



Montana Fish, Wildlife & Parks

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Region Three
1400 South 19th
Bozeman, MT 59718

June 29, 2004

Dillon RMP Team
BLM Dillon Field Office
1005 Selway Drive
Dillon, Montana 59725

Dear Sirs:

This letter contains our comments to the Dillon Draft Resource Management Plan and Environmental Impact Statement (DRMP/EIS). We will be using specific page numbers that will refer to Volume 1 of the DEIS (unless otherwise indicated). Most comments relate to alternative B unless otherwise indicated. Some of our remarks will be general in nature, but mostly we will comment on specific issues and list the page where they occur. In some cases there will be more than one comment on a specific issue. This is generally to separate remarks from fisheries, wildlife, parks or enforcement. To make it easier to refer to specific issues or topics, we have listed them alphabetically.

FISH & WILDLIFE

- Page 75 – Concur with management common to all alternatives. Especially like the coordination with FWP on beaver management.
- Page 75 – issue 2, Alt B - Include fluvial and adfluvial grayling along with WCT (due to the concern and status given to protection of the grayling).
- Page 75 – issue 2, Alt B - The protection of only spawning areas is too narrowly focused. Should provide protection for entire stream (stipulations on page 48 appear to include entire stream).
- Page 75 – issue 3, Alt B - The emphasis should be on streams designated by FWP as “priority” as well emphasizing WCT and grayling habitat. Priority streams are those identified by FWP in local areas as having special attributes needing attention. These are not necessarily the officially listed “blue ribbon” streams. Suggested wording for alternative B would be “Pursue water leasing and improved water management to benefit fisheries values in coordination with FWP for streams designated as priority and/or those with grayling and/or WCT

ENCLOSURE 2

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habitat." The rationale here is that most if not all fisheries streams should receive proper water management and not just those with special status species.

- Page 75 – For issue 4, alternative A covers the issue adequately.

FOREST PRODUCTS

- Page 100, issue 1 – We have concerns about the timber acreages being listed for harvest. Please note the comments under VEGETATION-FOREST AND WOODLANDS, page 91, issue 2 (page 5 this letter).
- Page 101 – issue 2, Alt B - Commercial thinning in lynx habitat will obviously have to adhere to guidelines noted in the *Lynx Conservation Assessment and Strategy and Lynx Conservation Measures* (page 44 – volume 2).

LANDS AND REALTY

- Page 104, Management Common to All Alternatives – We essentially concur with these actions and especially applaud the maintenance of public access noted in bullet 1.

MINERALS – LEASABLE

- Page 48 – The stipulations in Table 6 for arctic grayling and Westslope Cutthroat Trout (WCT) are not strict enough in alternative B. The grayling should be a NSO of 1 mile preferred or at least NSO ½. WCT Habitat 99-100% should be NL 1 and WCT Habitat of 90% should be NSO (both as in alternative C). We believe these measures are essential to avoid unacceptable impacts on these sensitive species.
- page 110, alternative B – BLM land immediately around Bannock has been withdrawn from mining under an RP&P (Recreation and Public Purposes Patent). It appears this area would be closed to oil and gas leasing in alternative B (National Historic Landmarks). FWP supports this closure.
- Page 110, issue 4 – We recommend FWP Wildlife Management Areas (WMAs) be included in this withdrawal in alternative B. Even though State Game Ranges would have a NSO under alternative B (page 48), we are concerned that activities related to exploration and travel, as well as the disturbance from off-site drilling, could negatively impact the use of these areas by big game.
- Page 111, issue 1 – This section is somewhat confusing, since it refers to Appendix I where it appears off-road travel could be allowed on a case-by-case exception basis in regards to locatable minerals. While we understand that the surface owner has the sole right to dictate travel restrictions, some WMAs (such as Robb/Ledford) have BLM inholdings that are managed in conjunction with the state game range. Others, such as Wall Creek, have adjacent BLM lands that are closely linked and associated with wildlife use on the WMA. Therefore, we recommend no travel off open roads on WMAs or associated BLM lands for exploration or development of minerals.

MINERALS, LOCATABLE

- Page 113 – Issue 2, Alt. B – We recommend you withdraw from locatable mineral entry, 99% - 100% pure WCT streams, and all fluvial and adfluvial grayling waters.
- Page 113, issue 2 - Specific support for the withdrawal of Axolotl Lakes and Road Agent Rock from mineral entry.
- Page 113, issue 2 – We recommend you add WMAs and established big game winter ranges to the withdrawal list for mineral entry. These areas were specifically purchased to protect wildlife and key habitats and should be protected from mining disturbances. Some BLM inholdings on WMAs like Robb/Ledford could experience mining activity that could affect the entire game range.

NATIONAL TRAILS

- Page 126, issue 1 - Specific support for the management of the Lewis and Clark National Historic Trail.

NOXIOUS WEEDS

- Page 5, issue 3 - We recommend that you emphasize that any hay used to feed livestock on BLM land, whether involving commercial or private operations, be required to be certified “weed free.”

PRESCRIBED FIRE

- We recommend that the evaluation for the need of management actions be coordinated with FWP area field biologists to ensure consideration of potential wildlife impacts such as those associated with key seasonal ranges.

RECREATION

- Page 115, issue 3 - We strongly support the coordination of river recreation management between BLM and FWP as noted in alternative B.

RIPARIAN-WETLAND HABITATS

- Page 79 – Riparian-Wetland Habitats – For issue #2, use alternative C because of the presence of and importance of grayling.

SAGEBRUSH STEPPE HABITATS

- Page 78, issues 1-3 – We support the Montana Sage Grouse Conservation Strategy and the recommendations laid out in that document and encourage the BLM to utilize those recommendations. Adopting the guidelines in the above document as standards should be considered (as in alternative C). Recognizing

that many ecological factors (i.e. elevation, climate, plant species, soil types, etc.) can affect specific on site conditions, these need to be factored in when using any management guidelines and making recommendations. Another critical element here is the need for a data base and follow-up monitoring on areas to be managed. Again, coordination with our field biologists is highly encouraged.

- Page 79, issue 4 (Bighorn Sheep) – The recommendation in alternative B produces an implied threat to private livestock producers leasing BLM land. This becomes a major issue for FWP in our bighorn sheep transplant program. Often, suitable bighorn sheep habitat is found both on private and public land. Landowners have often been unwilling to participate in the program if they feel their livestock operation (especially domestic sheep) could become threatened. FWP has been able to significantly reduce this problem by utilizing the FWP document entitled *Bighorn Sheep Transplant Guidelines for Newly Established Herds* (Attached). We recommend you change the wording in alternative B to more reflect the guidelines in our document and possibly even making reference to it.

* SPECIAL DESIGNATIONS – ACECs

- Page 64 – We give specific support for the withdrawal of Beaverhead Rock from mineral entry and for the potential conveyance of this area to the State of Montana.
- Page 125 – issue 1 – Are alternatives C and D switched?
- Page 125 – issue 1 – We feel two ACEC areas earlier recommended by FWP (upper Horse Prairie and the upper Centennial) should have been included in your final selection because of the importance of native fish species in those areas. On page 178 (Vol. II), 84 miles of WCT habitat (greater than 99% pure) are listed as a value of concern. The Centennial Valley (page 179 – Vol. II) and Horse Prairie Watershed (page 180) were rejected since they “did not meet the relevance criteria.” The lack of consideration of any ACECs for their WCT values is a major concern with this section of your plan. We would be willing to provide information to support the nominations mentioned above.

SPECIAL STATUS SPECIES – ANIMALS

- Page 85, issue 3. You plan to implement food storage strategies from the Southwest Montana State Grizzly Management Plan in the Grizzly Bear use areas if these bears become delisted (page 26). Grizzlies have been known to frequent some of the BLM lands covered by this plan (i.e. Madison, Gravelly Mountains and south side of the Centennial areas). We recommend you consider these strategies prior to delisting to reduce the potential for conflicts between humans and grizzlies. Food storage is also an issue with black bears. Our field personnel frequently become involved in moving black bears due to these animals getting into people food at camp grounds. We suggest you coordinate food storage regulations with adjoining Forest Service land where possible.

SPECIAL STATUS SPECIES – FISH

- Page 87 – Management Common to All Alternatives – bullet #4 – Recommend you change wording to “Encourage.....to reduce *fish* loss *into* irrigation ditches.”
- Page 87 – issue #2 – Alt. B does not appear to have restrictions as tight as noted in the stipulation on page 48. The requirements listed for this issue should apply to streams in general since habitat protection should apply to all fisheries streams. Also, we recommend you modify the wording from 100 feet to within 100 year flood plain.
- Page 87 – for issue #3 in alt. B, please include “priority streams” (as identified by FWP), not just WCT streams.

TRAVEL MANAGEMENT

- FWP supports the concept of closing and/or opening specific trails instead of designating special area-wide road management areas.
- We recommend the BLM utilize the same time period restrictions used by the USFS for public camping. We understand the USFS uses 16 days and the BLM 14 days. This would help clear up any confusion with the public and would likely make enforcement easier.
- In the travel plan map, the (-.-.-) symbol in the legend created some confusion. In bold it indicates vehicle restrictions from April 1 – July 1. In non-bold, it merely indicates a 4 wheel drive trail. We suggest using a different symbol for one of those classifications in any final version of the map that might be used by the public.
- The “open year around” solid line is the same as the paved road solid line and is confusing. We suggest differentiating these.
- A section of trail in T10S, R5W NENE Section 4 related to the Robb/Ledford Wildlife Management Area, should be shown as an open road. There is an open DNRC road on both sides of this trail.
- In T9S, R5W, NW Section 10, there a section of road between a DNRC and BLM open trail that should also be open.
- In alternative B, it should show the Shineberger Creek road crossing the Snowline country as public access.
- The road through BLM T13S, R1W, Section 17 in the Snowshoe Creek area should be open to the public. It shows closed in alternative B.
- On Map 78 (Big Game Winter Habitat) it should include BLM in section 31 east of Wisdom as important winter range for elk.
- We support the BLMs efforts in obtaining access to public land in the Lost Creek area on the east side of the Pioneer Mountains. We encourage you to continue this effort.

VEGETATION – FOREST AND WOODLANDS

- Page 91, issue 2 – We appreciate your statement that timber acreages are upper limits (by using the phrase “up to”) rather than establishing an absolute target. Targets tend to become mandatory goals and can overshadow biological concerns which should be addressed at the project level. We encourage you to continue to involve our field biologists in the evaluation of proposed timber projects with adequate lead time for meaningful input.
- Page 91, issue 3 – Again, as in issue 2 above, we appreciate that the acreages are not listed as “targets.” Aspen treatments need to consider site-specific situations such as the reason for the problem, the cause, the importance of the associated existing vegetation to the ecology of the area, etc. Monitoring is extremely important here to make sure treatments are providing positive results.

VEGETATION – RANGELANDS

- As has been emphasized earlier, we
- encourage you to continue to involve our field biologists in the evaluation of proposed treatments with adequate lead time for meaningful input. We are uncomfortable basing treatment solely on historic fire intervals. Special wildlife needs will need to be considered such as key seasonal habitats.

VEGETATION – RIPARIAN AND WETLANDS

- Page 96 – issue 2, Alt B – Reverting conifer cover to deciduous cover could result in a change of fish species composition. We recommend consultation with FWP prior to any such action.

WATER

- Page 98 – Desired Future Condition, bullet #2 – intent okay, but should rewrite this for clarity.
- Page 98 – Management Common to All Alternatives – Need to make some reference to the Federal Clean Water Act and or EPA standards. Should apply the one which is the most restrictive.
- Page 98 – last bullet in Management Common to All Alternatives – it is important that you actually list all of the required permits needed to assure full compliance.

WILDLIFE

- Page 76 – We concur with the *Management Common to All Alternatives* and especially want to emphasize the importance of coordination of vegetation projects with our field biologists.
- Page 76 – issue 1 – Due to habitat variability, big game vulnerability and the open nature of BLM timber lands in general, it may not be appropriate to apply the

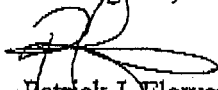
same standards (i.e. leaving established timber core block sizes and harvesting or not in adjacent 6th order drainages) in all situations. Timber prescriptions to reduce the impact on wildlife are best coordinated in the field between our wildlife biologists and BLM field staff.

- Relating specifically the definition of core blocks as 250 acres in size: This size may be fine west of the continental divide (CD), where there is more forested habitat and where forested habitat is not as inherently broken. However, east of the CD, where forested habitat is more limited and inherently broken, the 250-acre definition for a core block is too limiting. Important security cover can and is provided by smaller blocks, which should also be protected. The core block definition you have proposed, most likely adapted from the Hillis paradigm, was developed in a totally different location in western Montana, in smaller analysis areas, and where there is more cover. Although the principals of this method may be good, the numbers are not applicable in some of the area covered in this plan where cover is already limiting, there are many small security blocks and road density is high.
- Including a mitigation measure that allows FWP, through field review and consultation with your agency, to designate other important security areas, would be beneficial. This would be a positive step toward addressing the problems with the scale and timing of analysis for this EIS and associated Watershed Assessments.
- Page 76, issue 2 – We support alternative B with one mile of open road per square mile in the more heavily timbered areas. Much of southwest Montana on BLM is lightly timbered and may require a lower road density to address key security for wildlife. One mile should be considered a maximum and not a “target.” Consultation with our local biologists is important for project specific recommendations on these projects.
- Page 77, issue 4 – We support alternative B to improve bighorn habitat by reducing forest habitat where this action is necessary and appropriate. Due generally to the “open” nature of BLM forest lands, this may not be a necessity in many areas

Throughout the plan you make references to the continued involvement and coordination between your staff and our biologists in the planning and development of your site specific projects. We strongly support this action as providing the best opportunity for our involvement.

Thank you for the opportunity to comment and thank you for your serious and thoughtful consideration of our comments and we look forward to a continuing working relationship with you. If you have any comments or clarifications on our recommendations, please feel free to contact me at 994-4042. Thank you.

Best regards,



Patrick J. Flowers
Region Three Supervisor

Cc: Kurt Alt, Bruce Rich, Sam Sheppard, Jerry Walker

MONTANA FISH, WILDLIFE & PARKS COMMISSION
JUNE 2, 1995
FINAL
BIGHORN SHEEP TRANSPLANT GUIDELINES
FOR NEWLY ESTABLISHED HERDS

To reduce the possibility of disease outbreaks in newly established transplanted bighorn sheep herds, and to provide assurance to landowners that the presence of newly established bighorn sheep will not be used by the Department and/or Commission to restrict existing land management, it is the policy of the Montana Fish, Wildlife & Parks Commission pursuant to Montana's Importation, Introduction, and Transplantation of Wildlife statute (87-5-701-721, MCA) to:

- 1) give preference to those sites which are not in close proximity to domestic sheep or are separated by physical barriers to reduce potential of interaction.
- 2) consider only transplants to those sites with a majority of public land and/or legal or landowner granted access to assure that hunting and trapping can be used to control herd size in the future.
- 3) approve transplants only with the written approval of the private landowners in the area where the herd is expected to establish.
- 4) approve transplants only where the department has determined that there is sufficient winter and other seasonal range capacity, considering current livestock use and potential for competition with other wild ungulates, to support the anticipated population size.
- 5) utilize hunting and trapping for relocation to control herd size within previously established levels unless mutual agreement to allow an increase can be reached by affected landowners within the herd's primary range.
- 6) take actions to prevent the establishment of bighorn sheep populations on private lands other than the predicted area unless the affected landowner(s) approve.
- 7) approve transplants only in cases where there are significant public benefits.
- 8) assume the risk of transplant failure, holding no private landowner or public grazing allotment lessee responsible without proof of negligence.
- 9) not seek modifications, without the consent of the affected livestock owner, to state or federal allotments or other management plans in the unlikely event that bighorn sheep from a transplanted herd establish in another area utilized by domestic livestock.