v. United States Dept of Interior</i> , 342 F.3d 1080, 1087 (9th Cir. 2003). The BLM failed to comply with its legal duty, by eliminating local government review of the drafts and consistency review with local plans and failing to provide local government with adequate time to do so.	See Chapter 5, Consistency section for inconsistencies identified between the PRMP/FEIS and available county growth plans. See Chapter 4, Social and Economic, Economics section, for economic effects anticipated from BLM’s proposed actions. During plan initiation, all of the counties in the planning area were invited to become Cooperating Agencies and help BLM prepare the Draft RMP/EIS.
DR-MTDK-MC-13-0177-11	Pursuant to the Intergovernmental Cooperation Act ("ICA") and an Executive Order, the BLM had a duty to fully consider on the record the local government/cooperating agencies' plans and policies. 31 U.S.C.A. §§ 6501-6506; Executive Order 12373. The BLM failed to comply with its legal duty.	See Chapter 5, Consistency section for inconsistencies identified between the PRMP/FEIS and available county growth plans.
DR-MTDK-MC-13-0177-13	The BLM had a duty to coordinate with local governments. 16 U.S.C.A. § 3451 et seq. The BLM failed to comply with its legal duty.	See Chapter 5, Consistency section for inconsistencies identified between the PRMP/FEIS and available county growth plans. Available County Growth plans and county input were considered in the preparation of the RMP. At the onset of the RMP planning process the BLM invited entities of federal, tribal, state and county governments to collaborate with the BLM on the development of the Draft RMP/EIS by becoming cooperating agencies. The cooperating agencies provided input in the development of the Draft RMP/EIS.
DR-MTDK-MC-13-0177-2	The BLM had a duty to make the Draft RMP/EISs consistent with the local government approved resource-related plans. 40 C.F.R. Â§ 1610.3-2. The BLM failed to comply with its duty by not obtaining local plans or providing adequate opportunity for local government review of and comparison with the Draft RMP/EISs.	See Chapter 5, Consistency section for inconsistencies identified between the PRMP/FEIS and available county growth plans. Available County Growth plans were considered in the preparation of the RMP.
DR-MTDK-MC-13-0177-3	The BLM had a duty to include in the Draft RMPs written discussions of any inconsistencies with and possible conflicts between the proposed action and regional, State, and local land use plans. 40 C.F.R. § 1502.16.	See Chapter 5, Consistency section for inconsistencies identified between the PRMP/FEIS and available county growth plans. Available County Growth plans were considered in the preparation of the RMP.
DR-MTDK-MC-13-0177-5	The BLM had a duty to identify in writing any inconsistency of the Draft RMPs with any approved state or local plan or laws. 40 C.F.R. § 1506.2. The BLM failed to comply with its legal duty and did not propose or discuss possible amendments to or actions to mitigate or eliminate these inconsistencies.	See Chapter 5, Consistency section for inconsistencies identified between the PRMP/FEIS and available county growth plans. Available County Growth plans were considered in the preparation of the RMP.
DR-MTDK-MC-13-	The BLM had a duty to use the environmental analysis and proposals of cooperating agencies with jurisdiction by law or special expertise. 40 C.F.R. § 1501.6.	See Chapter 5, Consistency section for inconsistencies identified between the PRMP/FEIS and available county growth plans. Available County Growth plans and county input were

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0177-6		considered in the preparation of the RMP.
DR-MTDK-MC-13-0188-2	There is nothing in this RMP to indicate that there was a Consistency Review done, comparing this RMP to any land plans or growth policies that are in place and pertinent to Valley County, City of Glasgow, Town of Opheim, Town of Nashua, Town of Fort Peck, or any of the Town Sites located in Valley County. This would, and should be, a basic priority to any RMP that has such far reaching consequences.	See Chapter 5, Consistency section for inconsistencies identified between the PRMP/FEIS and available county growth plans.
DR-MTDK-MC-13-0193-4	40 CFR 1506.2 (CEQ)(d). To better integrate environmental impact statements into state and local planning processes, statements shall discuss any inconsistency of a proposed action with any approved state or local plan or laws (whether or not federally sanctioned). Where an inconsistency exists, the statement should describe the extent to which the agency's would reconcile its proposed action with the plan or law.	See Chapter 5, Consistency section for inconsistencies identified between the PRMP/FEIS and available county growth plans.
DR-MTDK-MC-13-0052-1	As a cooperating local government unit (MOU dated 2-22-2011) and a close associate of the over 50 local government units and their citizen members impacted by the Miles City RMP, it is our conclusion, and the conclusion of the other local government units we have spoken with, that the comment period for the Draft RMP-EIS is not adequate at this time to provide an opportunity for local government units and the persons affected by the RMP to complete a thorough and meaningful review of the Draft document and its impacts.	See Chapter 5, Public Comment Period on the Draft RMP/EIS. The public comment period on the Draft RMP/EIS was open for 90 days.
DR-MTDK-MC-13-0044-2	Lastly, it is our understanding that the BLM must comply with NEPA and FLPMA in this planning process. We are not sure that the short time frame to comment; during the busiest work season of the year, on documents that many negatively impacted people did not receive, even complies with the legal requirements of NEPA and FLPMA. Furthermore, it is our understanding that the BLM is holding open-house meetings instead of receiving formal comments on the Draft RMP/EIS. Again, we question whether this format and process complies with NEPA and FLPMA.	See Chapter 5, Public Comment Period on the Draft RMP/EIS. In compliance with NEPA, the BLM Miles City Field Office held Open House meetings to answer questions about the Draft RMP/EIS. The public comment period on the Draft RMP/EIS was open for 90 days. Members of the public could participate in either, or both, according to their preferences.
DR-MTDK-MC-13-0057-2	Lastly, it is our understanding that the BLM must comply with NEPA and FLPMA in this planning process. We are not sure that the short-timeframe to comment, during the busiest work season of the year, on documents that many negatively impacted people did not receive, even complies with the legal requirements of NEPA and FLPMA. Furthermore, it is our understanding that the BLM is holding open house meetings instead of receiving formal comments on the Draft RMP/EIS. Again, we question whether this format and process complies with NEPA and FLPMA.	See Chapter 5, Public Comment Period on the Draft RMP/EIS. In compliance with NEPA, the BLM Miles City Field Office held Open House meetings to answer questions about the Draft RMP/EIS. The public comment period on the Draft RMP/EIS was open for 90 days. Members of the public could participate in either, or both, according to their preferences.
DR-MTDK-	Lastly, it is our understanding that the BLM must comply with NEPA and FLPMA in this planning process. We are not-sure that the short-time frame to	See Chapter 5, Public Comment Period on the Draft RMP/EIS. In compliance with NEPA, the BLM Miles City Field Office

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MC-13-0063-2	comment on such an extensive document is appropriate. Furthermore, it is our understanding that the BLM is holding open house meetings instead of receiving formal comments on the Draft RMP/EIS. We question whether this format and process complies with NEPA and FLPMA.	held Open House meetings to answer questions about the Draft RMP/EIS. The public comment period on the Draft RMP/EIS was open for 90 days. Members of the public could participate in either, or both, according to their preferences.
DR-MTDK-MC-13-0117-2	Examples of the BLM's failure to analyze the direct and indirect historic, cultural, economic, and social effects: The BLM plans on cutting 100,000 acres and 2000 AUMs from livestock grazing use. However, there is inadequate or no review, analysis, or research on how this drastic cut in livestock grazing will impact the cultural, economic and social effects. Further, this area has been used for livestock grazing for more than 120 years, which would mean that the cut in livestock grazing would also have a negative effect on the historic use of the area. at 2-204-205.	See Chapters 2 and 4, Livestock Grazing section, for changes to the Proposed Alternative (E).
DR-MTDK-MC-13-0146-17	This paragraph states that livestock operators who had their permits cancelled would have to fence their allotments off from their private land with no help from the BLM. Does this mean fences have no effect on wildlife movements or mortality which was previously mentioned in the document?	See Chapters 2 and 4, Livestock Grazing sections, for text changes.
DR-MTDK-MC-13-0121-48	The Draft RMP does not present information to document whether noise levels are natural or generated by human activities. Indisputably, wind has a substantial effect on noise levels. Do natural factors such as wind increase median noise levels to 50 to 60 dBA at leks and if so, do natural factors such as wind noise reduce lek attendance? Clarification of these points has implications for monitoring leks to estimate population trends.	See Chapters 3 and 4, Fish, Aquatic and Wildlife Habitat, Including Special Status Species. These sections have been revised and include 2012 research and references to noise levels and effects.
DR-MTDK-MC-13-0142-19	Pg. 3-81 states, It should be noted that median noise levels for rural areas would range from 20 to 40 dBA in the morning and evening and from 50 to 60 dBA in the afternoon (when wind speeds would typically be the greatest) (Mariah Assoc. 2005). However, the Draft RMP does not present information to document under what conditions these samples were taken or whether they were instantaneous readings or measured over a weighted time frame such as 5, 10 or 15 minutes. Wind does indeed have a substantial effect on noise levels. Assuming this to be true, do natural factors such as wind noise reduce lek attendance? If it does, this could impact conclusions regarding population trends. It would seem more important to assess different sound frequencies to such as the dB(A) which approximates human response or the dB(C) which would assess lower frequencies to understand any correlation to sage-grouse.	See Chapters 3 and 4, Fish, Aquatic and Wildlife Habitat, Including Special Status Species. These sections have been revised and include 2012 research and references to noise levels and effects.
DR-MTDK-MC-13-0142-30	Pg. BMP-44. The statement is made "Limit noise to less than 10 decibels above ambient measures (20 to 24 dBA) at sunrise at the perimeter of a lek during active lek season". This requirement is completely inconsistent with the previous background of 39 dBA background plus the 10 decibel threshold.	See Chapters 3 and 4, Fish, Aquatic and Wildlife Habitat, Including Special Status Species. These sections have been revised and include 2012 research and references to noise levels and effects.

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	There is no peer reviewed data that supports a background noise limitation at dawn for a 20-24 background level. BLM needs to remove this item from the Proposed EIS/RMP and replace it with the 39 dBA which is currently in use when assessing noise considerations in sage grouse habitat. This requirement could constrain a multitude of mechanical activities essential to maintaining facilities and equipment.	
DR-MTDK-MC-13-0191-1	The discussion of Greater Sage-grouse does not include any mention of the COT Report, nor the specific localized and widespread threats and Priority Areas for Conservation (PACs) discussed therein that apply specifically to the two Greater Sage-grouse populations in the MCFO planning area (Yellowstone Watershed and Powder River Basin).	See Chapters 3 and 4, Fish, Aquatic and Wildlife Habitat, Including Special Status Species, Greater Sage-grouse sections for revisions. The COT Report threats and effects analysis from the proposed actions are included.
DR-MTDK-MC-13-0191-3	The Chapter 4 effects analysis for Greater Sage-grouse does not include clear metrics/effects indicators for each action; a consistently applied analysis framework across alternatives on which to base effects comparisons; a consistent effects determination (adverse, beneficial, neutral, etc.) for each alternative action; nor supporting rationale for each effect determination. For these reasons, we found it was not possible to clearly ascertain, understand, and evaluate the effects, both adverse and beneficial, to Greater Sage-grouse associated with the various alternative actions.	See Chapters 3 and 4, Fish, Aquatic and Wildlife Habitat, Including Special Status Species, Greater Sage-grouse sections for revisions. The COT Report threats and effects analysis from the proposed actions are included.
DR-MTDK-MC-13-0117-17	The agency has failed to adequately outline the quantitative and qualitative economic impacts on the private sector. Similarly, the economic analysis is completely void of any quantitative or qualitative costs and benefits to the State and local governments from imposition of the Draft RMP. The economic analysis section does note that the costs of managing the area may change under the RMP; however, there is no assessment of any impact to State or local governments.	See Chapters 3 and 4, Social and Economic section for revisions.
DR-MTDK-MC-13-0117-18	The UMRA requires that the agency estimate the future costs of complying with a federal mandate, as well as any disproportionate budgetary effects upon State or local governments or particular segments of the private sector. U.S.C. § 1532(a)(3). Nowhere in the Draft RMP does the BLM provide such an estimate. Furthermore, the BLM failed to provide an analysis of the budgetary impact to local communities from having to provide increased emergency services on the Draft RMP lands.	See Chapters 3 and 4, Social and Economic section for the description of social, economic and environmental justice conditions and trends.
DR-MTDK-MC-13-0121-40	What percentage of the MCFO planning area is within 6.9 kilometers of urban development and other infrastructure (e.g., highways, wind farms, communication towers) and how do these values affect management direction?	See Map 14. The Land Pattern Adjustment and Access Map shows major roads and county seats. See Chapter 4, Social and Economic, Social Conditions section for effects to urban areas from BLM's proposed actions.
DR-	To what extent is Montana Fish, Wildlife and Parks included in decisions	See the "Dear Reader" letter. Montana Fish, Wildlife and Parks

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MTDK-MC-13-0171-7	regarding fish and wildlife as they relate to the Public Trust?	is a Cooperating Agency in the preparation of the RMP, along with several counties, conservation districts, tribes, and state and federal agencies. In order to help prepare the Draft RMP/EIS, Cooperating Agencies were provided preliminary versions of the Draft RMP/EIS for their review, including Montana Fish, Wildlife and Parks. All of the proposed decisions in the RMP are BLM's. In general, however, the BLM manages habitat on public lands rather than the fish and wildlife themselves.
DR-MTDK-MC-13-0169-12	No map depicting the WSAs in the analysis area is provided. Nor is there a map showing the proposed action in relation to the WSAs. The Draft RMP references map 88 but that is incorrect a map depicting renewable energy potential, not WSAs. Volume IV of the Draft RMP (maps) references map 89 as a map of special designation areas (which would presumably include WSAs) but no map 89 exists.	See the "Special Designation Areas" Map displaying WSAs, Map 39.
DR-MTDK-MC-13-0089-12	Even though climate change emissions from the Alternatives may look minor when viewed in isolation, when considered cumulatively with all of the other methane emissions from BLM managed land they become significant and cannot be ignored.	See the Air Resource Technical Support Document available online on the BLM MCFO RMP webpage: <a href="http://www.blm.gov/mt/st/en/fo/miles_city_field_office/rmp.htm">http://www.blm.gov/mt/st/en/fo/miles_city_field_office/rmp.htm</a> . The BLM accounts for GHG emissions by including them in the emission inventories. GHG emission reductions are accomplished via USEPA and MDEQ regulations, as well as BLM best management practices. See the Mitigation Measures and Conservation Actions Appendix.
DR-MTDK-MC-13-0102-11	Pg. 16 - include the discussion of emissions associated with "production" sources, e.g., oil wells, gas wells, and CBNG wells, from the September 21, 2012 final near-field modeling protocol, pg. 8 - p. 17. Figure 1 illustrates the well pad and receptor layout for PM10 and PM2.5 modeling. Was this same receptor layout used for the other criteria pollutants? Pg. 22 - Predicted criteria air pollutant concentrations were compared to the NAAQS, MAAQS, and Prevention of Significant Deterioration (PSD) increments. The annual comparisons for the NAAQS and MAAQS need to be discussed in this paragraph.	See the Air Resource Technical Support Document available online on the BLM MCFO RMP webpage: <a href="http://www.blm.gov/mt/st/en/fo/miles_city_field_office/rmp.htm">http://www.blm.gov/mt/st/en/fo/miles_city_field_office/rmp.htm</a> . Section 2.2 provides a description of production sources. A clarification stating that well pad and receptor layouts for other (non-PM) modeled pollutants were similar for other pollutants was added in Section 3.3. Annual comparisons to the NAAQS and MAAQS were provided in Table 18 for those pollutants with annual averaging times.
DR-MTDK-MC-13-0146-18	Table 4-8 and 4-9. The estimated emissions from wildfires should definitely be included as it absolutely dwarfs all the other emissions combined. The effects of forced build up in fuel loads is going to wind up in some huge fires with monstrous emissions. The wildfire emissions, at least from previous years, should be averaged and used to project future emissions.	See the Air Resource Technical Support Document available online on the BLM MCFO RMP webpage: <a href="http://www.blm.gov/mt/st/en/fo/miles_city_field_office/rmp.htm">http://www.blm.gov/mt/st/en/fo/miles_city_field_office/rmp.htm</a> . Wildfire emissions for each alternative are provided. Footnotes to emission tables in Chapter 4, "Air Resources and Climate," Alternative-specific sections have been modified to explain that

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		wildfire emission estimates are included in the Air Resource Technical Support Document.
DR-MTDK-MC-13-0102-10	It is important that the emissions controls and mitigation measures used to develop the emissions inventory be included as required mitigation measures for activities under the RMP. The alternative specific emissions inventory includes an 84% control efficiency of gravel or scoria surfacing for calculating dust emissions. The ARTSD, pg. 6, identifies assumptions used in this emissions inventory, including a 50% fugitive dust control efficiency but no mention of this 84% control with gravel or scoria. If 84% surfacing control was used in the near-field modeling, then we recommend that this control efficiency be added to the identified assumptions on pg. 6 of the AR TSD and that gravel/scoria surfacing be added to the initial mitigation list of the ARMP, Section 6.1.	See the Air Resource Technical Support Document, Appendix F, available online on the BLM MCFO RMP webpage: <a href="http://www.blm.gov/mt/st/en/fo/miles_city_field_office/rmp.htm">http://www.blm.gov/mt/st/en/fo/miles_city_field_office/rmp.htm</a> 1. Near-field modeling was based on an emission inventory that assumed 50 percent fugitive dust control during construction.
DR-MTDK-MC-13-0089-44	BLM has noted many methane pollution mitigation measures in its Climate Change Supplementary Information Report. The report also addresses key mitigation technologies for oil production and Coal Bed Methane.	See the Air Resources and Climate Appendix, Miles City Field Office Air Resource Management Plan: Adaptive Management Strategy for Oil and Gas Resources, section 1.5.2 and Chapter 3, Air Resources and Climate, National Action to Reduce GHGs. A combination of current MDEQ and USEPA regulations require many GHG emission controls. For several of the emission sources mentioned, GHG emissions reported under the USEPA GHG Mandatory Reporting Rule constituted less than 1% of CO <sub>2</sub> e emissions from oil and gas activity in the region. The BLM encourages use of GHG-reducing BMPs provided in the Mitigation Measures and Conservation Actions Appendix. Also, methane reinjection does not avoid combustion emissions because power, typically provided by onsite engines combusting fossil fuel, is needed to reinject methane under pressure.
DR-MTDK-MC-13-0089-46	Best available methane emissions reduction technology would include at least the following, which are technically proven, commercially available and in most cases profitable: Green or reduced-emissions completions; Liquids unloading; Improved maintenance for compressors, dry seals; Pneumatic devices; TEG dehydrator emission controls; Desiccant dehydrators; Vapor recovery units; Pipelines; and Leak Monitoring and Repair.	See the Air Resources and Climate Appendix, Miles City Field Office Air Resource Management Plan: Adaptive Management Strategy for Oil and Gas Resources, section 1.5.2 and Chapter 3, "Air Resources and Climate," "National Action to Reduce GHGs." A combination of current MDEQ and USEPA regulations require many GHG emission controls. For several of the emission sources mentioned, GHG emissions reported under the USEPA GHG Mandatory Reporting Rule constituted less than 1% of CO <sub>2</sub> e emissions from oil and gas activity in the region. The BLM encourages use of GHG-reducing BMPs provided in the Mitigation Measures and Conservation Actions

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		Appendix.
DR-MTDK-MC-13-0097-23	In establishing enhanced mitigation requirements, the BLM states that "preference will be given to mitigation measures that the MDEQ intends to impose as new regulations or air quality permitting provisions." Pg. ARMP-18. But giving only "preference" to MDEQ-developed regulation is insufficient because it leaves open the possibility that BLM may replace MDEQ's careful balancing of environmental, economic, and technical benefits with BLM's own.	See the Air Resources and Climate Appendix, Miles City Field Office Air Resource Management Plan: Adaptive Management Strategy for Oil and Gas Resources, section 1.5.3. BLM land management actions do not replace or affect MDEQ regulations.
DR-MTDK-MC-13-0098-1	BLM has mischaracterized Montana's air quality program by only referencing the regulation of large stationary sources and not recognizing the full extent of Montana's Air Monitoring, Analysis, and Planning Program or Air Quality Permitting, Compliance and Registration Program.	See the Air Resources and Climate Appendix, Miles City Field Office Air Resource Management Plan: Adaptive Management Strategy for Oil and Gas Resources, section 1.5. An additional description of the MDEQ air quality program and associated regulations has been added.
DR-MTDK-MC-13-0098-10	BLM should consider establishing spatial limitations when requiring enhanced mitigation measures. It would be inappropriate to mandate mitigation measures for an entire planning area that are not consistent with the CAA.	See the Air Resources and Climate Appendix, Miles City Field Office Air Resource Management Plan: Adaptive Management Strategy for Oil and Gas Resources, Monitoring-Based Mitigation section for language limiting the geographic scope of mitigation measures.
DR-MTDK-MC-13-0098-12	Prior to completion of the photochemical grid modeling (PGM), BLM would review NAAQS exceedances and determine if enhanced mitigation is warranted. BLM has proposed to monitor EPA's Air Quality System (AQS) database to determine if monitoring data is showing an exceedance. It is not clear what criteria BLM will use to determine if an exceedance has occurred. BLM should include an explanation of how an exceedance will be determined in the RMP. Additionally, once data is posted to the AQS, even though available for review, the data may not be certified for several months. It would be inappropriate to compare uncertified data to the NAAQS.	See the Air Resources and Climate Appendix, Miles City Field Office Air Resource Management Plan: Adaptive Management Strategy for Oil and Gas Resources, Monitoring-Based Mitigation section for language requesting concurrence from the MDEQ and USEPA on any potential exceedances.
DR-MTDK-MC-13-0098-13	Following completion of the PGM, BLM has proposed to calculate site specific design values for each pollutant monitored at a federal reference monitor within the planning area. If a BLM calculated design value is greater than 85% of the NAAQS, enhanced mitigation measures would be evaluated and selected by the BLM, in cooperation with DEQ, etc., when appropriate. It is unclear what criteria BLM will use to determine when it is appropriate or not appropriate to consult with DEQ. Additionally, establishing a threshold of 85% of the NAAQS does not appear to have any legal basis within the CAA. It is unclear under what authority BLM plans to implement mitigation measures based on this proposed threshold.	See the Air Resources and Climate Appendix, Miles City Field Office Air Resource Management Plan: Adaptive Management Strategy for Oil and Gas Resources, Monitoring-Based Mitigation section for revised language indicating the MDEQ would always be consulted when identifying mitigation measures. The CAA does not include an 85 percent threshold; however, the BLM's mandate is to protect air resources. The BLM will begin reviewing oil and gas emission impacts when ambient monitoring indicates that air pollutant concentrations are approaching the NAAQS. This process should allow enough time to consult with MDEQ and formulate actions, if needed, in order to prevent NAAQS violations.

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DR-MTDK-MC-13-0098-3	The Bureau of Land Management (BLM) seems to disregard most of Montana's air quality program with reference only to DEQ regulating large stationary sources, which is not an accurate representation of DEQ's air quality programs.	See the Air Resources and Climate Appendix, Miles City Field Office Air Resource Management Plan: Adaptive Management Strategy for Oil and Gas Resources, section 1.5 for an additional description of the MDEQ air quality program and associated regulations.
DR-MTDK-MC-13-0102-3	The Air Resources Technical Support Document (ARTSD), pg. 6, states that Tier 4 emission standards were assumed in the Draft RMP near-field modeling analysis in order to demonstrate compliance with the 1-hr NO2 NAAQS. We note that the ARMP, Section 6.1, initial mitigation requirement for diesel drill rig engines >200 hp to meet Tier 4 emission standards for non-road diesel engines indicates that "oil and gas operators may use drill rig engines that exceed Tier 4 emission standards if modeling demonstrates compliance with the NAAQS and protection of AQRVs." We assume that this caveat means that additional near-field modeling will be required at the project-level if higher-emitting engines will be used.	See the Air Resources and Climate Appendix, Miles City Field Office Air Resource Management Plan: Adaptive Management Strategy for Oil and Gas Resources, section 6.1 for discussion. Text has been modified to state that modeling or monitoring may be used to demonstrate compliance if non-Tier 4 engines are used. Demonstrations may be made at the project level or at a programmatic level.
DR-MTDK-MC-13-0102-6	Section 1.5 of the ARMP includes a detailed discussion of requirements for oil and gas activities that were developed through the 2008 Montana Statewide Oil & Gas EIS (Statewide), some of which are being integrated into the MCFO ARMP. We note that two of the Statewide requirements that are not "carried forward" into this ARMP are requirements to (1) maximize the number of wells connected to each compressor and (2) utilize natural gas fired or electrical compressors or generators. We recommend that BLM provide its rationale for discontinuing these emission-reducing requirements. In addition, given that the Draft RMP and Monitoring Appendix note that coal bed natural gas activities in the Decker area will continue to be managed under the Statewide EIS, it is somewhat difficult to follow which Statewide and/or MCFO requirements apply where. It would be helpful to provide a table in the ARMP to clarify if/when/where each Statewide and/or MCFO requirement applies upon completion of the ROD.	See the Air Resources and Climate Appendix, Miles City Field Office Air Resource Management Plan: Adaptive Management Strategy for Oil and Gas Resources, section 1.6. Rationale has been added.
DR-MTDK-MC-13-0102-7	ARMP pg. 14-15: We understand that BLM intends to run the PGM to cover the full 20 year planning cycle of the RMP rather than performing an initial PGM run followed by periodic reassessments as described in Section 5.1.2 on p. ARMP-14. We recommend revising the text to clarify this point. In addition, we recommend revising Table ARMP-4 to include time in the schedule for the AQTW to review results from emissions modeling.	See the Air Resources and Climate Appendix, Miles City Field Office Air Resource Management Plan: Adaptive Management Strategy for Oil and Gas Resources, section 5.1.2 and Table pg. ARMP-4 for discussion.
DR-MTDK-MC-13-	ARMP Section 6.2.3 indicates that following PGM completion, BLM would calculate design values for each pollutant monitored at a federal reference monitor within the planning area. We recommend revising this language to	See the Air Resources and Climate Appendix, Miles City Field Office Air Resource Management Plan: Adaptive Management Strategy for Oil and Gas Resources, section 6.2.3 for revised

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0102-8	include federal equivalent method monitors since the PM10 monitors at Birney, Broadus and Sidney are federal equivalent method monitors (not federal reference method monitors).	language.
DR-MTDK-MC-13-0102-9	ARMP Section 6.2.4 does not include a timeline for implementation of enhanced mitigation after the PGM is completed. We recommend a 1-year timeline for implementation of measures after selection of enhanced mitigation, similar to the timeline provided for implementation of enhanced mitigation measures prior to PGM completion (see Section 6.2.2: "Selected mitigation measures would be implemented within 1 year after the BLM decision to apply additional mitigation").	See the Air Resources and Climate Appendix, Miles City Field Office Air Resource Management Plan: Adaptive Management Strategy for Oil and Gas Resources, section 6.3.2 for discussion.
DR-MTDK-MC-13-0104-5	We object to BLM's attempt to exceed both federal and state regulations by requiring compliance with a New Source Performance Standard (NSPS).	See the Air Resources and Climate Appendix, Miles City Field Office Air Resource Management Plan: Adaptive Management Strategy for Oil and Gas Resources, section 1.5.3 for a description of BLM authority to manage air resources.
DR-MTDK-MC-13-0121-11	The PM10 monitors are not appropriately placed to measure PM10 as defined by MDEQ. The document even quotes MDEQ as stating that the Birney and Broadus sites PM10 monitoring values are not indicative or representative of general PM10 concentrations in the desired monitored area (pg. 10-ARMP). Therefore, these monitors would not provide a reliable measure of PM10, and, therefore, must not be used to implement mitigation measures associated with PM10. As shown in Table 3-2, pg. 3-13 of the Draft RMP there is already a significant amount of air quality monitoring that is ongoing for not only a variety of pollutants, but also wet deposition and visibility monitoring in this Montana planning area. Because the Clean Air Act has already established extensive actions based on actual monitoring data, BLM should only use approved design values prior to implementing mitigation measures on sources in the planning area.	See the Air Resources and Climate Appendix, Miles City Field Office Air Resource Management Plan: Adaptive Management Strategy for Oil and Gas Resources.
DR-MTDK-MC-13-0121-6	The Draft RMP fails to acknowledge the EPA's approved air quality registration program for the oil and gas industry in which sources are required to control emissions and the State conducts compliance investigations to ensure that the requirements are met.	See the Air Resources and Climate Appendix, Miles City Field Office Air Resource Management Plan: Adaptive Management Strategy for Oil and Gas Resources, section 1.5.3.
DR-MTDK-MC-13-0133-1	4 of the 5 Alternatives include a proposal whereby the BLM would be establishing a separate air quality program from the State of Montana to regulate air quality impacts. In some cases, the requirements for mitigation go beyond what is currently required under the Clean Air Act.	See the Air Resources and Climate Appendix, Miles City Field Office Air Resource Management Plan: Adaptive Management Strategy for Oil and Gas Resources, sections 1.5.2 and 1.5.3 for an explanation on the interaction between the oil and gas registration program and BLM air resource management authority.
DR-	AQRV impacts are not assessed as a function of "new" versus "existing" air	See the Air Resources and Climate Appendix, Miles City Field

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MTDK-MC-13-0167-4	quality emission levels. Although referenced as a subjective analysis, FLAG guidance does not support such a determination.	Office Air Resource Management Plan: Adaptive Management Strategy for Oil and Gas Resources, section 5.1 for discussion. Cumulative impacts including new and existing emissions will be modeled using photochemical grid modeling to assess air quality and AQRV impacts.
DR-MTDK-MC-13-0104-16	Many different peer-reviewed studies show varying impacts on sage-grouse from oil and gas operations. Why has BLM not included information from these studies in the document? Are the impacts recorded for the (past) intense developments in Wyoming assumed to be typical of what would occur in the MCFO planning area with future oil and gas development?	See the Bibliography for references considered in preparation of the RMP. Assumptions for the analysis are found in Chapter 4. Impacts from Wyoming development were considered, but not automatically assumed to be the same.
DR-MTDK-MC-13-0169-22	First, not enough information is provided in the Draft RMP to properly assess NHPA compliance. For example, BLM states that it has inventoried the analysis area for cultural and historic properties but it appears from the Draft RMP that only a Class I literature review has occurred to date for the draft RMP. Second, the proposed action (or at least certain aspects of it) qualify as an undertaking triggering the need “now “to undertake a reasonable and good faith effort to identify cultural and historic properties. For example, the proposed action includes designating specific areas, including SRMAs, for OHV use. This is clearly an undertaking that will result in increased surface disturbance.	See the Bibliography reference Aaberg 2006. A Class I literature review has been conducted covering the entire planning area . Aaberg’s study reviewed all the previously conducted Class II and Class III on-the-ground inventories conducted within the planning area and all the cultural and paleontological sites recorded, as of 2006. Also, see Chapter 2; Comparison of Alternatives Table 2-5; Special Recreation Management Areas (SRMAs), Extensive Recreation Management Areas (ERMAs) and Public Lands not Designated section for changes to the Proposed Alternative (E). No new SRMAs are being proposed in Alternative E that are open for OHV use. The existing open OHV use areas have undergone cultural Class III inventories. Note, the existing open OHV areas are no longer recommended open in the PRMP/FEIS.
DR-MTDK-MC-13-0150-3	The Miles City Draft RMP references the 2006 guidance provide by the Avian Power Line Interaction Committee. Draft RMP at pg. 2-29. Please note that a newer APLIC guideline manual was released in 2012 and should be referenced.	See the Bibliography reference Avian Power Line Interaction Committee (APLIC) 2012. The reference has been added.
DR-MTDK-MC-13-0121-12	The Draft RMP lists a number of initial air mitigations that will require implementation measures upon signature of the ROD. Several of the measures deal with fugitive dust control. While fugitive dust should be controlled, meeting State requirements (Administrative Rule of Montana 17.8.308) clearly satisfies BLM’s objectives.	See the Bibliography reference Bureau of Land Management and the United States Forest Service 2007b; the BLM "Gold Book" where gravel, scoria, and other dust abatement measures are included in the BMPs.
DR-MTDK-MC-13-0190-7	Information in Chapter 2, Livestock Grazing, Action 9 suggests that there are 190,000 acres (nearly 300 square miles) of BLM grazing allotments in the MCFO RMP planning area that are failing to meet rangeland health standards as a result of poor grazing practices.	See the Bibliography reference for BLM Washington Office Instruction Memorandum 2014 - 124 (BLM 2012g). When a portion of an allotment is not meeting standards, all of the acreage within the allotment is counted as not meeting standards due to the scale assessed.

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DR-MTDK-MC-13-0142-17	Pg. 4-135 - contains the statement "The efficacy of BLM NSO stipulations for leasing and development within 0.25 miles of a lek would result in an estimated lek persistence (the ability of leks to remain on the landscape) of approximately 5 percent, while lek persistence in areas without oil and gas development would be expected to average 85 percent." Source references/citations are needed for this statement.	See the Bibliography reference Knick, S.T. 2011 for timeframes and specifics on lek persistence. See Chapter 4 for revisions of the analyses.
DR-MTDK-MC-13-0121-38	Pg. 3-80 " Nearly 16 percent of Sage-Grouse Management Zone 1 is within 3 kilometers of oil and gas wells, a distance in which ecological impacts are likely to occur (Knick et al 2011). Much of the current oil and gas development is occurring on private lands, with little or no mitigation efforts, which elevates the ecological and conservation importance of sage-grouse habitat on public lands. Please provide the source of information (citation) which states that current oil and gas development is occurring on private land with little or no mitigation efforts.	See the Bibliography reference Knick, S.T. 2011. Also, see Chapter 3, Fish, Aquatic and Wildlife Habitat, Including Special Status Species; Special Status Species (Aquatics, Avian and Terrestrial); Special Status Species - Avian; Greater Sage-grouse section for revisions.
DR-MTDK-MC-13-0121-50	Pg. 4-162 " Because it would take 4 or more years from initiation of disturbance to noticeable population responses, impacts may not be known at or prior to the project initiation stage. This statement is not supported by a citation. Why would it take 4 or more years to detect population effects?	See the Bibliography reference Knick, S.T. 2011. The time lag effect has been observed and documented in the Pinedale Anticline (Wyoming) and the Powder River Basin (Montana).
DR-MTDK-MC-13-0142-20	Page 4-162 - "Because it would take 4 or more years from initiation of disturbance to noticeable population responses, impacts may not be known at or prior to the project initiation stage." COMMENT: This statement is not supported by all the monitoring that already occurs. Annual monitoring would detect any changes and allow trending analysis to occur over time. It should also be noted that besides surface disturbance, other factors need to be considered such as predation and weather affects (especially drought). The reference to 4 years implies an impact threshold that seems to be lacking science based information and should be removed from the FEIS.	See the Bibliography reference Knick, S.T. 2011. The time lag effect has been observed and documented in the Pinedale Anticline (Wyoming) and the Powder River Basin (Montana).
DR-MTDK-MC-13-0142-18	Pg. 4-135 - "Male lek attendance would be expected to be reduced when subjected to the current standard noise limitation of 50 decibels at the lek site." What is the source (citation) of this information?	See the Bibliography reference Patricelli, G.L. 2010 for more information. See Chapter 4 for revisions of the analyses.
DR-MTDK-MC-13-0104-26	Pg. 4-135- "Male lek attendance would be expected to be reduced when subjected to the current standard noise limitation of 50 decibels at the lek site." Citations are needed for this information.	See the Bibliography reference Patricelli, G.L. 2010. See Chapter 4 for revisions of the analyses.
DR-MTDK-MC-13-	Pg. 4-130 " Sage-grouse Management. BLM needs to clearly explain assumptions made in this section concerning sage-grouse management. According to the Draft RMP, there is an assumption that male sage-grouse lek	See the Bibliography reference Reese and Bowyer 2007 for more information. Although Greater Sage-grouse population numbers can be difficult to estimate, counting males on leks provides

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0121-42	attendance is a reliable index of population numbers and trends. Ramey et al (2011) indicate that the reduction in male lek counts has been assumed to equate to populations; however, this hypothesis has not been tested with probability based population counts. Does MCFO assume that male attendance on leks is in direct proportion to population size? If so, what is the scientific justification for this assumption? If not, what is the statistical relationship between male lek attendance and population size, and why?	insight to population trends.
DR-MTDK-MC-13-0121-30	Pg. 3-74 “ In portions of Sage-Grouse Management Zone 1, sage-grouse populations have declined through wholesale loss of habitat and through impacts of disturbance and direct mortality to birds on the remaining habitat. What is BLM’s source (citation) for this information and please clarify which portions of Sage-Grouse Management Zone 1 and/or which parts of the MCFO planning area to which this statement applies?	See the Bibliography reference Samson et al. 2004 for more information. Numerous sources of direct and indirect mortality are addressed. The planning area is entirely within Management Zone 1. Knick, S.T. 2011 is the reference.
DR-MTDK-MC-13-0142-9	Pg. 3-74 - "In portions of Sage-Grouse Management Zone 1, sage-grouse populations have declined through wholesale loss of habitat and through impacts of disturbance and direct mortality to birds on the remaining habitat." What is BLM's source of this information and please clarify which portions of Sage-Grouse Management Zone 1 and/or which parts of the MCFO planning area to which this statement applies?	See the Bibliography reference Samson et al. 2004 for more information. Numerous sources of direct and indirect mortality are addressed. The planning area is entirely within Management Zone 1. Knick, S.T. 2011 is the reference.
DR-MTDK-MC-13-0121-41	Pg. 3-82 “ The greater sage-grouse range in Sage-Grouse Management Zone 1 is very similar to overall portions of the range in which sage-grouse have been extirpated already (i.e., areas with high human footprints), mostly because of the abundance of and distribution of sagebrush occurring in Sage-Grouse Management Zone 1 (Wisdom, Meinke, Knick, and Schroeder 2011), which suggests sage-grouse in Sage-Grouse Management Zone 1 are more vulnerable to declines than those in other portions of sage-grouse range.” If Sage-Grouse Management Zone 1 is very similar to overall portions of the range in which sage-grouse have been extirpated, mostly because of the abundance and distribution of sagebrush, please explain why the seven sage-grouse management zones were delineated based on floristic provinces.	See the Bibliography reference Stiver et al. (2006, pg. 1-11) for more information on the zones.
DR-MTDK-MC-13-0121-17	Without a clear explanation for the seven year active (lek) definition, this restriction is unreasonable and arbitrary.	See the Bibliography reference United States Fish and Wildlife Service, 2002d. The 7-year period is a known preferred prey species fluctuation from population high to lows and provides protection for unoccupied raptor nests.
DR-MTDK-MC-13-0142-4	What is the scientific justification for a nest considered to be "active" if it has been used in the past seven years?	See the Bibliography reference United States Fish and Wildlife Service, 2002d. The 7-year period is a known preferred prey species fluctuation from population high to lows and provides protection for unoccupied raptor nests.

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DR-MTDK-MC-13-0108-4	A recent USGS report on Coal Geology, Resources, and Reserves in the Montana Powder River Basin supports the need to update the coal development information in the Draft RMP. That report, released in February 2013, acknowledges that [r]esources once considered to be subeconomic, may be elevated to the status of reserves with continued favorable sales prices as well as productivity and technological advances in mining. Therefore, reserve studies should be considered a cyclic process and models should be adjusted periodically using the most recent data and reassessed using the most current recovery technology and economics. See Haacke, Scott, Osmonson, Luppens et al., Assessment of Coal Geology, Resources, and Reserves in the Montana Powder River Basin at 31-32, Open File Report 2012-2013, USGS (hereinafter USGS Report), available at <a href="http://pubs.usgs.gov/of/2012/1113/OF12-1113.pdf">http://pubs.usgs.gov/of/2012/1113/OF12-1113.pdf</a> .	See the Bibliography reference United States Geological Survey 2013. The USGS report has been considered and is now incorporated as a reference.
DR-MTDK-MC-13-0108-2	The Draft RMP should be revised to identify additional coal areas of interest to address (1) improved conventional mining methods and new mining techniques and technologies that have been developed and/or refined since the 1985 and 1996 RMPs (e.g., underground coal gasification, microbial conversion, more efficient conventional mining methods, and other coal-conversion technologies), (2) demonstrated interest in coal exploration and development in the past two decades, and (3) documentation of updated geologic resources prepared by the U.S. Geologic Survey (USGS) and others. BLM should provide for additional development of coal reserves on BLM-administered surface land and mineral estates within the planning period of this RMP, consistent with current energy and mineral development policies.	See the Bibliography reference USGS 2013. The cited USGS report has been incorporated as a reference in the PRMP/FEIS. The USGS coal estimate report was conducted as a requirement of the Energy Policy Act and is not a substitute for the coal screens required by 43 CFR 3420.1-4.
DR-MTDK-MC-13-0108-7	The USGS Report identifies substantially more available coal resources "more than 162 billion short tons" in the Montana Powder River Basin, with approximately 35 billion short tons identified as recoverable. USGS Report at 31. The Draft RMP/EIS' statement that approximately 1.2 billion tons are considered recoverable refers only to reserves at producing mines and is not representative of the coal development potential within the resource management area. The coal development potential area shown on Map 76 should be expanded to include the recoverable coal resources identified by the USGS.	See the Bibliography reference USGS 2013. The cited USGS report is incorporated as a reference in the PRMP/FEIS. The USGS coal estimate report was conducted as a requirement of the Energy Policy Act and is not a substitute for the coal screens required by 43 CFR 3420.1-4.
DR-MTDK-MC-13-0121-36	Taylor et al (2007) analyzed six oil and gas development areas in Wyoming with various degrees and ages of activity to determine sage-grouse population trends relative to intensity and timing of oil and gas development. Scientists studying sage-grouse clearly have varying interpretations concerning effects of oil and gas development on population trends. Has BLM considered results of studies conducted by Ramey et al (2011) and Taylor et al (2007) in addressing	See the Bibliography, Ramey reference. The Taylor reference is unpublished.

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	the effects of oil and gas development on sage-grouse and sage-grouse habitat?	
DR-MTDK-MC-13-0104-25	Pg. 4-135 - "The efficacy of BLM NSO stipulations for leasing and development within 0.25 miles of a lek would result in an estimated lek persistence (the ability of leks to remain on the landscape) of approximately 5 percent, while lek persistence in areas without oil and gas development would be expected to average 85 percent. " References and citations must be provided.	See the Bibliography, reference Walker et al. 2007 for more information.
DR-MTDK-MC-13-0104-18	Pg. 3-80 - "Nearly 16 percent of Sage-Grouse Management Zone 1 is within 3 kilometers of oil and gas wells, a distance in which ecological impacts are likely to occur (Knick et al 2011). Much of the current oil and gas development is occurring on private lands, with little or no mitigation efforts, which elevates the ecological and conservation importance of sage-grouse habitat on public lands. " Please provide the source of information stating much of the current development is on private lands.	See the Bibliography. Knick et al 2011 is the reference.
DR-MTDK-MC-13-0104-13	Pg. 3-74- "In portions of Sage-Grouse Management Zone 1, sage-grouse populations have declined through wholesale loss of habitat and through impacts of disturbance and direct mortality to birds on the remaining habitat." What is the source of this information and which parts of Zone 1 and/or the MCFO planning area does this statement apply to?	See the Bibliography. Samson et al. 2004 is the reference.
DR-MTDK-MC-13-0094-2	Publish in your RMP the right of protest and appeal to the Interior Board of Land Appeals, and how.	See the Dear Reader letter at the front of the document for instructions on protesting or appealing the proposed decisions in the PRMP/FEIS.
DR-MTDK-MC-13-0121-44	How will the WMPP stipulations, including provisions for monitoring and adaptive management discussed therein, be carried forward with respect to implementation of the RMP?	See the Fish, Aquatic and Wildlife Habitat, Including Special Status Species Appendix. The WMPP has been removed. For mitigation and monitoring recommendations, see Greater Sage-Grouse (GRSG) Required Design Features Appendix; the Greater Sage-Grouse (GRSG) Monitoring Framework Appendix, the Mitigation Measures and Conservation Actions Appendix and the Monitoring Appendix.
DR-MTDK-MC-13-0162-3	The Wildlife Monitoring Protection Plan: the process for annual reports and meetings needs to include specific dates at the time of the ROD not an uncertain date to be developed later. The adaptive management process described for use does not conform to the DOI Manual on Adaptive Management. Thresholds and other commitments are vague and need specifics (e.g., 10% decline in population) Protocols for some monitoring are not likely to be effective (e.g., 5-year interval for lek searches, 1x visits/season for lek activity determination) and need to be based on recommendations for all sources, including the NTT Team recommendations and newly available	See the Fish, Aquatic and Wildlife Habitat, Including Special Status Species Appendix, Wildlife, for updates. The Wildlife Monitoring and Protection Plan has been removed.

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	scientific publications and guidance, not just the BLM MT sage grouse working group. Some of the dates for seasonal restrictions need to be consistent with latest recommendation from recent WAFWA recommendations or reasons given as to the divergence.	
DR-MTDK-MC-13-0190-10	The use of the term "permanent water" is confusing. It suggests that in order to have a riparian area you must also have a perennial stream.	See the Glossary definition for "Riparian Area". The definition has been modified.
DR-MTDK-MC-13-0098-5	The Draft RMP contains numerous terms with unique legal and technical meaning and implications under the CAA. In many cases, the draft RMP terminology is not clearly defined and may have different meanings than established by the CAA (i.e. "adverse impacts, increment analysis, air quality related values, design value, etc.)	See the Glossary for definitions of air resource terms, including exceedance, exceptional event, design value, prevention of significant deterioration increment and increment analysis, potential to emit, and air quality related value.
DR-MTDK-MC-13-0191-18	Several proposed actions in Table 2-1 are conditioned such that they would not impact the "functionality" of Greater Sage-grouse habitat, or would be allowed if they "improved or maintained" Greater Sage-grouse habitat. However, no definitions, criteria/standards, or assessment methodologies are provided for these terms. We recommend that such definitions, criteria/standards, and proposed assessment methodologies be provided	See the Glossary for definitions, such as "Functional habitat".
DR-MTDK-MC-13-0190-6	For Water, Action 7, under Alternative E, please define the term "floodplain." Is it the 25-yr, 100-yr, 500-yr?	See the Glossary for definitions.
DR-MTDK-MC-13-0142-26	BLM has failed in the Draft RMP to differentiate between what constitutes a BMP, Mitigation Guidelines, and even what constitutes a regulatory requirement.	See the Glossary for definitions. Also, see the Greater Sage-Grouse (GRSG) Required Design Features Appendix and the Mitigation Measures and Conservation Actions Appendix for revisions. The BMP Appendix is now the Greater Sage-Grouse (GRSG) Required Design Features Appendix, where all Greater Sage-grouse mitigation is found; and the Mitigation Measures and Conservation Actions Appendix, for all remaining BMPs.
DR-MTDK-MC-13-0151-1	Chapter 2, pg.s 43 & 44, Actions 6 & 7 state that surface disturbing activities are to be avoided within 2 miles of leks and it also states low voltage power lines would need to be buried. How can we bury the power lines without disturbing the surface?	See the Glossary for the definition of "avoidance areas". Avoid does not equate to not allowed or allowed in every instance. Also, see also Chapter 2, Greater Sage-Grouse (GRSG) Habitat Management section and its subsections for revisions.
DR-MTDK-MC-13-0133-4	The Draft RMP indicates, that proposed ROW must be "compatible with the purpose for which the area was designated" and "not otherwise feasible on lands outside the avoidance area." However, these statements do not specify any standards by which such determinations will be made.	See the Glossary. The definition for "Avoidance Areas" has been reworded to provide a better explanation.

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DR-MTDK-MC-13-0097-26	The standard for evaluating proposals to develop in avoidance areas should be revised. The standard given in the glossary is that such proposals must be: (1) "compatible with the purpose for which the area was designated"; and (2) "not otherwise feasible on lands outside the avoidance area." Draft RMP pg. GLO-3.	See the Glossary. The definition for "Avoidance Areas" has been reworded to provide a better explanation.
DR-MTDK-MC-13-0076-9	Perch discouragers were originally designed to reduce raptor electrocutions by moving birds from an unsafe (electrocution risk) perching location to a safer alternative, either on the same structure or a nearby structure on the same line. Recent data has documented poor effectiveness in perch discouragers and greater effectiveness of covers for preventing electrocutions (see Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006 [APLIC 2006], pgs. 17-18).	See the Greater Sage-Grouse (GRSG) Required Design Features Appendix and the Mitigation Measures and Conservation Actions Appendix for revisions. The BMP Appendix is now the Greater Sage-Grouse (GRSG) Required Design Features Appendix, where all Greater Sage-grouse mitigation is found; and the Mitigation Measures and Conservation Actions Appendix, for all remaining BMPs. Note, the operator must comply with the most recent APLIC guidelines which include the use of covers.
DR-MTDK-MC-13-0092-1	It is unclear what BMPs BLM would apply within the planning area and whether they would be applied consistently.	See the Greater Sage-Grouse (GRSG) Required Design Features Appendix and the Mitigation Measures and Conservation Actions Appendix for revisions. The BMP Appendix is now the Greater Sage-Grouse (GRSG) Required Design Features Appendix, where all Greater Sage-grouse mitigation is found; and the Mitigation Measures and Conservation Actions Appendix, for all remaining BMPs.
DR-MTDK-MC-13-0092-2	Some of the BMPs are incomplete. For example, neither the Montana or NTT BMPs for grazing management prescribe a minimum grass height in sage-grouse nesting and brood-rearing habitat, which the Draft RMP identified as important for predator avoidance (pg. 4-160).	See the Greater Sage-Grouse (GRSG) Required Design Features Appendix and the Mitigation Measures and Conservation Actions Appendix for revisions. The BMP Appendix is now the Greater Sage-Grouse (GRSG) Required Design Features Appendix, where all Greater Sage-grouse mitigation is found; and the Mitigation Measures and Conservation Actions Appendix, for all remaining BMPs. Also, see Chapter 2, Greater Sage-Grouse (GRSG) Habitat Management section and its subsections for addition text.
DR-MTDK-MC-13-0104-11	Pg. BMP-43 -"Require noise shields when drilling during the lek, nesting, brood-rearing, or wintering season." There is no information regarding exactly what constitutes a noise shield or at what distance from the lek it would be required. Further, there are many engineering issues that may prevent installation.	See the Greater Sage-Grouse (GRSG) Required Design Features Appendix and the Mitigation Measures and Conservation Actions Appendix for revisions. The BMP Appendix is now the Greater Sage-Grouse (GRSG) Required Design Features Appendix, where all Greater Sage-grouse mitigation is found; and the Mitigation Measures and Conservation Actions Appendix, for all remaining BMPs.
DR-MTDK-	The BMPs should be modified to make it clear that the actions are required for oil and gas drilling operations only.	See the Greater Sage-Grouse (GRSG) Required Design Features Appendix and the Mitigation Measures and Conservation

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MC-13-0108-20		Actions Appendix for revisions. The BMP Appendix is now the Greater Sage-Grouse (GRSG) Required Design Features Appendix, where all Greater Sage-grouse mitigation is found; and the Mitigation Measures and Conservation Actions Appendix, for all remaining BMPs. Note, BMPs apply to the entire RMP, not just the oil and gas sections.
DR-MTDK-MC-13-0133-5	While we understand the need to co-locate facilities, reasons other than erosion may make this infeasible. For example, different operators on adjoining leases may be unable to co-locate facilities due to different safety and operating practices. Therefore, we recommend that the following phrase be added to this statement, "to the extent technically and economically feasible."	See the Greater Sage-Grouse (GRSG) Required Design Features Appendix and the Mitigation Measures and Conservation Actions Appendix for revisions. The BMP Appendix is now the Greater Sage-Grouse (GRSG) Required Design Features Appendix, where all Greater Sage-grouse mitigation is found; and the Mitigation Measures and Conservation Actions Appendix, for all remaining BMPs.
DR-MTDK-MC-13-0142-28	Pg. BMP-3 (I): the subsections states "Interim and final reclamation would begin within 25 days of the disturbance. Interim reclamation would be completed to within a few feet of facilities." It is inappropriate to require any reclamation activities to begin within 25 days of disturbance. While pipeline reclamation is typically conducted in conjunction after a line is installed, it could be difficult to meet even for linear projects if certain circumstance occurred. Language should be inserted that follows existing guidance for right of ways regarding reclamation timing.	See the Greater Sage-Grouse (GRSG) Required Design Features Appendix and the Mitigation Measures and Conservation Actions Appendix for revisions and explanation. The BMP Appendix is now the Greater Sage-Grouse (GRSG) Required Design Features Appendix, where all Greater Sage-grouse mitigation is found; and the Mitigation Measures and Conservation Actions Appendix, for all remaining BMPs.
DR-MTDK-MC-13-0142-29	It is virtually impossible to remove all oil from a pipeline prior to Hydrotesting. Therefore a better description of the pre-cleaning methodology should be included in the BMP.	See the Greater Sage-Grouse (GRSG) Required Design Features Appendix and the Mitigation Measures and Conservation Actions Appendix for revisions and explanation. The BMP Appendix is now the Greater Sage-Grouse (GRSG) Required Design Features Appendix, where all Greater Sage-grouse mitigation is found; and the Mitigation Measures and Conservation Actions Appendix, for all remaining BMPs.
DR-MTDK-MC-13-0191-11	There are no West Nile virus measures in the Fish and Wildlife Appendix, as stated.	See the Greater Sage-Grouse (GRSG) Required Design Features Appendix for discussion.
DR-MTDK-MC-13-0196-1	It is unclear what BMPs BLM would apply within the planning area and whether they would be applied consistently.	See the Greater Sage-Grouse (GRSG) Required Design Features Appendix and the Mitigation Measures and Conservation Actions Appendix for revisions and explanation. The BMP Appendix is now the Greater Sage-Grouse (GRSG) Required Design Features Appendix, where all Greater Sage-grouse mitigation is found; and the Mitigation Measures and

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		Conservation Actions Appendix, for all remaining BMPs.
DR-MTDK-MC-13-0166-2	At pg. LAN-8, it is noted that the lands of the Custer National Forest are withdrawn but the acres are not known. The Custer National Forest lands addressed in the Draft RMP consist of the Ashland District and the Montana portion of the Sioux Ranger District. We are not aware of locatable mineral resources on these lands.	See the Lands and Realty - Renewable Energy Appendix. The reference to these types of Forest Service withdrawals has been removed from the document.
DR-MTDK-MC-13-0190-16	Livestock Grazing Appendix, pg. LVG-2, Figure 1. Please describe the process/criteria for determining whether or not resource management opportunities are "limited."	See the Livestock Grazing Appendix. The Authorized Officer makes the determination if opportunities are limited, based on the factors listed on the Flowchart page.
DR-MTDK-MC-13-0108-19	In the past, some BLM offices have interpreted oil and gas NSO and CSU stipulations as applicable to all mineral development. Because the stipulations are specific to oil and gas leasing, the RMP should expressly confirm that they are not applicable to coal leasing and development, which is subject to its own coal screening process.	See the Minerals Appendix, Fluid Minerals, Lease Stipulations section for revisions. Oil and gas stipulations only apply to oil and gas lease operations.
DR-MTDK-MC-13-0121-24	Under Alternative E, a CSU stipulation would be included for oil and gas leases in the Sage-Grouse Restoration Area. How would these stipulations be developed and what factors would be evaluated in determining the stipulations?	See the Minerals Appendix, Fluid Minerals, Lease Stipulations section for a list of all stipulations, including CSU.
DR-MTDK-MC-13-0121-61	Two of the three Draft RMPs reviewed indicate that CSU stipulations will be developed for activities in various sage-grouse habitats; however, BLM fails to specify in the MCFO Draft RMP how CSU such stipulations will be formulated.	See the Minerals Appendix, Fluid Minerals, Lease Stipulations section for a list of all stipulations, including CSU.
DR-MTDK-MC-13-0123-1	No Surface Occupancy (NSO) does not seem to mean (as would be expected) no occupation of the land surface. There are too many exceptions offered and no public process spelled out that will allow the public to comment anytime exceptions are made. This needs to be corrected. If exceptions are made to NSO, the BLM needs to notify interested parties and allow for public comment, including an analysis under the National Environmental Policy Act.	See the Minerals Appendix, Fluid Minerals, Lease Stipulations; Implementation of Waivers, Exceptions or Modifications section for the process of using WEMs.
	Pg. 3-164, at the bottom of the page states "The MCFO has responded to a number of vehicular accidents that involved the accidental release of hazardous materials or petroleum products from transport vehicles. The hazardous materials management program may become involved with a particular response action or cleanup when the release affects BLM-administered lands." This is the only mention of this "hazardous materials management program" and there is no explanation of their involvement in these cleanups or when their involvement is necessary.	See the Minerals Appendix, Fluid Minerals, Oil and Gas. An undesirable events section was added under the Fluid Minerals Operations and Procedures section.
	The 2010 Energy Lease Reforms should be fully implemented; it is hard to tell	See the Minerals Appendix, Fluid Minerals, Operating Standards

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	<p>if this RMP does that. The MCFO has an opportunity to expand MLP efforts in more than one area covered by the RMP, as the majority of the BLM lands are unleased as of 2011 (4.8 Million Acres or 76.5%).</p>	<p>and Approval Procedures section. Operations and procedures have been revised to show the Leasing Reform fully implemented in accordance with WO IM No. 2010-117. Also, an area must meet certain criteria to be considered an MLP. The entire planning area was evaluated per the MLP criteria. See Chapter 2, Minerals, Oil &amp; Gas, Proposed Carter MLP Area section. Note, although the Carter MLP area is considered for MLP treatment in Alternative C, no areas are recommended for an MLP in the Proposed Plan/Alternative (E).</p>
<p>DR-MTDK-MC-13-0097-18</p>	<p>Pg. MIN-55 states: "As part of approval, an EA is completed for each APD." This statement is incorrect. As a matter of law, an APD approval may be subject to a categorical exclusion from NEPA analysis. The Energy Policy Act of 2005 provides five statutory categorical exclusions from NEPA review that may be used to authorize oil and gas development on federal oil and gas leases. 42 V.S.C. § 15942(b). The RMP and EIS should recognize that these categorical exclusions may exempt future oil and gas development from additional NEPA analysis, and that not all APDs will require preparation of an EA.</p>	<p>See the Minerals Appendix, Fluid Minerals, Operating Standards and Approval Procedures section for revisions.</p>
<p>DR-MTDK-MC-13-0171-10</p>	<p>Each of the new high tech oil/gas wells (Hydraulically Fractured or Fracked) will utilize 2-3 million gallons of water during fracking and most of this total comes back out with the oil and gas. How will these impacts to the land and aquifer be managed?</p>	<p>See the Minerals Appendix, Fluid Minerals, Operating Standards and Approval Procedures section for detail on the disposal of produced water and the safeguards used to protect groundwater quality during drilling operations.</p>
<p>DR-MTDK-MC-13-0171-11</p>	<p>How will management look in the event of a large water event and pits overflowing onto the landscape and quite possibly local water sources?</p>	<p>See the Minerals Appendix, Fluid Minerals, Production and Development, Water Production section specifying produced water disposal would follow the requirements of Onshore Oil and Gas Order No. 7, Disposal of Produced Water (BLM 1993).</p>
<p>DR-MTDK-MC-13-0134-6</p>	<p>It is not clear in the RMP why parts of the Bakken were not considered for Master Leasing Plans and if Master Development Plans were also a possibility. This needs to be considered.</p>	<p>See the Minerals Appendix, Fluid Minerals, Proposed Carter Master Leasing Plan Area, Background section. An area must meet certain criteria to be considered an MLP. The entire planning area was evaluated per the MLP criteria. Master Development Plans are more often developed after a lease or leases are issued, such as when a full-field development plan is considered for approval and implementation.</p>
<p>DR-MTDK-MC-13-0104-29</p>	<p>Pg. 4-175- "Areas of development in which 8 or more well pads per section were allowed, in combination with the existing and proposed development occurring across the Montana border in Wyoming, would potentially result in the complete loss of sage-grouse in these areas. •Pg. 4-165 "Areas of development in which 8 or more wells pads per section were allowed, in</p>	<p>See the Minerals Appendix, Fluid Minerals, Reasonably Foreseeable Development Scenarios for Resource Management Plan Alternatives section for the anticipated projections of future drilling activity which provides estimates of new wells per township.</p>

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	combination with existing and proposed development occurring across the Montana border in Wyoming, would potentially result in the complete loss of sage-grouse in these areas." Under the preferred alternative E, how is the issue of well-pad density addressed? What are the projected well-pad densities in the various categories of sage-grouse habitat? On what is the conjecture based that 8 or more well pads per section and some undefined level of additional development would result in the complete loss of sage-grouse?	
DR-MTDK-MC-13-0121-52	Under Alternative E, what are the projected well-pad densities in the various categories of sage-grouse habitat? Moreover, what scientific citation has BLM relied upon to make the assumption?	See the Minerals Appendix, Fluid Minerals, Reasonably Foreseeable Development Scenarios for Resource Management Plan Alternatives section for the anticipated projections of future drilling activity which provides estimates of new wells per township.
DR-MTDK-MC-13-0162-2	In the Reasonably Foreseeable Development scenario (used by BLM to estimate energy development potential) over 3,300 wells are projected in moderate/low potential in the next 20 years, which seems to be contrary to the reason BLM gave for not analyzing the TRCP Sportsmen Area alternative (i.e., low potential).	See the Minerals Appendix, Fluid Minerals, Reasonably Foreseeable Development Scenarios for Resource Management Plan Alternatives section for changes to the oil and gas RFD.
DR-MTDK-MC-13-0121-59	Is it assumed that if a particular Surface acreage is under BLM Management then the mineral estate within that same acreage is also under BLM Administered Federal Mineral Estate and/or Oil and Gas Lease as well?	See the Minerals Appendix, Fluid Minerals, Split Estate section. BLM administered surface does not always overlie BLM administered minerals.
DR-MTDK-MC-13-0108-11	The Draft RMP should, at a minimum, continue to assume that a mine and end-use facility, similar to generic mine and facility described in Minerals Appendix, will be developed in the Big Dry RMP area during the life of the plan. It should also analyze the impacts of such a mine and end-use facility.	See the Minerals Appendix, Solid Minerals RFD, Coal section. BLM has updated the RFDs for the planning area based on the updated coal forecast by U.S. Energy Information Administration (EIA)'s Annual Energy Outlook 2013.
DR-MTDK-MC-13-0105-7	On pg. MIN-137 there is discussion about Surface Owner Consent. The RMP states that this RMP did not attempt to obtain information regarding Surface Owner Consent.	See the Minerals Appendix, Solid Minerals RFD, Coal section. Consultation with qualified surface owners is required (43 CFR 3420.1-4(4)(i)) as part of the coal leasing process either while preparing a comprehensive land use plan or land use analysis. . During implementation, all coal screens will be applied, as appropriate, during environmental analysis conducted in response to site-specific lease applications. The RFD for the coal mines has been updated.
DR-MTDK-MC-13-0067-2	Under the coal section of the minerals appendix (MIN-157) that there was a statement on Decker Coal as follows: It is not anticipated that the operators of this mine will need to lease additional federal coal reserves; subsequently, an RFD is not necessary. On April 12th, 2013 Decker entered into a Memorandum of Understanding with the Department of the Interior, Bureau of Land	See the Minerals Appendix, Solid Minerals RFD, Coal section. The RFD for the Decker Mine has been updated.

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	Management for the purpose of preparing an environmental assessment for the Decker Coal Lease Modification at the West Decker Mine.	
DR-MTDK-MC-13-0108-10	This limited RFD scenario for coal is directly contradicted by BLM's own December 2011 report prepared as part of the Powder River Basin Coal Review. That report concludes that, by 2030, three additional coal mines will likely be developed in the Ashland/Colstrip region (the proposed Many Stars and Otter Creek mines and a new mine that has yet to be proposed), and two new mines will be developed in the Sheridan/Decker region (the proposed Youngs Creek mine and one that has not yet been proposed). See PRB Report at 3-2 to 3-8. These new developments are in addition to the currently operating coal mines, which the report anticipates will continue through 2030. Id. at 3-7. The PRB Report specifically acknowledges that [f]uture coal mining in the Montana PRB study area is considered highly likely based on the anticipated production rates in relation to the available economic reserves. Id. (3) The report is available at <a href="http://www.blm.gov/wy/st/en/programs/energy/Coal_Resources/PRB_Coal/prb_docs.html">http://www.blm.gov/wy/st/en/programs/energy/Coal_Resources/PRB_Coal/prb_docs.html</a> .	See the Minerals Appendix, Solid Minerals RFD, Coal section. The RFD has been re-evaluated using updated production and coal forecast data. The cited potential mines are either speculative at this time (Many Stars), do not contain federal coal (Otter Creek, Many Stars), or are outside of the planning area (Many Stars, Youngs Creek).
DR-MTDK-MC-13-0108-3	As noted above, the information relevant to coal development potential contained in those previous RMPs is out of date and does not take into account (1) additional exploration information gathered in the intervening years, (2) changes or additions in extractive technology, including underground coal gasification and microbial coal conversion, (3) operating and mining efficiency improvements in existing conventional mining techniques directly affecting the surface mining stripping ratio economic cut-off, and (4) current coal market pricing in determining the economic recoverability of coal. Since those previous RMPs were prepared, significant coal exploration has been conducted by the private sector under the authorization of State of Montana prospecting permits and the federal coal exploration license program. From these efforts, a substantial amount of public information is available, which BLM should use to update its evaluation of coal resources in the planning area.	See the Minerals Appendix, Solid Minerals RFD, Coal section. The RFD has been re-evaluated using updated production and coal forecast data.
DR-MTDK-MC-13-0134-14	While coal leasing decisions are pulled forward from the Big Dry and Powder River RMPs (1996 and 1985), the Reasonable Foreseeable Development scenarios need to be updated as well. The most obvious example of this can be found on pg. 157 of the Minerals Appendix, where it is stated that it is not anticipated that the operators of this mine [Decker] will need to lease additional federal coal, and that subsequently, an RFD is not necessary.	See the Minerals Appendix, Solid Minerals RFD, Coal section. The coal RFD has been updated.
DR-MTDK-	BLM's assumption on marketability of coal from the region is out of date. The RMP relies on a 2009 DOE-EIA Annual Energy Outlook for its assumptions as	See the Minerals Appendix, Solid Minerals RFD, Coal section. The coal production forecast has been updated using the US

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MC-13-0134-22	noted in the Minerals Appendix, pg. 157. Since that overly optimistic outlook for coal markets, U.S. domestic coal markets have undergone a stunning decline. By mid-2012, coal had fallen from almost 50% of electric power generation in 2005 to 36%. A burgeoning natural gas sector with low prices has undercut coal's competitiveness. Also, more than 100 aging coal plants are being retired, many of them being replaced by natural gas, wind, and investments in energy efficiency. The EIA released a report on May 30, 2013, on sales of fossil fuels from federal lands, finding a 1% decline in coal sales.	Energy Information Administration (EIA) Annual Energy Outlook 2013 report.
DR-MTDK-MC-13-0172-1	The Agency states, It is assumed that the Decker Mine will produce at or below the 2008 production levels for the long term. It is not anticipated that the operators of this mine will need to lease additional federal coal reserves; subsequently, an RFD [reasonably foreseeable development] is not necessary. With the new push to ramp up production and increase exports, the BLM's assumptions now appear completely misplaced.	See the Minerals Appendix, Solid Minerals RFD, Coal section. The coal RFD has been updated.
DR-MTDK-MC-13-0191-6	The Western Association of Fish and Wildlife Agencies (WAFWA) Sage-Grouse Guidelines are included in the Fish and Wildlife Appendix starting on pg. FWI -1 .However, it is unclear as to how and under what circumstances these would be applied to proposed actions under any of the alternatives. Also, it is unclear from the Greater Sage-grouse Monitoring section starting on pg. FWI-9 as to when implementation and effectiveness monitoring would be conducted, and what methodology would be employed.	See the Mitigation Measures and Conservation Actions Appendix and GRSG Monitoring Framework appendices for updates.
DR-MTDK-MC-13-0089-58	Considering alternatives to prevent or abate GHG emissions, in particular through enforceable stipulations required in the RMP to attach to subsequent oil and gas leases, is reasonable and prudent.	See the Mitigation Measures and Conservation Actions Appendix for a summary of BMPs that apply across all alternatives to decrease GHG emissions.
DR-MTDK-MC-13-0104-6	BLM has failed to acknowledge that in accordance with valid existing lease rights, many of the identified measures in the BMP Appendix would abrogate such rights.	See the Mitigation Measures and Conservation Actions Appendix, Introduction, explaining application of BMPs.
DR-MTDK-MC-13-0121-21	Please define the term nest dragged. •	See the Mitigation Measures and Conservation Actions Appendix, Introduction, for revisions. The terminology is no longer used.
DR-MTDK-MC-13-0142-27	In addition to the fact that not all of the BMP measures would be achievable or even appropriate mitigation in all cases, BLM has failed to acknowledge that in accordance with valid existing rights, many of the identified measures in the Appendix would abrogate such rights.	See the Mitigation Measures and Conservation Actions Appendix, Introduction, explaining application of BMPs and operating procedures.
DR-	The Greater Sage-grouse BMPs starting on pg. BMP-18 contain many	See the Mitigation Measures and Conservation Actions

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MTDK-MC-13-0191-4	measures of potential conservation benefit to Greater Sage-grouse. However, we found the organization and intended applicability of these measures to be extremely unclear and confusing.	Appendix, Introduction, for revisions.
DR-MTDK-MC-13-0191-5	We recommend the BMP Appendix be reorganized, consolidated, and edited to provide clarity as to which measures would apply to which actions under which circumstances and alternatives. We also recommend that, where possible, measures be edited to provide clear consistency with conservation measures and options included in the COT Report.	See the Mitigation Measures and Conservation Actions Appendix, Introduction, for revisions.
DR-MTDK-MC-13-0171-8	Are there any studies or are studies planned regarding activities within the RMP on wildlife and effects of activities on the land?	See the Monitoring Appendix for planned monitoring activities. Also, studies (i.e. research) are referenced in the document and will continue to be utilized for future management activities.
DR-MTDK-MC-13-0151-3	According to research listed in a document entitled "Consequences of Treating Wyoming's Big Sagebrush to Enhance Wildlife Habitats" published in Rangeland Ecology and Management, 6(5): 440- 455, 2012 it is stated that very hot wildfires actually kill sagebrush. When the undergrowth is not regulated and becomes a mat of dry tinder to feed the fire that can kill sagebrush for 25 to 100 years. Chapter 2, pg. 50, Action 24 states if monitoring data demonstrates livestock use is adversely affecting, sage-grouse or their habitat, change in active use could be considered. Who monitors these?	See the Monitoring Appendix. BLM conducts monitoring throughout the planning area.
DR-MTDK-MC-13-0150-14	There are two maps titled Oil and Gas Leasing Restrictions in Alternative B.	See the Oil and Gas Leasing Restrictions maps for corrections.
DR-MTDK-MC-13-0130-10	The public does not know which rivers were evaluated for wild and scenic river designation and which were deemed ineligible due to not being free-flowing and/or failing to possess outstanding remarkable values. Nor does the public know how those terms (free-flowing and outstandingly remarkable) were defined by BLM. Particular attention should be placed on rivers that have both ecological, fish and wildlife, and historic/cultural values, including the Tongue River. Moreover, BLM's statement that certain river segments that were along the route used by the Corps of Discovery is not an outstandingly remarkable value in the absence of some physical feature • related to the event is misplaced and inconsistent with the WSRA's eligibility criteria and the Agency's own guidance (1982 Interagency Guidelines). The same is true with respect to the pallid sturgeon population. The presence of the endangered species alone, should suffice for an outstandingly remarkable value (spawning habitat is not necessary). Also missing from the Draft RMP is BLM's	See the Special Designation Areas Appendix, Wild and Scenic Rivers section.

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	obligation to consider and analyze how the proposed action may affect potential wild and scenic rivers in the analysis area.	
DR-MTDK-MC-13-0169-25	In order to submit meaningful public comment on the Draft RMP, the BLM must provide the inventory of eligible rivers and explain its methodology for identifying eligible rivers. For example, BLM suggests in the appendix to the Draft RMP (pg. SPE-22) that to be deemed an outstandingly remarkable value it must be exemplary, significant, or be nationally or regionally important. BLM cites no authority to support such a high standard and we are not aware of any in the Wild and Scenic Rivers Act (WSRA) or the 1982 Interagency Guidelines.	See the Special Designation Areas Appendix, Wild and Scenic Rivers section.
DR-MTDK-MC-13-0092-12	From the contents of the MCFO Draft RMP, it is difficult to determine whether prairie dogs currently inhabit the Black-footed Ferret ACEC at all.	See the Special Designations Appendix. The area is no longer recommended for ACEC designation. See Chapter 2, Comparison of Alternatives Table 2-5, Fish, Aquatic and Wildlife Habitat, Including Special Status Species section, Management Common to all Alternatives, for reference to the Black-footed Ferret Working Group. See Chapter 3, Fish, Aquatic and Wildlife Habitat, Including Special Status Species; Special Status Species, Terrestrial section for discussion on black-footed ferret habitat; approximately 455 acres of BLM-administered lands are occupied by active prairie dog towns within the ACEC.
DR-MTDK-MC-13-0108-23	BLM should reconsider maintaining the ACEC designation for the Black-footed Ferret Reintroduction area.	See the Special Designations Appendix. The area is no longer recommended for ACEC designation.
DR-MTDK-MC-13-0174-3	BLM needs to address the potential impacts of climate change on the spread of invasive plants, particularly cheatgrass ( <i>Bromus tectorum</i> ), which may highly alter the quality of habitat by outcompeting native grasses and forbs and causing increased frequency and severity of wildfires, which are detrimental to fire-intolerant sagebrush species. Recent modeling studies have shown the possible expansion of cheatgrass in the Eastern Region of sage-grouse under various climate-change scenarios (Bradley 2009).	See the Vegetation Appendix discussion on research illustrating cheatgrass is not a threat in the northern great plains.
DR-MTDK-MC-13-0190-11	The second part of the statement, regarding waterbodies not be in expected to meet water quality standards after implementation of BMPs for nonpoint sources, is false. In most cases, where nonpoint source pollution is the main cause of impairment, the application of BMPs is expected to lead to achievement of water quality standards	See the Water Appendix, Impaired Waterbodies in the Planning Area, the 303(d) List section for text changes.
DR-	Water Appendix, pg. WAT-26, under heading "Water Quality Categories" You	See the Water Appendix, Impaired Waterbodies in the Planning

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MTDK-MC-13-0190-13	state: "The MDEQ places each waterbody in the Montana's Water Quality Integrated Report (305(b)) in one unique assessment category". However, in Table 2 of the Water Appendix, you cite numerous examples of where DEQ has placed a single waterbody into two categories (e.g. "5, 2B"). You identify Subcategory 4B, a category that Montana for which Montana has no current listings, but you fail to identify subcategories 2A and 2B, for which Montana has multiple current listings.	Area, Water Quality Categories section. The text of the analysis has been changed to include Water Quality Categories 2A and 2B.
DR-MTDK-MC-13-0190-14	Consider replacing the water quality category definitions with the following: 2012 303D/305B Water Quality Categories ID Description 1 - All uses assessed and fully supported. 2A - Available data and/or information indicate that some, but not all of the beneficial uses are supported. 2B - Available data and/or information indicate that a water quality standard is exceeded due to an apparent natural source in the absence of any identified anthropogenic sources. 3 - Insufficient data to assess any use. 4A - All TMDLs needed have been completed. 4C - TMDLs are not required; no pollutant-related use impairment identified. 5 - One or more uses are impaired and a TMDL is required.	See the Water Appendix, Impaired Waterbodies in the Planning Area, Water Quality Categories section for text changes.
DR-MTDK-MC-13-0190-15	Water Appendix, pg. WAT-26. You have used the term "source" where you should have used the term "cause," and vice/versa. The term "possible cause" should be changed to "probable cause"	See the Water Appendix, Impaired Waterbodies in the Planning Area, Impairment Causes; and Possible Sources of Impairment sections for text changes.
DR-MTDK-MC-13-0105-5	What is the impaired status of Otter Creek? Also, the Tongue River is above the salinity standards set by the numeric water quality standards.	See the Water Appendix. Otter Creek and the Tongue River are listed in the table showing impaired waterbodies.
DR-MTDK-MC-13-0089-30	At the Rosebud Mine, coal mining is causing significant degradation of water quality, and is contributing to water quality violations of already impaired streams.	See the Water Appendix. The Rosebud Mine is a probable source of impairment to East Fork Armells Creek. The MDEQ includes coal mining as a probable source of impairment to East Fork Armells Creek for the section reaching from Colstrip to the mouth and surface mining for the section reaching from the headwaters to Colstrip. These impaired reaches are listed in the Water Appendix; see the table showing the list of impaired streams and rivers in the planning area. Also, see Chapter 4, Water Resources, Impacts Common to all Alternatives section and alternatives A through E for the potential impacts from oil, gas, and coal development on water resources.
DR-MTDK-MC-13-	Explain how (using what sources) and when Greater Sage-grouse habitat and management objectives would be developed for Category M and C livestock grazing allotments.	Site specific objectives will be developed when a site-specific action is proposed.

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0191-13		
DR-MTDK-MC-13-0169-13	In the Draft RMP, BLM references a 2006 study but fails to include it in the RMP.	The 2006 study referenced in the RMP is available on-line at <a href="http://www.blm.gov/mt/st/en/fo/miles_city_field_office/rmp/docs.html">http://www.blm.gov/mt/st/en/fo/miles_city_field_office/rmp/docs.html</a> .
DR-MTDK-MC-13-0191-16	Table 2-1, Greater Sage-grouse RA Action 4, Alternative D. We are unsure what is meant by "Surface disturbing activities (including ROWs) would be allowed subject to timing and distance (60 days/200 meters). "	The 60 days means proposed surface disturbing activities will not take place during a 60-day period identified by BLM (timing). The 200 meters means a proposed project could be moved from the proposed location up to 200 meters (distance). Per 43 Code of Federal Regulations (CFR) 3101.1-2 (pertaining to fluid minerals), conditions of approval are deemed consistent with lease rights provided they do not require relocation of proposed operations by more than 200 meters, mandate that operations be sited off the leasehold (i.e. no surface occupancy), or prohibit new surface-disturbing activities for a period of more than 60 days in a lease year.
DR-MTDK-MC-13-0196-5	It is unclear whether the 792,000 acres of protection priority habitat areas for sage-grouse are included in the 1,403,000 oil and gas acres under Alternative E (pg. 2-41 - 2-42, Table 2-1).	The acreages are included as part of the oil and gas acres.
DR-MTDK-MC-13-0121-1	BLM has failed to explain its rationale for selecting the Preferred Alternative.	See Chapter 2, Alternatives Considered in Detail section. The Draft RMP/EIS did not "select" a preferred alternative, rather, it identified a preferred alternative based on CEQ regulations. The alternative which contains the most desired combination of potential planning decisions, and meets the multiple use and sustained yield mandates of Section 103(c) of FLPMA (43 U.S.C. 1702(c)), is identified as the preferred alternative.
DR-MTDK-MC-13-0146-11	Who is responsible for invasive species in the exclosures full of invasive noxious weeds? If Leafy Spurge or Canada Thistle is sprayed and the trees die, is the Weed Board responsible?	The BLM is responsible and prioritizes treatment areas by those areas of public access, riparian areas, emergency stabilization and rehab areas and special status species habitat.
DR-MTDK-MC-13-0146-19	Pg. 2-90 and 2-91 Who fences out livestock? Who maintains these fenced exclosures? Who takes care of noxious weeds within these exclosures?	The BLM prioritizes treatment areas by those areas of public access, riparian areas, emergency stabilization and rehabilitation areas, and special status species habitat. Resource objectives determine when exclosures are treated.
DR-MTDK-MC-13-	BLM's claims assume that restrictions on leases would preclude or limit future development, reduce lease values, and/or drive drilling activity to non-federal lands. See id. This view is flawed in several respects. First, restrictions on	The BLM recognizes that cost-effective methane reductions depend on well-specific characteristics. Oil and gas operators are aware of these characteristics and can best identify when

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0089-14	leases requiring reductions in methane emissions could actually lead to higher profits and valuations for operators on BLM lands, since many commercially available technologies to capture methane have been shown to have rapid paybacks and yield substantial profits thereafter. Further, restrictions on leases that require methane emissions reductions could plausibly spur state oil and gas commissions and state land offices to follow BLM's lead to reduce methane waste, increase royalty payments and take action on climate change by adopting comparable lease restrictions to minimize methane emissions.	methane emission reductions would increase profitability and valuations. State oil and gas commissions and state land offices are also well-prepared to identify methods to reduce methane waste and increase royalty payments.
DR-MTDK-MC-13-0171-1	Have there been any soils baseline studies throughout the RMP areas in regarding the different soil composition and communities and how will surface disturbances be managed?	The BLM uses soils information provided by the USDS-NCRS. They provide information, e.g. erodibility, on the different soil associations. For management of Soils, see Chapter 2, Comparison of Alternatives Table 2-5, Soils section.
DR-MTDK-MC-13-0146-34	The citation for Mosley et al. is incorrect. Mosley is misspelled and the publication date is 1997 not 1999.	The citation and spelling are correct. The December 1999 date refers to the internet edition publication date.
DR-MTDK-MC-13-0051-1	The Lewis and Clark Trail. The no action alternative lists trail acres as 16,350 and the action alternatives (other than Alternative D) list 14,499 acres. Please demonstrate in the Proposed EIS the location of the 1851 acres of trail that will no longer be designated as SRMA and the rationale for this proposed reduction.	The difference in acreage numbers is due to the technology available today (GIS) that BLM was lacking when the original acres were visually estimated.
DR-MTDK-MC-13-0051-3	Chapter 2 Alternatives pg. 2-93 Action 6: Please clarify where and why the Lewis and Clark Trail SRMA boundary is proposed to be changed, resulting in a reduction from current SRMA acres of 16,350 to 14,499 acres.	The difference in acreage numbers is due to the technology available today (GIS) that BLM was lacking when the original acres were visually estimated.
DR-MTDK-MC-13-0080-1	Map 41 Land Pattern Adjust and Access. We do not agree to this designation for part of our ranch in the Medium priority area for access. Why is it your goal to acquire public land access to our ranch?	The map is a generalized graphic display of access goals to provide public access to larger tracts of BLM administered land. Any actual access acquisition proposal would be pursued on a case-by-case basis, and include an environmental analysis, with public notification and comment. Also, see the Land Pattern Adjustment and Access Map (14) for changes.
DR-MTDK-MC-13-0166-1	On Map 41, the Land Pattern Adjustment and Access map, a portion of the Ashland Ranger District near the southeast corner is shown as a medium consideration for access. Please clarify the rationale for identifying and including National Forest System lands.	The map is a generalized graphic display of access goals to provide public access to larger tracts of BLM administered land. Any actual access acquisition proposal would be pursued on a case-by-case basis, and include an environmental analysis, with public notification and comment. Also, see the Land Pattern Adjustment and Access Map (14) for changes.
DR-MTDK-	Maps 61-67, one of which shows continuous blocks of BLM lands, were missing from the Draft RMP.	The maps referenced are available electronically on the RMP CD and the RMP webpage.

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MC-13-0176-1		
DR-MTDK-MC-13-0105-3	The BLM should look at the Otter Creek development as well as the Tongue River Railroad in the RMP.	The proposed Otter Creek Mine is in the early stages of seeking State and Federal mine permits. BLM considers the proposed Otter Creek Mine to be speculative at this time. Also, there is no federal coal included in the proposed Otter Creek Mine. All future coal applications, including for Otter Creek, would be considered on a case-by-case basis. NEPA review would be conducted at that time. See Chapter 4, Lands and Realty, Assumptions and Methodology section. The Tongue River Railroad is analyzed in the RMP via the assumption for a railroad.
DR-MTDK-MC-13-0130-12	The BLM does mention that the agency will consider the cumulative impacts of those pertaining to the Tongue River Railroad project. Yet that one sentence is the only time in the entire document that the Tongue River Railroad is referred to. The proposed Otter Creek coal mine, whose owners are seeking a permit, is not mentioned once in the document. BLM owns surface in the Otter Creek coal tracts. Impacts from this development on cultural and historic resources, vegetation, wildlife and water need to be examined.	The proposed Otter Creek Mine is in the early stages of seeking State and Federal mine permits. BLM considers the proposed Otter Creek Mine to be speculative at this time. Also, there is no Federal coal in the proposed Otter Creek Mine.
DR-MTDK-MC-13-0130-17	Studies show that discharges of ground water high in sodium bicarbonate from coal bed methane wells, the same water that would be discharged from the Otter Creek coal mine, are likely to adversely impact aquatic life, including young fish. Impacts on fisheries and aquatic life must be fully analyzed in the draft EIS.	The proposed Otter Creek Mine is in the early stages of seeking State and Federal mine permits. BLM considers the proposed Otter Creek Mine to be speculative at this time. Also, there is no Federal coal in the proposed Otter Creek Mine.
DR-MTDK-MC-13-0089-43	MCFO should consider adoption of a performance standard-based approach which would establish maximum leak and vent rates for oil and gas activity.	The USEPA and MDEQ require emission controls that reduce GHG emissions, as described in Chapter 3, Air Resources and Climate, Climate Change, National Action to Reduce GHGs section and the Air Resources and Climate Appendix, Miles City Field Office Air Resource Management Plan: Adaptive Management Strategy for Oil and Gas Resources, section 1.5.2.
DR-MTDK-MC-13-0159-1	Map 17 – Closed to Grazing – Calypso SRMA. Will the fence be woven wire to make it sheep tight?	This is an existing fence. No new fence would be constructed.
DR-MTDK-MC-13-0126-13	Chapter 1, pg. 5, Issue 2. Three of the sensitive plant species in the MCFO are considered globally secure so they are under no "risk of future federal listing under the ESA."	Though globally stable, the BLM manages species if rare in Montana, for species diversity for the state.

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DR-MTDK-MC-13-0090-6	The Draft RMP is not sufficient in conveying to the public a clear picture of what roads and trails are proposed to be closed or remain open. The maps associated with the Draft RMP do not indicate road and trail numbers which are necessary for the public to provide substantive comments on specific roads and trails.	Travel Management Planning, which includes road and trail numbers, will be conducted during implementation planning. Following completion of the RMP, a transportation plan will be developed with the public that establishes a comprehensive designated route system for all areas where the RMP Record of Decision has determined OHV use is limited to existing roads and trails.
DR-MTDK-MC-13-0164-1	Travel management. Upon inspection of the maps the BLM provided of the areas impacted by the plan we found that the majority of the roads and areas indicated on the map lack specific locations or, in some cases, anything that made them even remotely distinguishable from one another.	Travel Management Planning, which includes road and trail numbers, will be conducted during implementation planning. Following completion of the RMP, a transportation plan will be developed with the public that establishes a comprehensive designated route system for all areas where the RMP Record of Decision has determined OHV use is limited to existing roads and trails.
DR-MTDK-MC-13-0125-7	We request an assessment of each and all motorized routes in the RMP, and their cumulative effect on wildlife displacement, noxious weed spread, and other resource damage.	Travel Management Planning, which includes site-specific roads and trails, will be conducted during implementation planning. Following completion of the RMP, a transportation plan will be developed with the public that establishes a comprehensive designated route system for all areas where the RMP Record of Decision has determined OHV use is limited to existing roads and trails.
DR-MTDK-MC-13-0134-20	Climate change is also a concern that the BLM needs to take a hard look at. According to the Billings Gazette, carbon dioxide emissions rose by more than 11 percent in Montana last decade as the state continued to have one of the highest per capita greenhouse gas emission rates in the country. This is extremely significant since the carbon dioxide levels in the atmosphere recently surpassed 400 parts per million. The impacts from oil and gas development alone will accelerate climate change, as will the cumulative impacts from the other proposed developments in the area such as coal mining, a tar sands pipeline, and a coal-hauling railroad. The BLM is required to study and address the impacts of climate change. A simple solution would be putting some of the BLM minerals off-limits to leasing. The preferred alternative does not do this.	When compared to the No-Action Alternative (A), the PRMP/FEIS Proposed Alternative (E) would restrict oil and gas mineral estate available for leasing and thereby decrease GHG emissions.
DR-MTDK-MC-13-0135-2	We recommend that the BLM identify areas that may be particularly suitable for the development of a new shooting range, or areas that could accommodate more shooters even though they may be more informal settings.	With the exception that the “discharge or use of firearm, other weapons, or fireworks” is prohibited on developed recreation sites and areas, unless otherwise authorized, 43 CFR 8365.2-5 (a), shooting and possession and use of firearms are allowed on public lands managed by the BLM. The BLM’s policy prohibits the agency from directly operating shooting <i>ranges</i> , or from

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		issuing new leases of public lands for shooting ranges. New shooting ranges cannot be authorized by any type of lease or other land use authorization that does not transfer title to the applicant.
DR-MTDK-MC-13-0121-32	Pg. 3-76 “Throughout Sage-Grouse Management Zone 1, land ownership is predominantly private (70 percent). Ownership on the remaining range of the greater sage-grouse in Sage-Grouse Management Zone 1 is 68 percent private and 13 percent state or other federal ownership (not including the Fort Peck and Fort Belknap Indian Reservations), with 83 percent of the federal lands in the range of the greater sage-grouse in Management Zone 1 managed by the BLM. COMMENT: This statement is unclear. Does this mean that 83 percent of the 13 percent of federal ownership in Management Zone 1 is within the remaining range of the greater sage-grouse?”	Yes, that is correct. See Chapter 3, Fish, Aquatic and Wildlife Habitat, Including Special Status Species; Special Status Species (Aquatics, Avian and Terrestrial) section for revisions.
DR-MTDK-MC-13-0171-2	Have there been any baseline studies in any areas of the RMP of the vegetative community? BLM needs to either start managing all of the ACECs that have been designated, or get rid of them.	Yes. Rangeland Vegetation monitoring studies have been established across the MCFO since the 1960s. See the Special Designation Areas Appendix. The Black-footed Ferret, Plover and Yonkee areas are no longer recommended for ACEC designation.