

## Chapter 4.0: Consultation and Coordination

### 4.1 Public Notices, External and Internal Input

BLM consulted other resource management agencies as well as its partners in fire suppression to determine the appropriate approach to a fire management update.

Extensive public and internal input was also invited through letters to the public and meetings with BLM Field Office staff. Each Field Office identified a contact for this planning effort, and the project leader scheduled interdisciplinary team meetings with staff from each Field Office. During these meetings, Field Office staffs identified preliminary issues and special areas of concern; discussed appropriate methods of consultation and coordination; and discussed preliminary expectations for alternatives and impacts. These efforts are summarized below.

### 4.2 Consultation and Coordination

A **Federal Register Notice of Intent** to prepare a NEPA document and RMP amendments related to fire management planning was published (9/98).

**Letters were sent to 115 federal, state, and local agencies** to announce the fire management planning process and offering to coordinate as appropriate (10/21/98).

**Agencies were contacted** to identify issues and gather information. These included Northern Rockies Coordinating Representatives (3/18, 2/4/98), Forest Service (4/7/98), Montana Department of Fish, Wildlife, and Parks (MDFW&P) (4/16/98), Montana Fire Wardens (5/1-3/98), DNRC (5/1-3/98), Western States Air Resource Council (5/13-15/98), MDFW&P (5/18/98), and DNRC (5/18/98)

The BLM met with Black Hills National Forest to discuss opportunities for BLM/FS coordination around the South Dakota Exemption Area (11/1/00).

Consultation with the USFWS on the Biological Assessment (BA) indicated that a finding of May Affect and Is Likely to Adversely Affect was appropriate for some species. Formal consultation with the service was initiated on December 20, 2002.

**5,067 letters were sent to the general public** announcing the fire management planning process and asking for issues, concerns, and a response from those who want to stay on mailing list (10/98).

**The MT congressional staffs** were briefed about fire management planning (9/9/98). Briefings and materials were provided to the offices of the Congressional delegation (8/13/01).

**Staffs of the SD Congressional delegation** were briefed (8/16/01).

**Letter sent to 48 fire wardens** announcing the fire management planning process and asking for issues and concerns (10/30/98).

**Letters sent to County Commissioners** from each Field Office Manager announced fire management planning and offered to provide a briefing (10/98). Lewistown FO briefed Petroleum County Commissioners (12/2/98), Chouteau County Commissioners (12/7/98), Fergus County Commissioners (12/8/98), and Blaine County Commissioners (1/12/99). Lewistown FO sent letters, maps, and briefing statements to Hill County and Judith Basin County (12/98)

**Responses from initial letters and contacts** include: general public (524), agencies (47), counties (1), fire wardens (17), and county commissioners (6) (12/15/98). These people and agencies requested to be on the mailing list.

**Field Office interdisciplinary team meetings** with field specialists and managers included Billings (4/20/98, 5/28,29/02), SD (4/27/98, 6/17,18/02), Butte and Missoula (5/7/98), Dillon (5/26/98, 7/22/02), Lewistown, Great Falls, Malta (5/28/98, 6/10/02), Miles City, ND (6/10/98, 5/30,31/02), Missoula (6/3-5/02), Butte (6/6/02),

**Communities at risk** from wildland fire were identified for Montana and South Dakota, and the lists were sent to Montana DNRC (3/14/01) and South Dakota Department of Forestry (3/08/01) for coordination with other agencies. A final list of communities at risk in SD, ND, and MT was compiled and sent to each Field Office and the National Interagency Fire Center (NIFC) (3/21/01).

BLM Fire Management Officers (FMOs) completed fire risk assessments for Montana/Dakotas (4/9-13/01)

**The Montana Association of Counties** was briefed at the Mid-Winter Meeting in Helena Montana. Field Manager Tim Murphy discussed “The Federal Wildland Fire Policy and the Eastern Montana Experience” (2/24/99).

**A fuels reduction coordination meeting** in Lead, South Dakota included Interdisciplinary (ID) team members, representatives from BLM, Black Hills Power and Light, NIFC, the logging industry, SDRC, Lead Fire Dept., Homestake Mining Company, Lead Fire Chief, Lawrence County Fire Board, State of South Dakota Forestry, Pope and Talbot (10/31/00).

Fire management officers conducted fire risk assessment for Montana/Dakotas (4/9-13/01).

**Internal BLM management briefings and meetings** included BLM post fire conference (11/4/98), State Management Team (SMT) (12/15/98, 1/23/01, 7/26/01, 4/24/02, 5/02/02), spring Fire Operations Meeting (5/12/99), and State Director Briefing (3/17/03).

ID team developed preliminary guidelines for managing wildland fire and prescribed burning in sagebrush and other wildlife habitats (2/8/01).

Guidelines for identifying fuels reduction projects were sent to each Field Office (5/31/01).

The SMT endorsed additional meetings with field office resource specialists to comply with IM-2002-034 (4/24/02).

**The Preliminary EA and Fire Management Plans** were sent to each Field Office for internal review (6/8/01). Review comments were due (7/2/01). Briefing packages were sent to each Field Office (7/31/01). A conference call with Field Offices discussed the status and process for public review (8/2/01).

**The Fire Management Plan/EA** was sent to the public (8/10/01). Copies were distributed to the Lawrence County Fire Advisory Board (8/14/01). The Billings Gazette published a Notice of Availability (8/15/01). A Great Falls Tribune story and Notice of Availability of the Fire Management Plan was run (8/27/01). The original comment period ended (9/17/01). Cards were sent to mailing list explaining the comment period extension (9/21/01). The extended comment period ended (11/16/01).

### 4.3 Initial Public Input

Through letters and contacts with the public, agencies, and state and local officials, BLM asked for initial comments and concerns by November 30, 1998. Comments from the public included the following:

- Concerns about fuels build-up and suggestions for more timber sales
- Prescribed fire is a good management tool that should be used to manage ecosystems
- Prescribed burns should be used more often to control

fuels build-up and pine seedlings

- BLM should pay local fire departments to fight fires
- Dams should be fixed to provide a source of water to fight fires
- Farmers and ranchers should be allowed to fight fires
- BLM should provide more equipment

County commissioners and fire wardens expressed general interest in fire management planning and specific interest in fuels build-up around Lead, South Dakota.

### 4.4 Public Comments on the Fire Management Plan/Plan Amendment Environmental Assessment

During the August 2001 comment period following the release of the EA, the National Wildlife Federation requested a 60-day extension of the comment period in order to adequately review the Plan and contact specialists who might provide additional insight through comments. The Acting Associate State Director granted the extension and sent a card to those on the mailing list, explaining the extension and establishing the new deadline for submitting comments (November 16, 2001).

Fourteen letters were received by November 16. An additional 19 letters were received after the end of the comment period. Five letters were from agencies, six were from interest groups/organizations, and 22 were from individuals. All comments received have been considered.

A summary of the comments follows. The comments were grouped into four categories: NEPA Adequacy, Environmental Effects, Fuels Management, and Agency Comments.

#### 4.4.1 Comment Summary

##### 4.4.1.1 NEPA Adequacy

A number of the comments stated that the Environmental Assessment (EA) failed to adequately comply with all the NEPA guidelines and requirements. Some of the common concerns were:

- The need for action is not identified.
- The range of alternatives is too small.
- Analysis of potential impacts is incomplete.
- Cumulative impacts are not discussed.
- The best available science was not considered, used or cited in the analysis of impacts.

- The actions described in the EA are major federal actions and constitute an EIS.

**Response:** The need for the action is specified in section 1.2 Need for the Proposed Action. The two alternatives analyzed in this document represent alternative ways of meeting the purpose and need described in sections 1.1 and 1.2. The proposed action (Alternative B) was developed to respond to national policy and hazardous fuels conditions in Montana and the Dakotas. Alternative A (the no-action alternative) represents continuation of current management and provides a basis for comparison of alternatives and impacts. Some issues have been raised that are beyond the scope of this analysis. These are described in section 1.4.4 Issues eliminated from further study. Alternatives that would be tied to these issues were not analyzed because they were outside the scope of analysis or they were considered to be of speculative feasibility. Other alternatives emerged from internal analysis or from public comments.

These were carefully considered but eliminated from detailed study for the reasons summarized in section 2.4. Finally, some issues and concerns were raised that resulted in modifications to the proposed action. Modifying the proposed action was more appropriate than specifying and analyzing a new alternative. Specifying a separate alternative in response to those issues would result in alternative(s) with impacts that are indistinguishable from those impacts of the proposed action.

Analysis of environmental impacts, including cumulative impacts, has been revised in response to comments, additional information, and subsequent BLM guidance concerning fire and fuels management. References cited in comments have been studied. Revisions have been made to include relevant new and additional information where appropriate. See chapter 3 for analysis of environmental impacts.

No significant impacts were indicated by the impact analysis. Documentation, including the rationale for the Finding of No Significant Impact (FONSI), is attached at the end of this analysis.

#### 4.4.1.2 Environmental Effects

Letters from groups and individuals were primarily concerned with the environmental effects of fuels management, and especially prescribed burning, on ecosystems, wildlife and their habitats, and wilderness areas.

##### Sagebrush Ecosystems and Sage Grouse Habitat

Each of the 22 letters from individuals addressed the plan's potential adverse effects on wildlife and their habitats. Ten of these letters specifically addressed the sagebrush ecosystem, and the wildlife species that depend on that ecosystem. The primary concern was over sage grouse, but

several letters mentioned the sage habitat's importance to pronghorn antelope, mule deer, and golden eagles.

This area of concern appeared in 14 of the comment letters. Some cited historically low fuel loads in sage/grassland habitats, and questioned the need for fuels management in these land cover types. Other comments addressed the adequacy of the effects analysis.

*"The plan proposes to ignite 'prescribed' fires on public lands in several western states, which would cause the needless destruction of millions of acres of already dwindling sage/grassland habitat."*

Six of the 14 letters also stated that adverse effects on the sage grouse could require their listing under the Endangered Species Act.

*"...this action has the potential to adversely affect sage grouse, and possibly result in the need for listing under the ESA."*

Two comment letters referred to the Western Association of Fish and Wildlife Agencies (WAFWA) Memorandum of Understanding signed by the BLM. The WAFWA MOU was not mentioned in the EA and no reason was provided for the departure from the WAFWA guidelines for sage grouse conservation.

Another concern expressed was whether or not prescribed burning would be beneficial in sagebrush ecosystems. A letter challenged the conclusion in the EA stating that the long-term benefit of burning sagebrush ecosystems is greater perennial grass production. A study of big sagebrush ecosystem recovery by C.L. Wambolt et. al. is cited.

*"The Wambolt research would indicate that the benefits of fire to forage production are short-term while having long term detrimental effects on sagebrush obligates."*

**Response:** BLM responded to these comments by clarifying the following portions of the EA:

- Anticipated Level of Activity: It is anticipated that 3 percent or less of BLM shrublands would be treated with prescribed fire or mechanical treatments. Also only a portion of these shrublands would be sagebrush.
- Management Common (section 2.5.1) clarifies the intent of treating shrublands.
- Purpose and Need indicates that Condition Class 2 and 3 areas would be the primary focus of fuels reduction treatments.

A description of the affected environment of terrestrial species and habitat as well as environmental consequences is available in section 3.2. This includes analysis of sagebrush ecosystems and sage grouse habitat. The impact

analysis is based on the anticipated fire suppression actions and fuel reduction treatments on 3 percent or less of shrublands per decade with either alternative. The primary purpose of these treatments would be to control encroaching conifers. See the description of treatments in section 3.1.1.3.

#### Wilderness

One of the letters expressed concern over how some of the forest acres were categorized. It was stated that more acres could have been categorized under Categories C and D, which allows for more prescribed fire use and wildfire may be desired.

*“It would have been ideal to have more acreage fall into the Category C and D, where wildfires will be allowed to burn, and prescribed fire would have a large role.”*

One of the letters that expressed concern over the use of prescribed fire in sagebrush ecosystems commented specifically in support of the conclusions contained in comment letter #8.

*“We feel there is a much more significant ecological role for fire in forest habitats comprised of fire adapted species in contrast to shrub-steppe habitats where climax species such as sagebrush are killed by fire. We would support an analysis of more prescribed fire and less fire suppression in forested wilderness and wilderness study areas.”*

Another letter expressed that wild, untouched forested areas have more natural defenses to fire than developed areas. It was stated that fire suppression or fuels reduction activities could increase fire severity in these areas.

**Response:** WSA polygon categories were re-evaluated to determine whether natural ignitions could be allowed to burn in wildland areas. The categorization of one polygon (which included three WSAs) was changed from B to C. Reasons for not changing the categorization of other fire management zones are described in section 2.4.2.

An estimated 85 percent of forestlands in Montana are in condition class 2 or 3. It is anticipated that with both alternatives, over 60 percent of all the areas treated would be forestlands compared to less than 17 percent for shrublands.

#### Vegetation

One comment letter suggested a more specific discussion of the various vegetation types present in Montana and the Dakotas and how they respond to fire.

*“No descriptions, analysis or even conclusions are presented concerning the anticipated effects of Alternatives A and B on grasslands, shrublands and forestlands.”*

**Response:** See section 3.2. Grasslands are analyzed in section 3.2.1, shrublands are analyzed in section 3.2.2, and forestlands are analyzed in section 3.2.3.

#### Wildlife

The same letter indicated that the EA's discussion on wildlife including T&E and BLM sensitive species was also inadequate, and should be more specific to Montana.

*“The discussion of effects on fish and wildlife should address how the alternatives might be expected to affect the distribution and abundance of habitats for these [mule deer] and other species.”*

As discussed above, all 22 comment letters from individuals addressed wildlife. Ten of the 22 specifically mentioned sagebrush ecosystems and species, and the remaining 12 expressed concern over potential adverse effects on wildlife and their habitats. Eleven of these letters identified that an EIS is the desired level of analysis.

**Response:** The affected environment and anticipated environmental consequences on aquatic habitats and species are analyzed in section 3.6, terrestrial species and habitats (including Special Status Species) are analyzed in section 3.7, and federally threatened, endangered, and proposed species are analyzed in section 3.8.

#### **4.4.1.3 Fuels Management**

The EA proposes to reduce hazardous fuels by prescribed fire, mechanical and other means. Comments regarding fuels management ranged from questioning the need for fuels management in some areas to stating that the EA should more clearly indicate guidance on where and what type of fuels management would be used.

Another letter indicated that it is structure ignitability that is responsible for structure loss and not fuels buildup. The letter states,

*“The NEPA document must provide scientific support that vegetation treatments will decrease susceptibility to wildfires.”*

The same letter continued,

*“An unnatural fire policy (even on grasslands) could prevent fire from playing its natural role, and may turn out to be just another ill-conceived form of vegetation manipulation.”*

An organization expressed concern with the discussion about what types of fuels treatments would be used and some suggestions were made.

*“The EA vaguely refers to a number of actions that could be taken to reduce fuels.”*

*“Thinning [in ponderosa pine forests] may improve forest structure and productivity, benefit wildlife habitat and reduce some fire risk.”*

The letter also indicated that thinning may not be necessary in high elevation forests and that the BLM field offices should received guidance on how best to use fuels treatments in a variety of habitat types.

**Response:** The need to reduce hazardous fuels is a major component of the National Fire Plan. See section III (Key Elements of the Administration’s Wildland Fire Management Policy), subsection B (Reducing Hazardous Fuel Accumulations) of *A Report to the President in Response to the Wildfires of 2000* (<http://www.fireplan.gov/president.cfm>). This section references several examples where fuels treatments mitigated the severity of wildfires that later occurred on treated areas, including an example from the Jasper Fire in South Dakota.

Table 4 and 5 indicate the anticipated levels and types of treatments (prescribed fire, mechanical, and chemical weed treatments) that may be used within the different fire management categories and on different types of vegetation. This is also used as a basis for impact analysis.

Specific decisions on where and how fuels treatments would be used will be made at the project level.

#### 4.4.1.4 Agency Comments

Comments from other agencies focused primarily on how their management directions would be affected by actions described in the BLM’s Fire Management Plan/Plan Amendment Environmental Assessment. Some of the agencies also provided clarification on boundaries and “on the ground” conditions, and suggested adjustments where appropriate. For example, one agency comment questioned the need for prescribed burning in the Missouri River Breaks Uplands fire management zone, which is managed by the Malta Field Office.

*“Another justification for prescribed burning in the Missouri Breaks Uplands is to create a mosaic of habitat types to benefit wildlife; however, such a mosaic already exists as stated in your Area Description.”*

One agency comment was similar to those comments described in sections 4.4.1.1 and 4.4.1.2, regarding NEPA adequacy and potential effect on the sage grouse. Specifically, the comment indicated that increasing use of prescribed fire could represent a possible significant impact on the human environment, and that an EIS-level analysis may be more appropriate based on potential effects on wildlife species and sage grouse in particular.

The agency indicated that effects of the proposed action could not be determined without knowing the locations of priority interface areas referenced in the EA.

Response: See response to comments in sections 4.4.1.1 and 4.4.1.2. Map 2 shows communities/areas at risk from wildland fire that are near BLM lands.

## 4.5 Public Comments on Revised EA

The EA was revised and re-released for public review and comment in May 2003. BLM received four comments on the revised EA. These comments are summarized below.

The Montana State Historic Preservation Officer suggested clarifications to the resource protection guidance included in the proposed action (section 2.5.3.1).

The Montana Department of Transportation clarified the notification requirements if MDT rights-of-way are needed for access during projects.

Montana Fish, Wildlife & Parks noted concern with burning in sagebrush-grassland in relation to the needs of sage grouse, pygmy rabbits, and other obligates of the sagebrush steppe habitat type. FWP acknowledged the reference to BLM’s Special Status Species policy, which is to “ensure that actions authorized, funded, or carried out by the BLM do not contribute to the need for listing a candidate or BLM sensitive species under the Endangered Species Act.”

Stephen J. Flynn, Resource Manager of Louisiana-Pacific Corporation, commented that the RPZ recommendation included in Alternative B is excessive, and that the Streamside Management Zone is adequate.

Response: Slight modifications were made to the guidance (section 2.5.3.1) to respond to the comments from the MT SHPO. The RPZ concept was included in the design features under Alternative B to avoid significant impacts to aquatic resources. See section 3.6 and Appendix D for the rationale for including RPZ approaches in the proposed action.

