

## 5.0 Consultation and Coordination

The Petrolia Watershed Plan/EA was prepared by a BLM interdisciplinary team including:

- Lowell Hassler, Team Leader/Natural Resource Specialist
- Katie Krantz, Rangeland Management Specialist
- Fred Roberts, Wildlife Biologist
- Chad Krause, Hydrologist
- Zane Fulbright, Archaeologist
- Bruce Reid, Forester
- Adam Carr, Rangeland Management Specialist
- Dan Frank, Cartographic Technician
- Betty Westburg, Range Technician
- Rod Sanders, Recreation Specialist
- Jennifer Walker, Fuels Technician
- Steve Knox, Fuels Specialist
- Dan Brunkhorst, Rangeland Management Specialist
- Vinita Shea, Rangeland Management Specialist

Other BLM personnel who provided assistance:

- Craig Flentie, Public Affairs Specialist
- Jerry Majerus, NEPA Coordinator
- Willy Frank, Assistant Field Manager, Resources
- Kay Haight, Administrative Assistant
- Linda Roberts, Administrative Assistant
- Loyd Bantz, Civil Engineering Technician
- Mike Barrick, Range Technician
- Loretta Park, Realty Specialist
- Joe Platz, Fisheries Biologist

Other agency personnel involved in or notified during the planning process:

- Tom Stivers, MT FWP
- Anne Tews, MT FWP
- Clive Rooney, MT DNRC
- Ted Hawn, NRCS, Fergus County
- Nikki Rife, NRCS, Petroleum County

All grazing permittees were contacted by mail or phone during the planning process. The BLM met with all permittees whose allotments were not meeting one or more of the rangeland health standards. A public meeting was held Tuesday, March 7, 2006 in the Petroleum County Courthouse.

### 5.1 Comments on Preliminary Petrolia Watershed Plan/EA

The Preliminary Petrolia Watershed Plan/EA was completed and distributed on January 22, 2007. The plan was mailed to all affected grazing permittees, cooperating agencies and members of the public who expressed an interest during the planning process. The public review period was 30 days; the final day for comments was February 23, 2007 as indicated in the cover letter attached to the plan.

Comments received and the BLM's responses are listed below.

Grazing/Rangeland Administration:

- Comment 1 (C1): Preliminary plan does not reflect grazing season of use discussed in consultation for the Bear Creek Allotment No. 14912, ID No. 025.
- Response 1 (R1): The final plan will be modified as indicated in Chapter 2, proposed action for the Bear Creek Allotment, ID No. 025.
- C2: The preliminary plan does not reflect the grazing season of use discussed in the consultation for the Petrolia Bench Ranch Allotment No. 04901, ID No. 001.
- R2: The final plan will be modified as indicated in Chapter 2, proposed action for the Petrolia Bench Allotment, ID No. 001. Also, Allotment ID No. 123 will be changed to reflect the same season of use due to an exchange of use agreement between these two allotments.
- C3: The preliminary plan does not reflect the grazing season of use discussed in the consultation for the Wild Horse

- Allotment No. 15072, ID No. 059.
- R3: The final plan will be modified as indicated in Chapter 2, proposed action for the Wild Horse Allotment.
- C4: The grazing permittee would like to modify the season of use in the Box Elder Allotment No. 02529, ID No. 009 to allow post-harvest utilization of private crop aftermath followed by re-entry onto public land in the late fall/winter
- R4: The final plan will be modified as indicated in Chapter 2, proposed action for the Box Elder Allotment No. 02529, ID No. 009.
- C4a: The grazing permittee would like to modify the season of use in the Sheep Wagon Allotment No. 15064, ID No. 012, to allow post-harvest utilization of private crop aftermath followed by re-entry onto public land in the late fall/winter. In addition, the season of use is proposed to be modified in the Aikens Allotment No. 25012, ID No. 013, to accommodate trailing cattle to and from the Sheep Wagon Allotment in the spring and fall. Summer grazing would be avoided in the Aikens Allotment. The permittee would also like the flexibility to graze the Sheep Wagon Allotment in conjunction with the Box Elder Allotment utilizing a modified rest rotation grazing system. The flexibility to combine grazing would allow coincidental use of private crop aftermath.
- R4a: The final plan will be modified as indicated in Chapter 2, proposed action for the Sheep Wagon Allotment No. 15064, ID No. 012 and the Aikens Allotment No. 25012, ID No. 013.
- C5: The grazing permittee would like to modify the season of use in the Yellow Water Basin Allotment No. 04898, ID No. 052, to utilize crested wheatgrass in the early spring and fall. The permittee also noted that a proposed stockwater pipeline would cross public land within the allotment. The permittee proposes construction of a fence to separate
  - private from public land within the allotment.
- R5: The final plan will be modified as indicated in Chapter 2, proposed action for the Yellow Water Basin Allotment No. 04898, ID No. 052 to reflect the change in season of use, the stockwater pipeline, and the pasture fence.
- C6: The grazing permittee of the West Winnett Allotment No. 15023, ID No. 108, would like to continue an existing exchange of use with an adjacent permittee and eliminate the changes proposed by the BLM in the Preliminary Plan.
- R6: Current grazing regulations do not allow the BLM to accept lands enrolled in the Conservation Reserve Program for an exchange of use.
- C7: The Preliminary Plan does not reflect the desired season of use that has been applied for by the grazing permittee in the Gilt Edge Allotment No. 02620, ID No. 034.
- R7: The requested season of use would not meet resource objectives given current rangeland conditions, therefore, the Final Plan will not be changed.
- C8: The grazing permittee of the Maginnis Creek Allotment No. 00985, ID No 035, and the Alan Ind. Allotment No. 15119, ID No. 036 proposes three options to the BLM proposed actions in Chapter 2 of the Preliminary Plan.
  1. Sign an intent to purchase the BLM land & make no operational changes.
  2. Turn wells off to reduce livestock grazing on BLM this year.
  3. Build a fence and utilize the well in the allotment to manage cattle grazing and facilitate sheep grazing.
- R8: The final plan will be modified as indicated in Chapter 2, proposed action for the allotments discussed in C8 above.
- C10: The grazing permittee of the Yellowwater Allotment No. 15040, ID

- No. 003 would like the paragraph regarding a private land exchange and fence change removed from the document due to the indefinite nature of these proposals.
- R10: The final plan will be modified as indicated in Chapter 2, proposed action for the Yellowwater Allotment No. 15040, ID No. 003.

#### Upland/Riparian Health

- C9: The Preliminary Plan does not address drought; management objectives should be changed due to current drought conditions.
- R9: Drought is referenced in the Preliminary Plan, sections 3.2 and 4.1.2. The BLM MT/Dakotas drought policy has been added to the Final Plan as Appendix N. Proposed short and long term objectives would not comply with current BLM regulations if rangeland health standards are not being met due to current livestock management. Upland and riparian health within grazing allotments are assessed versus their potential given the upland ecological site description and the highest ecological status a riparian-wetland area can attain given no anthropogenic constraints. When health assessments indicate that rangeland health is degraded, all contributing factors, including prolonged drought, are considered. When the BLM determines an allotment is not meeting Standards for Rangeland Health and current livestock management is considered a factor, however, a change in management is required under the Grazing Regulations. The rate of rangeland improvement will be dependent on the site's capability to recover, including the amount of available surface and subsurface moisture.
- C15: Clarification of BLM's drought policy would be appreciated.
- R15: Please see R9.

- C17: The riparian area of Ford's Creek in the Forgy Common Allotment No. 12700, ID No. 132 could be chemically treated for Whitetop even though snowberry would be chemically burned. Implementation of an experimental sheep grazing program on Whitetop would do more harm than good; sheep will target snowberry and will not eat Whitetop.
- R17: The LFO is very concerned with the threat of Whitetop within the planning area. The action plan for the Forgy Common Allotment No. 12700, ID No. 132 incorporates a containment and control strategy as indicated in Chapter 2, proposed action for this allotment. We have researched our options thoroughly, including a public forum on Oct. 4, 2005 regarding noxious weed control within riparian areas. Weed control options within riparian zones are limited by:
  - BLM regulations
  - Herbicide label restrictions
  - Montana water quality regulations
  - Riparian vegetation concerns
  - Wildlife concerns
  - Other agency concerns, including MT FWP, MT Dept. of Ag., EPA, Federal and MT Dept. of Environmental Quality

Metsulfuron Methyl (Escort) is currently the only herbicide approved for use on BLM land which provides effective Whitetop control. Escort's limitations in riparian zones are:

- Potential to contaminate groundwater in very low concentrations
- Very mobile in silt loam and sandy soils
- Labeled for control of several non-target riparian species including – green ash, aspen, cottonwood, hawthorn, snowberry, wild rose, peachleaf willow, sandbar willow, chokecherry.

The proposed sheep grazing experiment on Ford's Creek would be developed and conducted by MSU-Bozeman. The experiment would be a closely monitored project with quantifiable results ultimately determining efficacy and potential for continuation.

The BLM will continue to cooperate with permittees and interested individuals and agencies in our effort to control noxious weeds in the LFO.

#### Wildlife

- C11: It is our belief that the standard 4" stubble height will not be adequate residual cover for ground nesting birds. If BLM manages for 4" grass stubble height as the minimum, it is safe to assume *all* of the forbs will have been consumed at that point (if any remain).
- R11: The BLM has allocated 50% of the available forage in livestock grazing allotments for wildlife. Under Alternative 2, stubble height or percent utilization limits of key upland grass species would be applied as a monitoring tool to ensure upland objectives and guidelines for livestock grazing management are met. The stubble height or utilization limit is based on studies that demonstrate greater vigor of grasses grazed at moderated levels (Hardy 1950, Troxel and White 1989, Vallentine 1990, Van Pollen and Lacey 1997). The majority of forbs present in the planning area are unpalatable or undesirable to cattle (App. H). Proposed forage utilization levels would not lead to livestock consumption of all or a significant proportion of the forb component of upland or riparian vegetation.
- C12: A prairie dog town is expanding in the Yellowwater Allotment No. 15040, ID No. 003. The permittee would like the BLM to control the prairie dog numbers.
- R12: Please refer to Section 2.3.3 in this document.

- C13: We oppose additional livestock water developments and pipelines due to increased livestock utilization.
- R13: Several pipeline extensions and stockwater tanks, originating from existing groundwater wells on private land, are proposed in the Petrolia Watershed Plan. None of the water developments are proposed without coinciding changes in grazing management, such as a deferred or rest-rotation grazing system. The BLM's goal is to improve the vegetative cover of uplands and riparian areas, thereby improving wildlife habitat, increasing infiltration rates, decreasing erosion and sedimentation, and retaining effluent flows throughout the summer for a longer period of time.
- C16: More emphasis should be placed on forbs and shrubs when evaluating rangeland health. BLM Standards and Guidelines may not be adequate for wildlife.
- R16: The BLM is required by regulation to assess rangelands based on the Standards for Rangeland Health developed and adopted by the Central MT RAC and the LFO (Appendix B). BLM assessment methodology may be reviewed in Technical Reference 1734-6, Interpreting Indicators of Rangeland Health. An electronic version is available at: <http://www.blm.gov/nstc/library/techref.htm>

#### Hydrology

- C14: Additional stockwater reservoirs will cause adverse impacts by contributing to the chronic dewatering of the Musselshell River.
- R14: The BLM is aware of CMR's concern with stockwater reservoirs within the Musselshell River watershed and the USA's unquantified federal reserved water right to the Musselshell and its tributaries. No reservoir construction is proposed in the Petrolia Plan. BLM does propose cleaning out one existing stockwater reservoir that has not developed wetland characteristics.