

BLM Miles City RMP Scoping Comment Form



Individual respondents may request confidentiality. Individuals who wish to withhold their name or street address from public review or from disclosure under the Freedom of Information Act must state this prominently at the beginning of their written comment. Such requests will be honored to the extent allowed by law. All submissions from organizations and businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, will be available for public inspection in their entirety. BLM will not accept anonymous comments.

Name: Pat Tucker

Organization (if applicable): _____

Address: 500 Jorgy Way

City, State, Zip: Hamilton, MT 59840

Email address: wildsent@bitterroot.net

Please submit your comments by **March 5, 2005.**

Please choose a category (or categories) for **each** of your comments.

- | | | |
|---------------------|--------------------------|---------------------------------|
| Air/Climate | Livestock Grazing | Special Management Designations |
| Cultural | Native American Concerns | Vegetation |
| Fire | Off-Highway Vehicles | Visual |
| Fish | Paleontology | Water |
| Fluid Minerals | Recreation | Wilderness |
| Forestry | Socioeconomics | Wildlife |
| Hazardous Materials | Soils | |
| Lands and Realty | Solid Minerals | Planning Criteria |
| | | Other |

Please check the box that applies:

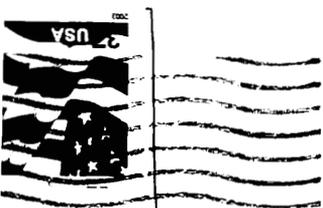
- Use email only to update me on project progress and the RMP.
- Please keep me on your mailing list for hard-copy information.
- I have no further interest and do not want to receive RMP mailings.

1. Category: Fluid Minerals concerned about coal bed methane development an it's impacts on ground & surface water quality

2. Category:



Miles City RMP Comments
P.O. Box 219
Miles City, Montana 59301-0219



300 Jerry
Hamilton, MT 59840

3. Category:

4. Category:



"MARK HEIDI CARLSTROM "
<mhws@msn.com>
02/08/2005 07:35 AM

To <mary_bloom@blm.gov>
cc
bcc
Subject Comments On RMP

(Dear Ms. Bloom: Your website is not available on this day the newspaper article came out. Please acknowledge that the following comments have been submitted to the right party.)

DEAR BLM:

Thank you for the opportunity to comment on the RMP.

I urge the BLM to limit OHV's to primary access roads. Obliterate, block, or otherwise effectively eliminate unnecessary roads and trails. Many people own OHV's and enough of them create major problems by driving wherever their machines will go. We simply cannot have people driving all over a spiderweb of roads, trails, and open areas. This negatively impacts natural resources, our shrinking open space, and those of us who like to use our legs and be free of mechanical influences.

I urge the BLM to establish designated or central camping areas, with blocks of habitat designated as no-camp areas, especially during hunting seasons. I walked into a favorite block of prime BLM mule deer habitat only to find a hunting camp where there was no road and where I'd never seen a person before. There was more human sign than deer sign in the area. These people could have camped at Moorhead (sp) and left the larger area alone for quality hunting.

I urge the BLM to use some of its resources to hire and equip more enforcement staff. I know a few people who work for the BLM. I know the BLM has a large number of staff. I know that some BLM staffers don't do a lot. I know that BLM employees make high wages. Convert some of these resources to on-the-ground enforcement functions.

Thank you.

Mark Carlstrom
3139 Poly Drive
Billings MT 59102

mhws@msn.com

Comments by David Squires

29 Broken Bow Lane Miles City 59301

Category: Recreation (commercial)

Comment: In eastern Montana the majority of the land base is private and BLM-administered lands only comprise about 10% of the land base. Of the 3.2 million acres of BLM administered lands in eastern Montana, approximately one million acres are not legally accessible. The accessible BLM acres are important for big game and upland bird hunting. For many hunters, access to BLM land is important to realizing a satisfying experience. However, there are too many incidents where commercial outfitters (hunting) or their guides have illegally posted accessible public land and confronted hunters with the intent to bluff them off legally accessible public lands. To reduce the incidence of these conflicts BLM needs to consider an alternative that precludes commercial outfitting for hunting from legally accessible public lands. This alternative should also include any public lands where legal access is acquired in the future.

Category: Recreation

Comment: High priority should be placed on enhancing public access through signing public land boundaries along County and other public roads and navigable waterways. This should be a cooperative effort with DNRC and MFWP.

Category: Motorized Access:

Comment: There is the need to equalize motorized access opportunities between commercial outfitting (hunting) and nonguided public hunters. The fractured landownership patterns in eastern Montana create many instances where roads on legally accessible BLM land originate on private land. This gives outfitters an unfair advantage for using motorized vehicles. The RMP should consider a travel planning criteria that prohibits outfitters driving on roads on public land if the public does not have similar access to these roads.

Category: OHV

Comment: The RMP should include criteria that allows development of intensive OHV opportunities near major communities where OHV activities do not significantly interfere with other valid uses on public land and where OHV activities would not adversely affect the biophysical and social environment. Criteria should allow for on trail use, whether existing or constructed. If off-trail is allowed, it should be limited to a small area and contingent upon partnerships with private user groups to assist BLM in managing impacts.

BU70017



"Montana Petroleum Association" <mpa@mcn.net>

To <mbloom@blm.gov>

cc

03/05/2005 12:30 PM

bcc

Subject Scoping comments Miles City Field Office RMP

March 5, 2005

Ms. Mary Bloom
Bureau of Land Management
Miles City Field Office
P.O. Box 219
Miles City, Montana 59301-0219

Re: Miles City Field Office Resource Management Plan

Dear Mary Bloom:

The Montana Petroleum Association (MPA), a non-profit trade association representing oil and gas exploration and production operators, pipeline and refining companies, and consultants and service providers to the oil and gas industry in Montana, respectfully submits the following comments regarding the Miles City Field Office Resource Management Plan scoping. Also, MPA is a member of Public Lands Advocacy and endorses the comments submitted by PLA executive director Claire Moseley. Additionally MPA has reviewed the comments submitted by MPA member company Fidelity Exploration & Production Company, and MPA is in full concurrence with G. Bruce Williams observations and recommendations in his document of March 4, 2005.

Cumulative impacts analyses is the hook on which oil and gas detractors hang their objections to analyses done by public lands agencies. And, "worst case scenarios" as used in impact analyses that do not reflect mitigating, standard stipulations provide fodder for doom and gloom predictions from opponents. Hence, MPA recommends BLM use a process of defining cumulative impacts through acceptable levels of surface disturbance rather than the number of wells in then planning area. This "net effects" allows for acreage to be returned to an unoccupied inventory should an exploratory well be unsuccessful or when an uneconomic well has been plugged, abandoned and reclaimed. Additional wells can then be drilled without exceeding the levels of surface disturbance analyzed. Additionally mitigation measures should be incorporated directly into the effects analysis to show that oil and gas activities are mitigated and are actually compatible with other resource uses.

Domestic energy needs and the roll of the oil and gas resources in the area under analysis in Miles City Field Office RMP should be discussed. However, the discussion should reflect that any region's contribution to the energy supply of the nation should not be viewed in isolation. The supply potentially provided is part of a mix of energy sources from throughout the region and the U.S. The rationale that oil and gas development should not be permitted because it will only provide two days of U.S. natural gas consumption should be defused.

As an association that interacts with state and local elected officials, MPA regularly shares with officials the oil and gas production tax revenue potential from federal lands/minerals for funding their infrastructure and school financing needs. The socio-economic analysis of the Miles City Field Office Resource Management Plan should include the state and local severance tax potential. (In Montana they are called oil and gas production taxes because they are shared between the state and local governments unlike Wyoming that has a state severance tax and separate, locally assessed ad valorem taxes on production.) Also, the potential of federal royalties returned to the state should be included in the analysis.

Thank you for the opportunity to comment. MPA and its members are more than willing to provide

B070017

information and otherwise contribute to a useful, accurate management plan for this extremely important area in Montana for domestic energy supply.

Sincerely,

Gail Abercrombie
Executive Director
Montana Petroleum Association
P. O. Box 1186
Helena, MT 59624
(406) 442-7582
mpa@mcn.net

cc: Claire Moseley, Public Lands Advocacy
MPA Board of Directors

entered

B070018



"Karen Brown"
<kmbrown@qwest.net>
03/07/2005 09:53 AM

To mbloom@blm.gov
cc
bcc
Subject Comments on Miles City RMP - Access Denied on Saturday

On Saturday, March 5, I got online and attempted to submit four different comments on the Miles City RMP. I made more than a dozen attempts and each attempt was met with a return message saying:

"Server Error in '/CmntSignUp' Application" – the next line on the form identified the error as:
Line 1: Incorrect syntax near 's'. Unclosed quotation mark before the character string ').

I just contacted the Miles City BLM office and they told me that I should e-mail my comments to you. Additionally, I want to be assured that they will be included in the Scoping Comments and that the CBNGA is of record and has standing in the RMP.

Please contact me if there is a problem. I would be glad to fax the error messages I received as well as the completed comment forms – for documentation of my attempts to submit comments. There are four comments below.

Karen M. Brown
Coalbed Natural Gas Alliance – Coordinator
6464 Umber Circle
Arvada, CO 80007-6839
303-467-9200 Work Phone
303-467-9208 Fax Number
www.cbnga.com

COMMENT 1 – TOPIC – OTHER:

The Planning Criteria and Statement of Purpose should include that the resulting plan will take into account the President's proposed energy plan, the Report of the National Energy Policy Development Group, national energy policy, national energy needs and the fact that energy consumption exceeds production in the United States. A part of what needs to be considered in any plan includes how critical such development is to securing a more energy independent status in the United States. During the Presidential campaign, all candidates (and especially Bush and Kerry) emphasized the need to make the United States more self-reliant for its future energy needs. Such an objective can only be achieved by aggressively developing resources including those in the Miles City RMP and throughout the US.

COMMENT 2 – TOPIC – WATER:

A toolbox approach to water management is recommended for the Miles City RMP for all energy development and specifically coalbed natural gas development. The general concept of the water management toolbox is to allow all involved to choose from the entire spectrum of water management techniques including but not limited to using water for managed irrigation, water for livestock and fowl, lined and unlined ponds, discharge to streams and rivers, injection, reinjection, treatment, use of water for spraying on roads to reduce dust, drinking and domestic water uses (if viable), ponds for farming fish, etc. In this fashion, the water management technique becomes site-specific and addresses the water quality issues, the needs and wants of the surface owner and the economics of the play.

COMMENT 3 – TOPIC – OTHER:

An issue across the United States is the fact that energy costs (and specifically natural gas) are increasing dramatically and are projected to increase in the next 3 to 5 years or longer. The key reason for this

increase is due to an increase in demand over the existing supply. The average consumer may be able to stand the increases because they have more discretionary money available to them. However, low-income folks in Montana and across the United States have far less discretionary money and are severely challenged in meeting their home energy needs on a day to day basis. Every federal agency dealing with energy including the Miles City BLM needs to take into account the fact that the United States needs energy – and that the larger the supplies of energy, generally speaking the lower the costs. Such lower costs help low-income families in Montana, the Rocky Mountain region and the United States as well as the general economy in each of those regions.

COMMENT 4 – TOPIC – OTHER:

The economy of Montana will be significantly impacted by whatever guidelines are set-forth in the Miles City RMP. Significant jobs and revenue will result from development that balances the environment, economics, operator and surface owner needs, and community needs. The jobs and revenue created through the development of energy throughout the Miles City RMP will lead to enhanced funding for the school system at the local, regional and state level for K-12 as well as the university system. The additional dollars will provide for an enhanced infrastructure including roads, buildings and more.

BLM Miles City Field Office RMP Scoping
March 3, 2005

Recreation

1. Access to Federal land needs to be a Field Office priority
2. Annual Signing Projects and Maintenance in concert with DNRC & FWP should continue annually
3. Commercial Outfitting should be studied for elimination on accessible tracts of BLM in the MCFO. Permits could/should be phased out when they expire.
4. Travel Management Planning needs to be continued throughout all the MCFO
5. Temporary Easements/Row's need to be a tool that BLM can use to secure access to public lands
6. Partnerships with other agencies and organizations to address access issues are critical to success and needs to be assigned a high MCFO priority
7. BLM cooperation with State agencies needs to be assigned a high priority in MCFO and the RMP
8. Non-traditional access agreements need to be utilized by BLM: horse/foot travel only, seasonal access, temporary access agreements (3-5yrs).
9. Off road travel problems, possibly compounded by additional "roads/trails" w/ CBNG

*Comments submitted 3/3/05
@ Miles City scoping meeting*

*Dwayne Andrews
dandrews@mt.gov*

*1211 North Custer
Miles City, MT 59301*

B-070002

Scoping comment during 3/10/15 RAC mtg:

Identify roads that are needed - remain permanently open. Others should be closed & rehabbed after ~~the~~ project concludes. This is to help protect wildlife habitat.

March 3, 2005

Colby Branch
P.O. Box 2529
Billings, MT 59101

Mary Bloom
Miles City BLM Field Office
111 Garryowen Rd
Miles City, MT 59301

Re: RMP Scoping Comments

TRANSMITTED BY FACSIMILE TO: 406.233.2886

Dear Mary:

I have the following comments regarding the development of your new Resource Management Plan:

1. Fluid Minerals

I am concerned with regard to the many restrictions on oil and gas drilling on public lands. Over the years, regulatory requirements, lease stipulations and siting/timing limitations have gradually increased to the point that many BLM lands purportedly open to drilling really are not. It seems that each new Resource Management Plan imposes only more restrictions.

This country has a moral obligation to our young men and women, especially those who face the prospect of overseas military service, to make a reasonable attempt to produce more of our own energy. We need to reduce our dependency on violent, unpredictable foreign regimes, and to slow the transfer of wealth to those who would use it to attack our country.

In your EIS process, you should closely examine all drilling restrictions with an eye to reducing redundancy and streamlining the process. At the very least, your new Resource Management Plan should not impose any new restriction in the absence of a good reason.

2. Recreation

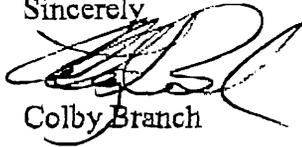
The BLM's recent restrictions on off-road travel have greatly reduced recreational opportunities on public lands. These restrictions come at the same time as demand for outdoor recreation is increasing and access to federal lands is decreasing.

Off-roading is a very important family activity. It is an activity that the whole family can enjoy together. Mom can look at the pretty scenery, while Junior sees how much air he can get. Wholesome family activities like this keep kids from trying to satisfy their need for adventure and excitement on the city streets.

In developing your new Resource Management Plan, you should closely examine the possibility of increasing access for off-road recreation through: (1) establishment of additional off-road areas such as the Shepard Ah-Nei, and (2) establishment of designated trail systems.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read 'Colby Branch', written over a horizontal line.

Colby Branch

Jon W. Seekins

From: Don & Jennifer Cole [donjennifercole@rangeweb.net]
Sent: Thursday, March 03, 2005 9:45 PM
To: jseekins@milescityrmp.com
Cc: Jody Courtney; Lane Pilster
Subject: RMP Commentt

Hello Jon,

I tried numerous times to submit these comments on line and errors kept showing up. So I thought I would submit the Grazing District comments directly to you.

Missouri River Basin Cooperative State Grazing District

Comments for the RMP Scoping

Category: Fire Management

We would like to keep the new standards and guidelines set by the BLM. Keep the status for use of big equipment. If fires are left uncontrolled at night it is very difficult to get the situation under control the next day. Therefore, only fighting the fire from 9 am to 5 pm is very ineffective. There needs to be no set hours to keep a critical fire under control.

Category: Permite Notification

When the BLM has leased to an outfitter, the permittee should be notified whenever the outfitter plans to be on that land.

Category: Off-Highway Vehicles

We would like to keep the current status, which allows the permittees to drive-off-road to conduct livestock business. Activities like checking grass conditions, maintaining fence, delivering supplements, moving livestock and checking water.

Category: Planning Criteria

The planning area will encompass a very large area. There needs to be a special provision in for agriculture and natural resources. A blanket policy will not properly manage the differences in soil type, climate, vegetation and differences in general grazing practices. What is a standard and an acceptable practice in one area may not be appropriate in another. We would like to see guidelines set on a case-by-case basis, keeping the individual permittees and specific location in mind.

Category: Vegetation

Need to supply more funding for noxious weeds and salt cedar. The use of alternative plans working with the permittee using animals vs chemical.

If you have any questions please contact me. 406-828-4440 email donjennifercole@rangeweb.net
Thank you for giving us the opportunity to submit our comments.

5/9/2005

Sincerely,
Jennifer Cole