

# CHAPTER 7

## PUBLIC COMMENTS

### COMMENT ANALYSIS

#### Summary of the Comments

A total of 48 individuals, private organizations, and federal and state agencies submitted comments on the recommendations and/or analysis contained in the draft Garnet RMP/EIS. Oral statements were presented by three individuals or organizations at the public hearing in Missoula, Montana; and five letters were entered into the record.

Most of those submitting comments were concerned with wilderness recommendations, grazing, road management, wildlife habitat management, and forest management. Table 7-1 shows the number of contributors by topic or resource.

**TABLE 7-1**  
**NUMBER OF COMMENTS BY TOPIC**  
**OR RESOURCE**

Topic or Resource	Number of Letters Providing Comments
Wilderness	17
Grazing	11
Forest Management	11
Road Management	11
Wildlife Habitat Management	10
Garnet Ghost Town	9
Recreation Management and Use	9
Mining, Geology, Oil and Gas	9
Water	6
Land Ownership Adjustments	6
Economics	5
Special Management Areas	4
Weed Control	4
Cultural	3
Riparian Habitat Management	3
Monitoring	2
Miscellaneous	6

The wilderness recommendations drew the most comments (17). Forty percent of those addressing the wilderness recommendations favored designating more land as wilderness. Sixty percent supported the amount of land designated as wilderness in the preferred alternative.

On the other issues, there was a broad spectrum of comments. There were those who thought not enough emphasis was placed on wildlife habitat management, while others thought there was too much emphasis. Likewise three comments challenged the level of allowable cut as being too high, while seven thought it was good and one thought it was too low.

About 40 percent of the comments expressed a liking of the preferred alternative. Eight percent stated a preference for one of the other alternatives.

Most of the comments came from Montana. Nearly two-thirds of the comments came from within the counties that will be directly affected by the Garnet RMP/EIS.



### Analysis and Review Procedures

All comments were reviewed and considered. Comments warranting responses were those which:

- relate to inadequacies or inaccuracies in the analysis or methodologies used,
- identify new significant impacts,
- recommend reasonable new alternatives,
- involve disagreements on interpretations of significance, or
- indicate significant misconceptions or misinterpretations of BLM programs and policies.

Each letter and each person's testimony given at the hearing are reproduced in this chapter. Table 7-2 is a list of contributors and their corresponding identification number.

Portions of the comment letters are bracketed. The brackets have been assigned either a number or an

TABLE 7-2

## 7—Public Involvement      COMMENTS RECEIVED ON THE DRAFT RMP/EIS

	Identification Number
<b>Federal Agencies</b>	
Environmental Protection Agency, Helena, MT	1
Department of the Air Force, Air Force Regional Civil Engineer, Dallas, TX	2
Department of the Army, Seattle District Corps of Engineers, Seattle, WA	3
Department of Energy, Bonneville Power Administration, Portland, OR	4
Department of the Interior, Fish and Wildlife Service, Helena, MT	5
Department of the Interior, Fish and Wildlife Service, Billings, MT	6
Department of the Interior, Geological Survey, Reston, VA	7
Department of the Interior, National Park Service, Denver, CO	8
<b>State Agencies</b>	
Lubrecht Experimental Forest, Greenough, MT	9
Montana Bureau of Mines and Geology, Butte, MT	10
Montana Department of Fish, Wildlife, and Parks, Region 2, Missoula, MT	11
Montana Historical Society, Historical Preservation Office, Helena, MT	12
State of Montana, Office of the Governor, Helena, MT	13
<b>Businesses</b>	
Atlantic Richfield Company, Denver, CO	14
Bignell Ranch, Helmville, MT	15
Blackfoot River Ranch Inc., Helmville, MT	16
Bonita-Clinton-Potomac Cattle Association, Clinton, MT	17
Champion Timberlands, Milltown, MT	18
Dutton Hereford Ranch, Gold Creek, MT	19
Plum Creek Timber Company, Inc., Missoula, MT	20
Southern California Edison Company, Long Beach, CA	21
<b>Organizations</b>	
Back Country Horsemen, Missoula, MT	22
Five Valley Four Wheelers, Missoula, MT	23
Garnet Preservation Association, Missoula, MT	24
Montana Wilderness Association, Helena, MT	25
National Wildlife Federation Regional Executive, Bozeman, MT	26
Sierra Club, Bitterroot Mission Group, Missoula, MT	27
<b>Individuals</b>	
Donald Aldrich, Missoula, MT	28
Merrill Bradshaw, Jocko, MT	29
Allan Castonguay, Seeley Lake, MT	30
Allen Christophersen, Missoula, MT	31
Bruce Cox, Missoula, MT	32
Barry and Audrey Donnelly, Calgary, Alberta, Canada	33
Frank Fitzgerald, Drummond, MT	34
Doug Habermann, Bozeman, MT	35
Marvin Hammer, Missoula, MT	36
Helen Hammond, Missoula, MT	37
John Hollenback, Gold Creek, MT	38
Charles Kay, Missoula, MT	39
Russell Lawrence, Missoula, MT	40
Ivan Leigland, Missoula, MT	41
Jean Matthews, Missoula, MT	42
Mary Jane Adams Morin, Missoula, MT	43
May Nelson, Drummond, MT	44
Steve Stolp, Helmville, MT	45
Arnold Stoverud, Missoula, MT	46
Frank Trask, Jr., Deer Lodge, MT	46
Fred Weaver, Clinton, MT	47

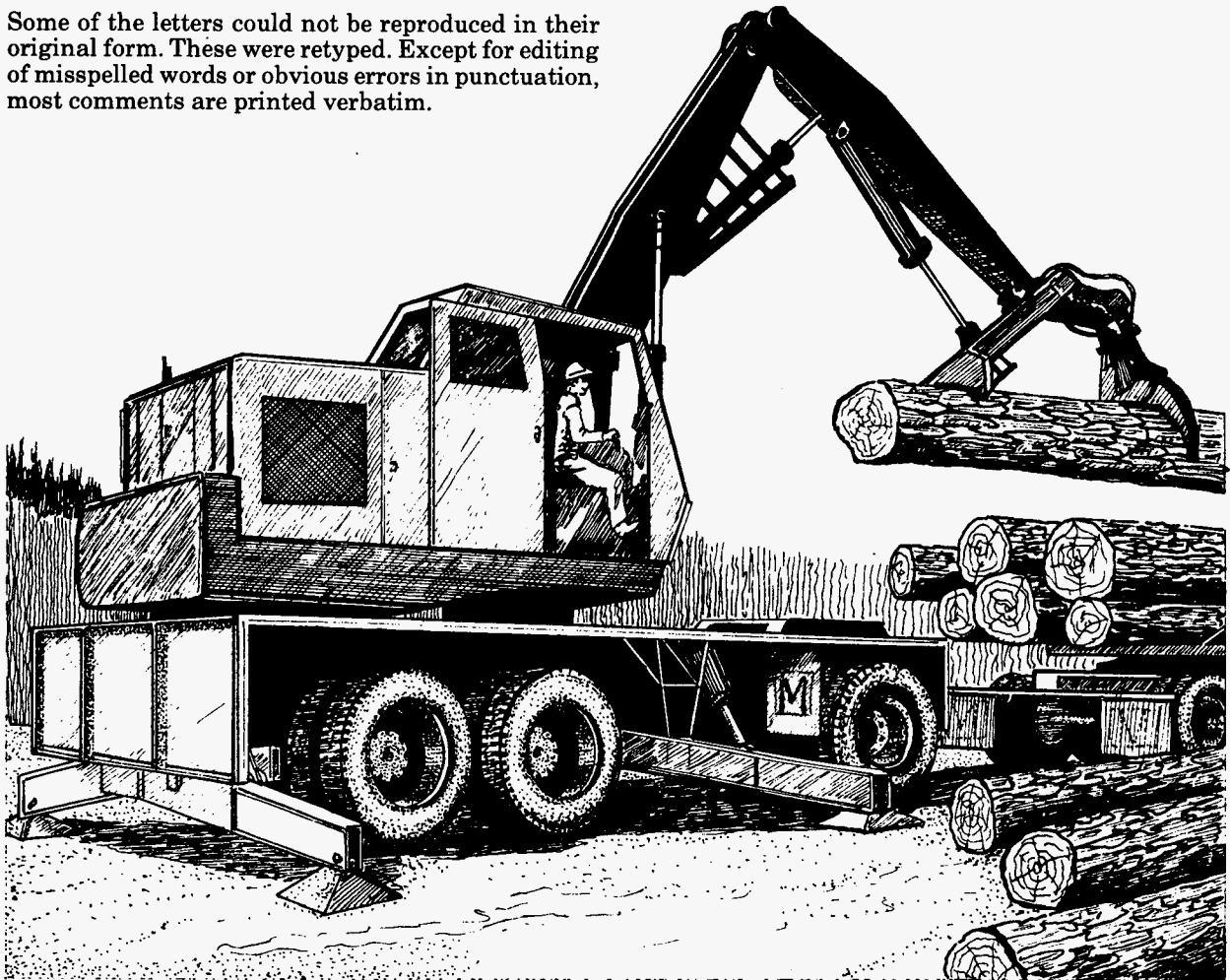
Testimony at Public Hearing

alphabetical letter. The response to the bracketed comment will have the same number or alphabetical letter. The numbers refer to responses given to comments which did not require a change in text of the draft. The alphabetical letters refer to responses which resulted in a change in the text of the draft. The responses are arranged by topic in the section titled Responses to Comments and Letters.

## **PUBLIC COMMENTS ON THE DRAFT RMP/EIS**

All comments and the public hearing transcript will be available for inspection at the Garnet Resource Area office in Missoula. In addition, all wilderness comments will accompany the BLM Montana State Director's wilderness recommendations to Washington for consideration by the BLM Director, the Secretary of the Interior, the President, and Congress.

Some of the letters could not be reproduced in their original form. These were retyped. Except for editing of misspelled words or obvious errors in punctuation, most comments are printed verbatim.



**1a**

United States Environmental Protection Agency  
 Region 5, Montana Office  
 Federal Building  
 201 S. Park, Drawer 10006  
 Helena, Montana 59620

**EPA**

Ref: 8M0  
 January 10, 1985

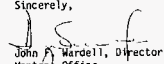
Mr. Dave Baker  
 Project Manager  
 Garnet Resource Area Office  
 3255 Fort Missoula Road  
 Missoula, Montana 59801

Dear Mr. Baker:


Thank you for the opportunity to review your Agency's draft environmental impact statement on the Garnet Resource Area Management Plan. Our comments are as follows:

1. We support the improvements in watershed conditions shown under the preferred Alternative E.
2. No mention is made in the EIS about BLM's plans for monitoring of water quality. We believe it essential that a monitoring plan be adopted which can be used to gauge the success of the various environmental controls proposed under the preferred alternative.
3. It is stated under the Forestry Section for the preferred alternate (p.110) that land adjustment programs could alleviate potential harm to watershed values in certain drainages by reducing scattered ownership. This would be true if the BLM consolidated Federal ownership in a problem drainage and by doing so removed privately held lands from the risk of poor forestry practices. However, land consolidation could also give a watershed ownership entirely over to private owners who are not constrained by BLM's mandates to protect environmental values.
4. The EIS contains little detail on the present environmental situation in the study area. We especially would prefer to see information on current water quality problems and plans to alleviate the problems.

According to EPA's system for rating draft EIS's, this statement is rated LD-2 (lack of objections - insufficient information). This rating means we have no basic objections to the course of action proposed but would prefer a higher level of detail on the current environmental situation in the study area. If you have any questions, please contact Mr. Gene Taylor in our Montana Office at 449-5486 in Helena.

Sincerely,  
  
 John A. Wardell, Director  
 Montana Office

**2a**



DEPARTMENT OF THE AIR FORCE  
 AIR FORCE REGIONAL CIVIL ENGINEER CENTRAL REGION (AFESC)  
 1114 COMMERCE STREET  
 DALLAS, TEXAS 75242

24 DEC 1984

Dave Baker, Project Manager  
 Garnet Resource Area Office  
 3255 Fort Missoula Road  
 Missoula, Montana 59801


Dear Mr. Baker:

Thank you for allowing us the opportunity to review the Resource Management Plan/Draft Environmental Impact Statement for the Garnet Resource Area, Montana.

We continue to express our support of the Bureau of Land Management in developing functional management plans for lands under its control. The Air Force concern for these management issues contains the need to retain use of existing and the establishment of future military flight training areas and routes which may traverse these areas.


Currently no Air Force air operations cross any portion of the study area. Although flight training areas, routes, and airspace requirements of the military are subject to change and do change frequently, it is not anticipated that new routes will be established in the immediate future.

We are hopeful this information is useful in your planning. If additional information is needed, our staff point of contact is Mr. Raymond Bruntmyer, (214) 767-2514, or PFS 729-2514.

Sincerely,  
  
 DON-MICHAEL BRADFORD, Captain, USAF  
 Director, Environmental Planning Division

Cy to: HQ USAF/LEEV  
 Maurice LeNove  
 Acting, State Director  
 MT State Office  
 Granite Tower  
 222 N. 32nd Street  
 P.O. Box 30157  
 Billings, MT 59107

**3a**



DEPARTMENT OF THE ARMY  
 SEATTLE DISTRICT, CORPS OF ENGINEERS  
 P.O. BOX C-3755  
 SEATTLE, WASHINGTON 98124  
 4 FEB 1985


Planning Branch

David R. Baker, Project Manager  
 Garnet Resource Area Office  
 3255 Fort Missoula Road  
 Missoula, Montana 59801


Dear Mr. Baker:

We have reviewed the draft resource management plan and environmental impact statement for the Garnet Resource Area, Montana, with respect to the U.S. Army Corps of Engineers' areas of responsibility for flood control, navigation, and regulatory functions. We have no comments.

Thank you for the opportunity to review this document.

Sincerely,  
  
 GEORGE W. PLOUDRE, P.E.  
 Asst. Chief, Engineering Division

**4a**



Department of Energy  
 Bonneville Power Administration  
 P.O. Box 3621  
 Portland, Oregon 97208

SJ March 14, 1985

Mr. Dave Baker, Project Manager  
 Garnet Resource Area Office  
 3255 Fort Missoula Road  
 Missoula Montana 59801


Dear Mr. Baker:

We have reviewed the draft environmental impact statement (EIS) on the Garnet Resource Area and offer the following comments.

The EIS is most comprehensive and does an excellent job of addressing existing as well as potential utility and transportation corridors and energy resources. The Colstrip project corridor has been well referenced on maps as well as in the narrative. We also appreciate the way corridor avoidance and exclusion areas have been addressed. This approach should greatly aid utility corridor planning.

Alternative E, the preferred alternative, appears to be a good compromise as to land available for right-of-way, land not available (only 340 acres), and land which is to be avoided. However, we see an important omission in the failure to address hydroelectric resources, both existing and potential, in the energy and mineral resources discussions. If there are no such resources, this should be stated.

Thank you for the opportunity to review the draft EIS. Please contact me if you have any questions.

Sincerely,  
  
 Anthony R. Norrell  
 Environmental Manager

cc:  
 Earl Reinsel - Region I, USFS  
 Al Evans - BLM, Billings  
 John Cheek - PP&L, Portland

5a



UNITED STATES  
DEPARTMENT OF THE INTERIOR  
FISH AND WILDLIFE SERVICE  
Endangered Species, Field Office  
Federal Bldg., U.S. Courthouse  
301 South Park  
P.O. Box 10023  
Helena, Montana 59626

SEARCHED	INDEXED
SERIALIZED	FILED
MAR 20 1985 BLM	
MISCELLANEOUS DIVISION	
EXT.	ADM.
ACC.	INS.
ACTION	

IN REPLY REFER TO:  
M.02.1.012

TO: Project Leader, BLM, Garnet Resource Area,  
Missoula, MT.

FROM: Field Supervisor, Endangered Species, Helena, MT.

SUBJECT: Biological Assessment for the Garnet Resource  
Management Plan. (GRMP)

We have reviewed the biological assessment for the GRMP and your determination of "no affect" for the grizzly bear, gray wolf, peregrine falcon, and bald eagle.

We concur with your finding of "no affect" on these Federally listed threatened and endangered species.

The bald eagle is the listed species most likely to benefit from proposed conservation measures described in the GRMP. We encourage and support your efforts and commitments to monitor this species and protect and enhance riparian habitats and food sources for this species throughout the term of the plan. In addition, we support measures available to you under the land adjustment program to acquire riparian habitats, (especially along the Big Blackfoot River) which may serve as suitable nesting or wintering habitat or which may currently serve as important components of one or more eagle breeding territories.

We are available to you throughout the planning period for planning and carrying out actions directed at the conservation and protection of the listed species and their habitats. We encourage your efforts to monitor for all these species and conduct follow-up surveys in response to sightings of listed species not normally seen in the resource area.

We appreciate your efforts to meet our shared responsibilities to conserve and protect listed species and habitats important to their survival and recovery.

*Wayne M. Dement*

6a

OPTIONAL FORM NO. 10  
MAY 1962 EDITION  
GSA FPMR (41 CFR) 101-11.6

UNITED STATES GOVERNMENT  
**Memorandum**

TO : Project Manager, Garnet Resource Area, Missoula, MT DATE: March 13, 1985

FROM : Field Supervisor, USFWS, Billings, MT (ES)

SUBJECT: Review of Draft Garnet Resource Area Management Plan and Draft Environmental Impact Statement

We have reviewed the subject statement and the following constitute the comments of the U.S. Fish and Wildlife Service (FWS). Our comments deal with what we visualize as the most significant resources for fish and wildlife resources, wetland-riparian habitats. Due to our unfamiliarity with the area, we have not commented upon other aspects of fish and wildlife resource issues.

We were pleased to see the emphasis given to riparian habitat in the DEIS. However, we feel that more needs to be done to preserve this extremely valuable habitat. As you know, the BLM, at the national level, has recognized the importance of riparian-wetland habitat, and special emphasis has been given to the protection and enhancement of these areas, in terms of general policy. On February 5, 1980, the BLM published in the Federal Register (Volume 45, No. 25, pages 7889-7895), Final Guidelines; Wetlands-Riparian Area Protection and Management; Policy and Protection Procedures. Therein it is stated that, "Riparian areas which presently or potentially support broad-leaf vegetation in arid and semi-arid ecosystems are of special management concern" (emphasis added). One of the stated objectives is to, "implement a management system to protect, maintain, and enhance all wetland-riparian areas administered by BLM" (emphasis added). The guidelines further state that BLM policy will be to, "avoid the long and short-term adverse impacts associated with the destruction, loss, or degradation of wetland-riparian areas" and, "Preserve and enhance the natural and beneficial values of wetland-riparian areas which may include constraining or excluding those uses that cause significant, long-term ecological damage." Having reviewed the Garnet DEIS, we do not believe that these guidelines have yet been adequately observed. We recommend that during preparation of the Final EIS, more adequate attention be given to wetland-riparian habitat protection needs. According to the draft, there are a total of about 6,100 acres of riparian-wetland habitat within the Garnet Resource Area. Of this total acreage, about 4,800 acres are within areas to be managed under allotment management plans (AMP) and 1,874 acres fall outside of AMP areas. Presently, approximately 4,200 acres of the 4,800 acres of riparian habitat (87%) in the AMP areas are in unsatisfactory condition and 600 acres are satisfactory. Under the preferred alternative, approximately 3,100 acres would improve to satisfactory. We could not find mention of the existing condition of the riparian habitat in the non-AMP areas. Thus,

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Buy U.S. Savings Bonds Regularly on the Payroll Savings Plan

6b

there will be at least 1,100 acres (4,200 - 3,100) of riparian habitat left in unsatisfactory condition, more if the non-AMP areas contain riparian habitat in unsatisfactory condition. Also, unclear at this point is how the BLM intends to improve 3,100 acres of unsatisfactory condition riparian-wetland habitat to satisfactory condition. The DEIS did not describe the methods that will be employed to achieve this change. To achieve this goal, while at the same time projecting an increase of 5% in licensed of ALMs, seems to us as rather overly optimistic.

80

Inasmuch as the total 6,100 acres of riparian habitat represents only 4.2% of the Resource Area, and since it is so important to fish and wildlife resources, we request that you seriously consider raising all riparian-wetland acreage to satisfactory condition. We have similar concerns for the 8 miles of unsurveyed fish producing streams in AMP areas and the remaining 38 miles of fish producing streams outside the AMP areas. We recommend that these 46 miles be surveyed and that any suboptimum stream reaches be upgraded to optimum condition.

98

We appreciate the opportunity to comment on your RMP/DEIS.

*John G. Wood*

cc: State Director, BLM, Billings, MT  
USFWS/EC, Washington, D.C.  
Regional Director, USFWS, Denver, CO (HR)  
Field Supervisor, USFWS, Helena, MT (SE)

7a



United States Department of the Interior

GEOLOGICAL SURVEY  
RESTON, VA. 22092

In Reply Refer To:  
WGS-Mail Stop 423

Memorandum

TO: Project Manager, Garnet Resource Area Office,  
Bureau of Land Management, Missoula, Montana

FROM: Assistant Director for Engineering Geology

SUBJECT: Review of draft environmental statement for Garnet Resource Area management plan, Montana


We have reviewed the draft statement in accord with the cover letter of December, 1984, from the Acting State Director.

1 The draft statement should address the potential for ground-water impacts related to the development of oil, gas, and mineral resources, and should discuss possible mitigation.

J It would be helpful to provide an explanation of the method used to assess mineral potential. For example, the terms that appear under the heading "Potential and Known reserve rating" (Table 3-4) should be defined in the glossary or elsewhere.

James F. Devine

**8a**



United States Department of the Interior  
NATIONAL PARK SERVICE  
ROCKY MOUNTAIN REGIONAL OFFICE  
655 Pelee Street  
Denver, Colorado 80225

IN REPLY REFER TO:  
17619 (RMR-PC)

MAR 7 1985

Memoandum

To: Mr. Dave Baker, Project Manager, Garnet Resource Area Office, Bureau of Land Management, Missoula, Montana

From: Associate Regional Director, Planning and Resource Preservation, Rocky Mountain Region


Subject: Review of draft Garnet Resource Area Resource Management Plan/ Environmental Impact Statement, Butte District, Montana (DRS-94/66)

The National Park Service has reviewed the subject plan and environmental impact statement. Generally, our interests are properly addressed in the document. However, we offer two suggestions:

**33** 1. The document should recognize the existence and contribution of the Grant-Kohrs Ranch National Historic Site at Deer Lodge. We suggest this could be mentioned on pages 59 and 80 under cultural resources.

**L** 2. The discussion of the "Lewis and Clark Trail" on pages 74 and 76 should recognize that Lewis and Clark's route, including this portion along the Blackfoot River, has been designated by the Congress as the Lewis and Clark National Historic Trail. The Garnet resource management plan should be compatible with the comprehensive plan for the national historic trail. A copy of that plan may be obtained from Mr. Tom Gilbert, Midwest Region, National Park Service, 1709 Jackson Street, Omaha, Nebraska 68102, telephone FTS 864-3481.

**34**



Richard A. Strait

**9a**

Lubrecht Experimental Forest  
Greenough, MT 59836  
March 1, 1985

Mr. Dave Baker  
Assistant Area Manager  
Garnet Resource Area  
3255 Fort Missoula Road  
Missoula, Montana 59801

Dear Dave:

This brief letter is in regard to the "Draft Resource Management Plan" for the Garnet Resource Area. I am writing these comments on behalf of myself and two neighboring ranchers, Land Lindbergh of the Lindbergh Cattle Company and Bill Potter of the E-L Ranch.


After a review of the plan and our question and answer session with BLM staff members a few weeks ago, we are satisfied with the preferred alternative E. We agree with the proposed elimination of livestock grazing in the bottom and east side of the Elk Creek drainage. With the intermingled land ownership pattern, the rugged topography and lack of fencing, efficient livestock management in this area is not practically cost effective. We also concur with eliminating the Wales Creek drainage from formal wilderness classification. Although this area has features that are unique to the Garnet area, the size and general characteristics of the parcel are not conducive to formal wilderness designation. However we also believe, as you have proposed, that special care should be taken in the management of this region to protect the fragile granitic soils and riparian areas. From our experience as land managers and land owners, we favor the flexibility in land management offered by a non wilderness designation.

In closing, we are gratified that the BLM not only undertook this long range planning effort but also that you have been very conscientious in involving adjacent landowners and the general public in the entire process.

Sincerely,  
*Hank*  
Hank Goetz  
Manager

cc: Land Lindbergh  
Bill Potter

**10a**



MONTANA BUREAU OF MINES AND GEOLOGY  
MONTANA COLLEGE OF MINERAL SCIENCE AND TECHNOLOGY  
BUTTE, MONTANA 59701  
(406) 488-4180

January 21, 1985

Dave Baker, Project Manager  
Garnet Resource Area Office  
3255 Fort Missoula Road  
Missoula, Montana 59801

Dear Mr. Baker:

This letter is a response to the draft Resource Management Plan/ Environmental Impact Statement for the Garnet Resource Area (12/84). Several of the staff members of the Geology and Mineral Resources Division have reviewed portions of this draft which pertain to geology and mineral resources.

**D** Copies of pages 67 and 71 with reviewer comments are enclosed. Also, it may be appropriate to mention that barite is actively being mined at two localities within this area: 1) the Coloma Creek mine is on BLM land, and 2) the Elk Creek mine is on state land. If we can provide additional information, please let me know.

Sincerely,  
*Mervin J. Bartholomew*  
Mervin J. Bartholomew, Chief  
Geology and Mineral Resources Division

MJB:jd  
Enclosures

The Bureau of Mines and Geology was established by law in 1919 as a Department of Montana College of Mineral Science and Technology, to promote efficient development of Montana's mineral resources by gathering and publishing information on the geology, topography, and mineral deposits of the state, including metals, non-metals, coal, oil, gas, and underground water supply.

**10b**

The comments that follow were transcribed from written comments submitted on copies of pages of the draft RMP/EIS. These comments were enclosed with the letter from the Montana Bureau of Mines and Geology.

On page 67 under Geology

first paragraph:

"The rock types range in age from the late Precambrian Belt series sediments (1 to 2 billion years ago), to the very recent (10 thousand years ago and less)."

**E** - Belt Supergroup not series as of 1961.  
**F** - 500 to 1500 million years ago instead of 1 to 2 billion years ago.

second paragraph

"Sedimentary rocks such as limestone, argillites, dolomites, quartzites, and shale can be found generally throughout the resource area."

**G** - should be argillite, dolomite, quartzite, AND sandstone should be included.  
**7** - Argillite and quartzite are considered metamorphosed (Pettijohn, Sedimentary Rocks)

third paragraph

"Most of the resource area was not directly affected by glacial activity."

**H** - That statement is not correct. The continental glaciers covered almost half of the area with classic glacial features in the entire northern part of the area. Glacial Lake Missoula covered a large area. Valley glaciers were common in the southern part and certainly in the glacier southern part area.

"However, glacial till can be found in moraines in Fred Burr and Upper Willow creeks."

**8** - Why do you single out this area? Moraines are well developed in many other areas.

"In the Drummond area traces of ancient shorelines of glacial Lake Missoula are visible."

**9** - Also can be seen in many other parts of your study area.

"Detailed information on the geologic structure of the Garnet Resource Area is contained in two surveys, Morrison-Maerle 1978 and Geo/Resource Consultants, Inc. 1983."

**10** - Are these available to public. If so, an address should be provided with references. If they aren't available at this time, they should be made available for the final report.

10c

On page 67 under Oil and Gas first paragraph

"This landslide is unique because of its size and presence of natural levees."

11 - Do you mean unique in this area?

On page 71 in Table 3-4

12 - What is meant by surface oil and gas potential?

- What is the distinction between Acres of Surface and Acres of Subsurface?

first paragraph under Table 3-4

13 - fluorite is misspelled, should be fluorite

second paragraph

"The Madison Limestone Formation . . ."

I - Madison Limestone or Madison Formation, not both

11a

Montana Department of Fish, Wildlife & Parks



3201 Spurgin Road  
Missoula, Montana 59801  
January 8, 1985

Mr. Darrell Sall  
Bureau of Land Management  
3255 Fort Missoula Road  
Missoula, MT 59801

Dear Darrell:

Following are the considerations of the Region 2 staff concerning the Garnet Resource Area Resource Management Plan/Environmental Impact Statement.

36 Consideration should be given to keeping the wilderness study areas roadless based on the effect of such management on the timber and mineral base.

52 The difference in timber output in the maximum wilderness alternative (c) and the two zero wilderness alternatives (A & B) is 410 mbf/yr and 2600 mbf/yr, respectively. Unless deficit logging is a high priority, putting a little of the area into wilderness would probably save the taxpayers some money as well as benefit wildlife and recreation. The maximum wilderness alternative only reduces lands available for mineral entry by 13.5%, or 27,737 acres. A small price to pay for a little solitude.

36 You project a 128% increase in acres available for grazing, however, AIM's would increase significantly only under Alternative B and would decrease under Alternatives C and D with Alternative E as the preferred, middle-of-the-road choice.

70 For the above reasons and because fish, wildlife, visuals and outdoor recreation get more consideration under Alternative C, this is the alternative we favor.

R The Department and BLM recently entered a cooperative fisheries management agreement on all BLM lands in Montana. Two of the stated objectives were directed at securing instream flows and protecting species of special concern. Neither of these areas are addressed with specific plans of action in the present 10-year management plan. Cutthroat trout are found in 47.86 miles of the 67 miles of stream on the GRA. We recommend that goals be established to develop a cooperative plan with our agency to assess the purity of those populations and to develop a management plan for the protection of those populations which prove to be pure strain. A strategy should also be developed for protection of instream flows in the most important streams in the GRA. This might also involve exercising federal reserve water rights.

11b

Mr. Darrell Sall  
Page Two  
January 8, 1985

99 The final area we feel should be addressed is in the development of economic values of the fisheries, wildlife, and recreation resources on the GRA. Economic values have not been expressed for any of the resources on the GRA and we believe they should be. Three or four jobs are created in timber or mining as a result of this or that alternative, but no mention is made of changes in the job or economic situation of the recreation and service industries. These should be given equal treatment.

Thank you for the opportunity to comment. If you have any questions, feel free to contact us.

Sincerely,

*Alan L. Stanfill*  
Regional Supervisor

JF/DW/pm  
cc: Ron Marcoux

12a



MONTANA HISTORICAL SOCIETY

HISTORIC PRESERVATION OFFICE  
225 NORTH ROBERTS STREET • (406) 444-4584 • HELENA, MONTANA 59602

January 16, 1985

Mr. Dave Baker, Project Manager  
Garnet Resource Area Office  
3255 Fort Missoula Road  
Missoula, MT 59801

Dear Mr. Baker:

Thank you for providing this office with the opportunity to comment on the Draft Garnet Resource Area, Resource Management Plan/EIS. We believe the basic approach for managing cultural resources is sound, but wish to provide you with a few recommendations to strengthen the document.

30 First, we note the assumption during the discussion of alternatives that interpretation of cultural resources is likely to decrease vandalism and other "residual" adverse impacts. While that may be the case if management and interpretation include very frequent patrols or on-site management, other forms of interpretation (general signage and directions, for example) that are not accompanied by active protective, management oversight often result in more rather than less vandalism.

31 Second, the cultural resource management procedures should be presented within the context of Section 106 of the National Historic Preservation Act, as amended, and its implementing regulations, 36CFR800. These establish the regulatory framework for Federal agencies in the proper consideration of cultural resources, and present the necessary procedures for compliance.

We also believe that the Plan should clarify the evaluation process within this context. While some sites may be evaluated based on surface manifestations, many will require literature and records research and/or subsurface testing in order to evaluate their significance within the context of the National Register of Historic Places criteria (36CFR60.6). The completion of this process is essential to insure that the significant qualities of sites are recognized and receive proper consideration, and to insure that sites which are not significant do not receive unwarranted management considerations. Once the procedures for determining eligibility are completed, a site may be placed in an allocation category. It should be noted that some sites may qualify for more than one category.

Sincerely,

*Alan L. Stanfill*  
Archaeologist/Anthropologist



13a

State of Montana  
Office of the Governor  
Helena, Montana 59620

TED SCHWINDEN  
GOVERNOR

March 15, 1985

Mr. Dave Baker  
Project Manager  
Garnet Resource Area Office  
3255 Fort Missoula Road  
Missoula, MT 59801


Dear Mr. Baker:

The State of Montana appreciates this opportunity to review and comment on the Draft Garnet Resource Area Management Plan (Plan) and Environmental Impact Statement (EIS). Your agency's cooperation and presentation of the Plan to Montana's interagency planning task force is also appreciated. The attached comments reflect the task force's review and concerns regarding the Plan.

In general, provisions have been outlined in the Plan which allow specific activities to be implemented in an environmentally acceptable manner. There are, however, portions of the Plan where the effects of implementation are not clearly identified, and where the lack of quantitative information hinders the comparison of alternative management opportunities.

We hope that the Final Plan and EIS will provide a satisfactory consideration of the state's comments on these draft documents.

Sincerely,

  
TED SCHWINDEN  
Governor

Attachment

13b

State of Montana  
Office of the Governor  
Helena, Montana 59620

MONTANA'S COMMENTS ON THE BUREAU OF LAND MANAGEMENT'S  
DRAFT GARNET RESOURCE AREA MANAGEMENT PLAN  
AND ENVIRONMENTAL IMPACT STATEMENT

The Garnet Resource Area Management Plan (Plan) is well organized and comprehensive. The Plan's emphasis on qualitative rather than quantitative information, makes it difficult to compare alternatives presented in the Plan. There are additional concerns regarding the effect of the Plan's implementation on water quality, noxious weeds, monitoring programs, wildlife, and grazing. Specific comments on these and other concerns identified by Montana's interagency task force review follow:

Timber.

- 59 While the 1976 "Environmental Analysis for Timber Management Plan" has apparently formed the basis for the 6.5 MMBF/YR timber sale goal for the Garnet Resource Area (GRA) (page 91), the total commercial forest land base on the GRA has since decreased. As a result, it is unclear on what basis the 9% increase in the harvest rate is proposed by the preferred alternative. The Plan should clarify this rationale.
- 104 The Timber Production Capability Classification (TPCC) system used on the GRA is based primarily on the physical limitations of the site, while the economics of growing timber is not considered. The economic suitability of commercial timberlands, and the profits of managing for timber on a particular site should be an important consideration in the development of the GRA management plan.
- 60 While reference is made to the GRA's mandate to provide a sustained yield-even flow of timber, it is not stated whether the proposed cut under the preferred alternative is at, or below the GRA's sustained yield level. This point should be clarified in the Plan.
- 105 On page 101, 1982 federal payments to Montana counties are listed. How these payments vary by alternative is not identified. It would be helpful if this was included in the Plan.
- 61 Page 41 of the Plan states that 1,352 acres of commercial forest land (CFL) would be harvested annually. If these lands are exclusive each year, the entire CFL in the GRA would be harvested in 78 years whereas a 100-120 year rotation period is commonly associated with forest plans in Montana. An explanation of the shorter proposed rotation period for the GRA would be appropriate.
- 69 The proposed timber program and associated road construction, will decrease non-motorized recreation opportunity and big game habitat security. Considering that the demand for this type of recreation is steadily growing, the plan should contain a commitment to a well enforced road closure program following the completion of logging activities.

13d

Monitoring.

5 Although the Plan commits to preparing specific monitoring plans for the forestry, wildlife, watershed, and range programs, it would be appropriate if the Plan identified target dates for implementation of the monitoring plans. For many of these resources, the existing data base must be strengthened or an adequate data base established, before it can be confirmed that management prescriptions should be effective. The development of best management practices (BMPs) should focus on the evaluation of an adequate data base. In addition, the development of monitoring plans should include coordination with adjacent land owners, as well as the Montana Departments of Health and Environmental Sciences (DHES), and Fish, Wildlife and Parks (DFWP). The BLM is encouraged to use the BMPs developed during the 208 Water Quality Program, and proposed guidelines from the Montana Cooperative Elk Logging Study.

Sedimentation and Water Quality.

6 The sediment production projections contained in the Plan, based on the GRA's limited data base, may not be realistic. While the projections may have been made using best available methods, a few suspended sediment measurements are not sufficient to develop long-term sediment load projections. In addition, qualitative water chemistry data should be collected. Less emphasis should be placed on sediment data collection, unless sufficient funding and time to develop a representative sediment sampling program is available.

The Montana DHES has developed the following position statement regarding sediment yield. This position statement is intended to emphasize the importance or implementation of "reasonable" BMPs.

Increases in sediment yield as a result of land management activities may be in violation of the Montana Water Quality Act, Sections 75-5-303 and 75-5-605, MCA, and the Montana Water Quality Standards, Section 16.20.633 ARM, Subsections 1 d-e and 2. Decisions on the acceptability of predicted increases in sediment yield can be made only on a stream-by-stream basis. Such decisions must take into account the stream's water quality classification, the relative value of the stream's fishery, the predicted loss of fish from the stream, and site-specific best management practices to be used in the stream's watershed. Information concerning the cumulative effects of land management activities on water quality and fish in individual streams should be made available for public inspection. Land, soil, and water conservation practices that do not give adequate protection to water quality and valued fishery resources shall not be considered "reasonable" in the context of Section 75-5-306, MCA, Subsection 2 and Section 16.20.633 ARM, Subsection 11.

C A copy of the BMPs for Silviculture and Roads from the Statewide Water Quality Management Plan: Statewide 108 Water Quality Management Planning Project, October 1979, is enclosed for your information. It would be appropriate to reference these BMPs in the Plan, as they are intended to provide additional information to land managers, and to supplement land management activities.

13c

Grazing.

- 81 The preferred alternative plans for a 35% increase in AUM's over the long-term, relying heavily on transitory range created by timber harvest activities. The most of this transitory range, however, is important elk summer-fall range. The final report of the Montana Cooperative Elk-Logging Study, in which BLM participated, concludes "...when previously inaccessible range becomes available to cattle, habitat effectiveness for elk may be seriously impaired." The recommendation also states that "Cattle use of newly logged areas which have been previously used by elk should be discouraged." The preferred alternative does not appear to have taken this recommendation into consideration.
- 82 Current BLM policy emphasizes the use of a systematic monitoring program to verify the need for livestock adjustments proposed on the basis of one-time inventory data. For example, one-time inventory data from as long ago as 1962 is being used for this purpose by BLM today. To insure appropriate adjustments, the GRA should avoid using one-time inventory data older than 5 years, and should not use data beyond 10 years old.
- P Current grazing receipts received by the GRA are only about \$10,960 annually. The appropriateness of pursuing \$585,000 in range improvements, as proposed by the preferred alternative, should be further explained in the Plan.

Weeds.

84 Although noxious weeds are targeted for control on the GRA, the proposed treatment of the problem is inadequate. The GRA is heavily infested with knapweed, requiring greater emphasis on the development of a long-term chemical and biological treatment program for its control. Without greater awareness and an effort to control the problem, continuing amounts of Animal Unit Months (AUMs) and potential reforestation areas will be adversely affected.

Noxious weed programs should be coordinated with local weed boards, as well as adjacent land owners.

Wildlife.

- 94 Although important wildlife areas were identified and discussed in the Plan, the only significant commitments to wildlife habitat improvement involve timber sales. The Plan should consider additional independent wildlife habitat improvement measures.
- 95 Road closures provide significant wildlife security in previously logged areas, but remain only a mitigation measure. Road closures will not completely compensate for losses of wildlife security cover, especially during the hunting season.
- 95 The Wales Creek, Hoodoo-Galager and Murray-Douglas areas are extremely important wildlife security areas. Although small non-commercial timber portions of these areas have been protected, timber production and associated roading is planned for many of these important areas. Additional consideration should be given to maintaining more of the existing unroaded wildlife security areas in these locations.



13e

**Mining and Water Quality:**

In addition to requirements addressed in the U.S. mining laws, federal agencies are responsible for reporting activities that might affect water quality in the state (ref. Clean Water Act, 1977, Section 401, Title IV, Permits and Licenses, Certification).

Specifically, Section 401(a)(1) states that "...any Applicant for a Federal license or permit for any activity...which may result in a discharge...shall provide the licensing and permitting agency a certification from the State..."

Acceptance of Notice of Intent to Conduct Mining Operations, Plans of Operations or issuance of some Special Use Permits that involve discharges without 401 certification may be in violation of the federal Clean Water Act.

20 With this in mind, we recommend that the BLM require applicants to provide complete documentation that state water quality permits have been secured before accepting their applications for activities on the GRA.

**Land Adjustments.**

The preferred alternative states that 126,872 acres (87%) of the resource area is to be held in retention for public values, while 18,788 acres (13%) is available for disposal through exchanges or sales. Several of the tracts identified for disposal are characterized by high wildlife values, primarily elk and deer winter range (WR):

Silver King Ridge Elk WR and Calving Area	280 acres
Montgomery Gulch Elk and Deer WR	120 acres
Mallard Creek Deer WR	40 acres
Lonetree Ridge Elk WR	400 acres
Sluice and Antelope Creek Deer WR	520 acres
Limestone Ridge Deer and Elk WR	150 acres
Gough Creek Deer and Elk WR	40 acres
Pole Creek Elk WR	200 acres
Bear Gulch Deer WR	160 acres
George and Dave Gulch Elk and Deer WR	160 acres
	2080 acres

25 The future disposal of these GRA tracts should be conditional on obtaining lands in exchange that have equal or better wildlife values. Sale of the above tracts should not be considered.

AtlanticRichfieldCompany  
14a

Public Affairs  
555 Seventeenth Street  
Denver, Colorado 80202  
Telephone 303 293 7578  
C.M. Moseley  
Representative  
Rocky Mountain Region



**VIA EXPRESS MAIL**

March 11, 1985

Mr. Dave Baker  
Project Manager  
Garnet Resource Area  
Bureau of Land Management  
3255 Missoula Road  
Missoula, MT 59801

Re: Garnet Draft RMP and DEIS

Dear Mr. Baker:

Atlantic Richfield Company would like to offer the following comments on the Draft Resource Management Plan and Draft Environmental Impact Statement for the Garnet Resource Area in northwestern Montana. Atlantic Richfield Company has several thousand State and Federal acres under lease within Missoula, Powell, Lake and Flathead Counties. In addition to our lease acreage, Anaconda Minerals Company, a division of Atlantic Richfield Company, presently has the fee mineral interest in approximately 1,000,000 acres in the counties mentioned above and extending into Sanders and Lincoln counties.

16 We have some concerns with regard to the Table 3-4, page 71 of the planning document, where BLM indicates acreage that is considered to have high, medium, or low potential for energy and minerals within the Garnet RA. Given that the RA is located almost entirely in the Overthrust Belt, we were surprised to find that BLM does not believe that there are any areas with high potential for oil and gas. In April 1982, we submitted energy and mineral evaluations to Mr. Ed Gibale of the Montana BLM State Office. At Mr. Gibale's request, we evaluated Missoula, Powell, and Granite counties for their energy and mineral potential. Our ratings showed that both Powell and Missoula counties, and a

14b

Mr. Dave Baker  
March 11, 1985  
Page 2

16 portion of Granite county, should be rated a 4 for oil and gas potential, which is the highest possible rating. A copy of the rating forms we submitted are attached for your review. Our geologists indicate that they are still very interested in this part of Montana in terms of exploring for and possibly developing oil and gas. We believe that BLM should upgrade the potential ratings for these areas to reflect our comments. If you feel a discussion of our data is necessary, please call. We would be happy to meet with you.

17 One other major problem we found in the draft planning documents is that the acreage figures used in the various alternative discussions do not add up. For instance, on page xiii under Alternative B, it is stated that oil and gas leasing will be permitted on 205,066 acres; this figure includes the federal mineral estate. Further it is stated that seasonal restrictions will be applied to 84,076 acres and NSO stipulations will be applied to 8,180 acres. The remaining 112,810 acres (which includes the mineral estate) will be subject to standard stipulations. However, Appendix O is misleading because it appears that only 19,617 acres will be subject to special stipulations and that 19,617 acres would be subject to standard stipulations. Therefore, we are confused as to which statement is correct and believe it is essential that this point be clarified in the final document.

18 We support the concept of leasing areas with minimum restrictions. However, we believe that the BLM should include a disclaimer statement in Appendix A, Management Prescriptions, under Management Goals, which points out that if it is found that certain stipulations are not necessary on a site-specific inspection basis, they should be waived. This would avoid potential conflicts in the future if it is determined that exploration could take place in a given area without the special restrictions. For instance, in Management Areas Nos. 5 and 6, it is possible that elk may not return to the same specific area every year. Therefore, if a company plans operations in a area where the elk are not expected to return that year, the seasonal restriction could be lifted for the duration of the drilling operation.

14c

Mr. Dave Baker  
March 11, 1985  
Page 3

J16  
17 In conclusion, if the recommended modifications and corrections are made to the proposed action, we believe that BLM will have prepared a reasonable Resource Management Plan. We would like more information, however, as to how BLM determined areas of high, medium, and low potential for oil and gas reserves. It is possible that changes should be made with regard to special management area proposals if it is determined that oil and gas potential outweighs those resource values which are being set aside. With the exception of the wilderness recommendation of Gulgo, it appears that the entire RA is available for leasing with a minimum of No Surface Occupancy Stipulations. As long as the seasonal stipulations are reasonably applied to allow for an adequate operating window, we can support the BLM's Preferred Alternative.

Please feel free to contact us if you would like to discuss our comments in greater detail.

Sincerely,

*C. M. Moseley*  
C. M. Moseley

Enclosures - Rating Forms

15a

Bureau of Land Mgt.

We prefer Alternative E and feel that the additional forage created by forest management practices should be made available for use by the livestock. We do not see the need for any additional areas with so many U.S.F.S. wilderness areas close by.

Bignell Ranch  
Helmville, MT

Typed for reproduction in the final EIS

16a

Blackfoot River Ranch Inc.  
Kenneth S. Coughlin  
Emmett R. Coughlin  
Ruby I. Coughlin  
Jay Coughlin  
Gene Coughlin

Helmville, Montana 59843

March 7, 1985

Bureau of Land Management  
Missoula, Montana 59801

Dear Sir,

2 On behalf of the Blackfoot River Ranch Inc. we wish to protest the proposed logging operation up Your Name Creek drainage. We feel this would affect the water shed which we rely on for our flood irrigation.

26 Also the access to Your Name Creek is limited. Private landowners have a written legal agreement which we do activate.

77 In the Blackfoot River Ranch's Five Mile grazing program the present fences maintained by us are adequate to keep cattle out. The fence between BLM and Champion ground is not adequate to keep trespass cattle out.

Sincerely,

Emmett R. Coughlin  
President

Gene Coughlin  
Vice President

Retyped for improved reproduction in the final EIS

17a

Clinton, Montana  
Mar. 11, 1985

David R. Baker, Project Manager  
Garnet Resource Area Office  
3255 Fort Missoula Road  
Missoula, Montana 59801

Dear Sir:

The Bonita, Clinton, Potomac Cattle Association prefers Alternative E from a livestock grazing view. We feel that with proper management by both the Bureau of Land Management and the cattle association, that the projected increase in AUM production should be available in less than the twenty year period, realizing that a lot may depend on monetary funding for range improvements and our capability to help out with installation of some improvements.

As a general comment on this resource management plan, we feel that there is adequate wilderness areas set aside in Western Montana already and can see no need for any additional wilderness areas on Bureau of Land Management ground.

We believe that the timber management has been okay in the past and believe that it could continue as in the past.

83 The ranchers are concerned about noxious weeds becoming more of a problem every year and more attention should be given them.

Sincerely,

Bonita, Clinton, Potomac Cattle Association  
Bernard J. Weston, Sec. Treas.

Typed for reproduction in the final EIS.

18a

Timberlands  
P. O. Box 8  
Missoula, Montana 59851  
406-258-5011

 **Champion**  
Champion International Corporation

Mr. Dave Baker  
Project Manager  
Garnet Resource Area Office  
3255 Fort Missoula Road  
Missoula, Montana 59801

March 6, 1985

Dear Dave:

Decisions made regarding the present and future management of the Garnet Resource Area are of critical importance to Champion, its employees, and the economy of western Montana. Champion is a major forest landowner in the Garnet area with approximately 120,000 acres within or in close proximity to Bureau of Land Management boundaries. Champion operates two large sawmills, a remanufacturing plant, and a large 300 million square foot per year plywood plant in the Missoula/Bonner area. Champion also operates a 1,900 ton per day pulp mill, located at Frenchtown, which is the only pulp mill in western Montana and requires both mill residuals and pulp logs from a wide geographic area for its continued operation. As a major local employer, we are very concerned about providing a healthful, satisfying and productive working environment for our employees while assuring that federal land managers do a professional job in managing the publically-owned resources entrusted to their care.

I think you and your office did a fine job in preparing the Garnet Resource Area Management Plan. I am sure it was very difficult to put together a long-range plan which addresses many management issues and combines them into a single plan. The summaries of each alternative at the beginning were especially helpful.

55 However, I am concerned over the difference in the allowable cut under Alternative B (emphasizing resource production) and the preferred Alternative E. The 18% annual reduction in volume can only be attributed to the restrictions caused by classifying 62% of the commercial forestland base as special management areas - mainly big game summer and winter range. I agree that the forests in Montana need to be managed with consideration given to wildlife management. However, timber harvesting should be viewed in a positive sense, not as a detriment to big game habitat but as a tool which can be used to improve habitat and populations. Restricted hunting seasons and bag limits are not the only management tools needed to control elk and deer numbers. You have the opportunity to greatly increase big game populations and at the same time increase timber production. Jack Thomas, when writing "Wildlife Habitats in Managed Forests in the Blue Mountains of Oregon

18b

Champion International Corporation  
 Mr. Dave Baker  
 March 6, 1985  
 Page 2

55 and Washington," stated, "It is theoretically possible to produce a 500 percent increase in the ability of the land to produce elk in a totally forested land type." To achieve this it is necessary to convert, through timber harvesting, the forested landscape into 20 percent hiding cover, 20 percent thermal cover, and 60 percent forage areas. Forage areas are the limiting factor to elk production in the totally forested landscape. He goes on to describe how the balance can be reached by both short and long rotations. Thus, I believe you need to increase timber harvesting to obtain the necessary balance of thermal, hiding cover, and forage.

S I agree clearcuts should be kept to a 40-acre maximum size for optimum wildlife management. However, I feel that shelterwood, tree selection, and commercial thinning harvest methods should not be restricted by size, but only by stand geographical and physical characteristics. Large shelterwoods do provide excellent forage, thermal, and hiding cover.

90 The security areas which will be maintained adjacent to timber sales should be put into planned harvest areas as soon as possible. This should be done when the harvested areas have again achieved hiding cover (10 - 15 years).

I also feel that the reserve distance (600') between cutting areas is rather strict. This distance could vary between 100' and 600' with no harmful effect on wildlife.

I encourage you to limit the amount of acres to be allocated to wilderness only to the 500 acres adjacent to the Oiggg roadless area. The other wilderness study areas should definitely not be considered for wilderness. Adoption of Alternative C would result in an annual timber volume loss to the forest products industries of 30% from Alternative B and a 15% loss from Alternative E. With the return of these areas to management, productivity of both timber and wildlife will be increased.

56 We also analyzed the growth and yield information used in the derivation of the harvest levels as shown in Table 2-16. All future yields are derived from empirical growth and yield curves constructed from the 1973 inventory data. This approach generally underestimates BF yields in managed stands. Also, the growth and yield equations are stratified by age, harvest regime, and stocking (for partial cut regimes) only. Variation by site quality and species is not accommodated. It is difficult to assess the effects of various restrictions without knowing the production potentials of the acres involved. Certainly not all acres really grow as a lodgepole site index = 64, which is assumed in the simulation runs. A more intensive inventory of the timber resource and estimation of future yields by a modern stand simulator would provide a better basis for guiding management of BLM lands.

18c

Champion International Corporation  
 Mr. Dave Baker  
 March 5, 1985  
 Page 3

In summary, I believe that you should approach timber harvesting with a positive attitude. As managers you must recognize that in order to manage you must be able to manipulate all the resources.

Regards,

*Chuck Seeley*  
 Chuck Seeley  
 Forest Lands Coordinator  
 kJg-CS

19a

David Dutton Dean Dutton

DUTTON HEREFORD RANCH  
 Registered and Commercial Herefords  
 Gold Creek, Montana 59733

March 4, 1985

United States Department of Interior  
 Bureau of Land Management  
 Garnet Resource Area Office  
 3255 Fort Missoula Road  
 Missoula, Montana 59801

Dear Sir:

I think your alternative plan E would be the best approach to the management of the lands.

Sincerely,

David Dutton

Typed for reproduction in the final EIS.

20a

**PC** **PineCreek Timber Company, Inc.**  
 Clearwater Unit  
 700 South Avenue West Missoula MT 59801  
 406/726-8350

February 11, 1985

Dave Baker  
 Project Manager  
 Garnet Resource Area Office  
 3255 Fort Missoula Road  
 Missoula, MT 59801

Dear Mr. Baker:

This is in response to the draft Resource Management Plan/Environmental Impact Statement (draft) for the Garnet Resource Area. As a major private owner and manager of lands within the Garnet Area, PCTC has a significant interest in BLM planning.

22 For the most part, we find that the document supports land exchange and recognizes the benefits derived from consolidated ownership. However, the final could be improved if it displayed a) lands which PCTC desires to discard and b) other lands which PCTC could acquire. Many of our lands within the Garnet Area are scattered and remotely located and are of a resource type that could be managed by BLM or another public agency.

The specific area we wish the Plan to identify as potential acquisition for purchaser exchange includes all of our lands between I-90 and Highway 200, excluding the Bonner Mtn. lands, and including our lands north and northwest of Marcus Mtn. Also, our Chamberlain Mountain lands would be included in this overall land exchange package. Refer to the RMP surface ownership map. There are no BLM lands we wish to acquire within the Garnet Area. Therefore, in order to identify lands we could acquire, we suggest that BLM work with us and other Federal agencies to pursue a multiple-party land exchange.

A consolidated land exchange proposal would comply with BLM's State Guidance document, national legislation and administrative direction. The final Plan should analyze the trade-offs of a blocked up land pattern. Such an analysis would show the benefits and savings to both public and private land managers. Our proposal would also help the BLM meet its land ownership objectives as stated on pages 1-13.

106 We request that the Plan include a statement regarding the limitations of cooperative management. Although we support its intent, cooperative management between public and private landowners is often costly and difficult to implement. This alternative to land exchange should not be considered the final remedy in solving land use conflicts between different land managers and should be stated as such in the final Plan.

K The Plan should also make it clear that access to private lands will not be

20b

Dave Baker  
page 2

**K** restricted or encumbered in any way without coordinating first with the landowner. This applies to all intermingled and adjacent private lands, especially where BLM had designated special use areas. Our comment should be included on page 42-43 of the draft.

We invite you or your representative to further discuss our land exchange proposal. Please select a place and time convenient to you. We support BLM's goal to improve public land management in the Garnet Resource Area, as stated by the State Director, and believe our proposal can contribute toward this goal. Thank you for considering our comments.

Sincerely,



JAB/seg

21a

Southern California Edison Company



P.O. BOX 410  
100 LONG BEACH BOULEVARD  
LONG BEACH, CALIFORNIA 90801

R. A. JULIFF  
MANAGER  
OF  
REAL PROPERTIES DEPARTMENT

Mr. Dave Baker, Project Manager  
Bureau of Land Management  
Garnet Resource Area Office  
3255 Fort Missoula Road  
Missoula, Montana 59811

January 8, 1985

Dear Mr. Baker:

Subject: Garnet Resource Management Plan/  
Environmental Impact Statement (RMP/EIS)-Draft

Southern California Edison Company appreciates the opportunity to comment on the above subject Draft RMP/EIS.

Based on our review and our current information, we have the following comments and recommendations for your consideration.

We are pleased to see the recognition by the planning team of future corridor needs as an issue in the RMP/EIS. Southern California Edison Company and the Western Utility Group (WUG) have identified the existing and future need for planned utility corridors that will meet future energy demands of the eleven Western States through the year 2020. We believe that corridor designation is an important and critical element of land use planning and is an important planning tool for both land managers and the utility industry.

Identification and designation of corridors in the land management planning process will assure maximum public participation insuring that all resource values are identified and considered in their selection. Designated corridors should be of sufficient width to provide the necessary routing flexibility to avoid or mitigate adverse impacts to environmentally sensitive areas located within the corridor.

While Southern California Edison Company has not identified any specific corridor requirement that would affect the Garnet Resource Area, we concur with the designation of Alternative E as being the preferred alternative. We would also agree with any of the remaining alternatives that provides for adequate utilization of utility corridors.

21b

Mr. Dave Baker

- 2 -

January 8, 1985

Thank you for inviting our comments. We hope you will give them your full consideration in the preparation of the final RMP/EIS. If further details are needed, please contact Mr. J. R. Wilson at (213) 491-2992.

Very truly yours,



JRWilson/1366f/elw

22a

Mr. Dave Baker  
Project Manager  
Garnet Resource Area Office  
3255 Fort Missoula Road  
Missoula, Mt. 59801

7 Columbine Road  
Missoula, Mt. 59802  
March 10, 1985

Dear Mr. Baker:

On behalf of the Issues Committee of the Back Country Horsemen of Missoula, I am submitting this response to you concerning RMP/EIS for the Garnet Resource Area. It was our feeling that the plan is well prepared, clear and concise document. We found the planning approach useful and easy to understand. Alternative E, the option preferred by the BLM, is generally acceptable to us. There are four particular points which we believe merit further comment.

First, we support the BLM recommendation that only one of the study areas, Quigg West, be considered further for wilderness status. The Wales Creek, Hoodoo Mountain, and Gallagher Creek areas are important roadless tracts which merit protection, but they do not possess wilderness qualities.

**32** Secondly, we believe the towns of Garnet and Coloma must continue to be protected for the purposes of both historical preservation and recreational use. We want to compliment the BLM for the level of protection which has existed during the past year. At the same time we would strongly urge that the personnel doing this work not become the first victims of budget reductions in the future.

**83** Thirdly, we believe the plan lacks a strong weed control emphasis. While recognizing that weed control is a complicated and expensive business, we believe it represents an important direction that planning and management cannot avoid. Spotted knapweed, leafy spurge, and others represent a very serious threat to these public lands. We believe an active control plan involving various control methods should be considered.

**78** Finally, as backcountry horse users we have problems with fences. Since grazing is an important use of the area, we understand that fences are necessary. We also see them as a factor which often limits the horse use when such a limitation is unnecessary. To solve this problem we urge the BLM to include in the plan a standard that an unlocked gate be included in every fence line at a distance no greater than a one mile interval. In addition a gate should be present on any major trail. We believe this is economically feasible and will allow multiple use.

Thank you for the opportunity to respond to the proposed plan. We would like to be informed of the details of the final version.

Sincerely,

Philip T. Bain

cc: Nancy Chandler, President, 4401 S. Ave. W., Missoula  
Jim Archer, Issues Chair, 1230 W. Kent, Missoula  
Bill Brown, Issues Chair, 10025 O'Brien Creek Rd., Missoula

Typed for reproduction in the final EIS.

23a

To the attention of the Bureau of Land Management, Committee for the study of the Resource Management Plan and Environmental Impact Statement:

I am writing in response to the Garnet Resource Area Management Plan. We are members of the Five Valley Four Wheelers, a recreational organization.

We enjoy traveling the old back country roads, jeep and fire trails and exploring old mine roads and sites. The roads we are interested in, require little or no maintenance, and what repairs are needed could be done by volunteer groups such as ourselves. We could provide erosion control, brush and dead fall removal and non-major repairs, required to keep a jeep road open for 4x4 travel.

The type of road we prefer to travel and enjoy the forests on, are quickly disappearing from the useable forests. These roads are being destroyed by new logging roads, they are being closed to year long travel, or they are being permanently then allowing the area to be turned into wilderness. We feel there is already enough WILDERNESS in the state of Montana and it is time to consider using some of the lod established jeep trails for the motorized recreation.

User conflict is an expression we hear at almost every meeting we attend and read in most articles that are written concerning forest use. We have little or no conflict with other users because of the time of year we use the area, compared with the time of year others use these areas.

A little common courtesy and mutual respect could solve most conflicts by the users anyway.

**O** During the management plan development we would like you to take old roads into consideration when planning a new logging road or other roads. We would like to see the old roads left passable and close the new ones if necessary.

**67** A few specific roads we are interested in are: The Cap Wallace Road up to the old ridge road, the to the Chamberlin meadows area via the original road; The Chamberlin Creek Road out to Scotty Brown Bridge, the Road across the burn, The Wales Creek Road, The Elevation Mountain Fire Road, Deep Creek Road, Douglas Creek Road down Weasel Gulch to Rattler Gulch.

We want to thank you for your consideration and if you are interested in any of our organization doing any volunteer work on any of the above mentioned roads, feel free to contact either Mike or Kathy Whitman at 728-8033 or write to us at 420 West Central.

Mike Whitman, Pres. Five Valley Four Wheelers  
Kathy Whitman, Sec. Five Valley Four Wheelers  
420 West Central  
Missoula, Montana 59801

24a

Garnet Resource Area  
Resource Management Plan

The Garnet Preservation Association supports management alternatives which will preserve, protect, and promote the ghost town.

We feel the town must be stabilized if it is to be publicly presented as a historical site. Our Association's involvement is to provide private funding to this stabilization/preservation goal. Our only real method of raising this funding is through involvement of the general public at the town site.

On this basis we must support Alternatives A or E which provide for access and continued maintenance of this historical resource.

Ivan L. Leigland  
President  
Garnet Preservation Association

Typed for reproduction in the final EIS.

25a

Written Testimony of Tom Sewell representing the Montana Wilderness Association.

I speak for my personal viewpoint as well as that of M.W.A. At least I assume I am still representing M.W.A. officially.

We support Alternative C, the maximum wilderness alternative, for the Garnet Management Plan.

**36** The small areas proposed for wilderness should be so designated simply because they are the only areas suitable on the entire Resource Area. They are so small that there should be no opposition to their protection. The wildlife habitat may be managed by the BLM even if the areas become wilderness. The mineral potential of the areas are low.

**37** The Hates Creek, Hoodoo, and Gallagher areas must receive the protection only wilderness can give them.

Thanks,  
Tom R. Sewell  
M.W.A. Council Member  
5131 Koch Ln.  
Florence, MT 59833  
777-2222

Typed for reproduction in the final EIS.

26a

National Wildlife Federation

12 Gardner Park Dr.  
Bozeman, MT, 59715  
March 6, 1985

Mr. Dave Baker, Project Manager  
Garnet Resource Area Office  
Bureau of Land Management  
3255 Fort Missoula Road  
Missoula, MT. 59801

Dear Mr. Baker:

The National Wildlife Federation takes this opportunity to submit comments on the DEIS of the Garnet Resource Area RMP. The National Wildlife Federation is the nation's largest private citizens' conservation education organizations with affiliate organizations in all 50 states and two trust territories. The NWF and its state affiliates now have more than 4.3 million members and supporters with a broad spectrum of interest in natural resources and their professional management. The NWF state affiliate in Montana is the Montana Wildlife Federation, with dues-paying members in more than 4,000 Montana households.

**P** The Federation has reviewed the Garnet RA DEIS in detail and has found a number of areas where the plan needs substantial improvement. As an organization whose members are interested not only in wildlife but in the proper management of all natural resources, the Federation submits the following recommendations. Page references relating to these recommendations will be given where appropriate. The Bureau's preferred alternative, Page xiii, discusses proper range management, which the Federation certainly supports, but the proposed range improvements fail to make economic sense to us. The cost of the proposed range improvements is \$986,000 for a project total of 8,000 AUM's. On Page 102, the plan indicates that the AUM rate in 1984 was \$1.37, or about \$10,960 from all AUM's per year. This indicates that BLM grazing fees, the only income to BLM produced by the grazing system, returns only a fifth of the cost to the taxpayer of the interest, figured at 10 percent a year, each year. This is hardly cost-effective.

**72** The Federation believes the present AUM rate to be unrealistically low and a burden to the taxpayer. A return of less than \$11,000 a year on an investment of more than a half-million dollars in range improvements would force any private businessman out of business in short order.

**75** The agency appears to overlook the fact that if the range is in poor condition, which it is, due to over-grazing, the beneficiary of this cheap grazing is being very heavily subsidized at taxpayer expense.

**P** If the agency is truly concerned about improving the condition of the range, we suggest the first step would be to assess the cost of the range improvements to the permittee who caused the range condition deterioration in the first place. This is not to suggest that the agency is not equally responsible for the poor condition of the range. Conversely, BLM also estimates on Page 123 that "hunter days" on the Garnet RA generate some \$573,241 to the economy in indirect benefits. If wildlife were subsidized at the same rate as grazing on the Garnet RA, this would mean an expenditure in excess of \$72 million on wildlife during the period of the plan.

**103** The Federation has interviewed a number of hunters and other

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-2-

27 recreationists who use the Garnet RA and we are inclined to believe your "visitor use levels" are low. For instance, the plan estimates that 200 persons visited the Hoodoo Mountain area each year but information given us indicates that more people than that hunted the area in 1984, not counting other recreational users. The same can be stated for the Gallagher Creek area where BLM's plan puts the annual public use figure at 100 visitors (Page 269) and our checks with users of that area indicate that more than 40 hunters used that area on the opening day of the 1984 big game season alone.

85 What appears to be the greatest incongruity in the plan is that it is one thing BLM describes some of the elk and deer habitat in the Gallagher Creek/Hoodoo Mountains and Wales Creek areas as prime and critical, then apparently refuses to give these wildlife values any real consideration in the proposal. This is particularly disturbing to citizens interested in wildlife and proper resource stewardship; areas described by BLM as "key elk areas" are, a few pages later, scheduled for roading and clear-cutting; practices which can only destroy these same wildlife values.

Q While the Federation strongly supports proper range management, there is little in the plan to suggest that BLM has proper range management in mind.

96 On Page 9 under "Livestock grazing," there is no listing of costs of range improvement and the return on the investment. In any economic analysis, this information must be included. Proper protection of riparian zones is most relevant to the plan's discussion of grazing. Throughout the plan, BLM indicates the riparian areas are in poor condition. BLM's stated solution, voiced several times, is that "intensive grazing management is projected to improve all of the sub-optimum habitat through increased bank stability and cover."

However, there is no mention of excluding cattle from riparian zones by fencing and, since it is not mentioned, we must assume that fencing is not in the proposed plan. Nor is any mention of cutting AUM's to protect riparian habitat. What is left, then? This makes the use of "intensive grazing management" just so much rhetoric.

101 We might also point out that any AUM's allotted are a public, not a private resource. That is to say that the general public has as much right, vested or otherwise, to the public lands as any adjacent landowner. To suggest, as the plan does on Page 231, that because an individual owns private land adjacent to public lands, he has special rights to that public land is philosophically and, probably, legally wrong. If the allotments are considered by BLM to be in private rather than in public ownership, then such "ownership" constitutes a form of welfare to a privileged minority.

Over-grazing appears to be perpetuated in this plan. However, equally threatening to the values of this public resource are BLM's plans to grossly over-harvest timber on these public lands.

53 There is serious concern on our part that BLM has amassed a long and rather pathetic record on the Garnet RA in its timber management program. A short drive through and past BLM lands that have been logged shows very poor regeneration of timber. Has BLM completed any follow-up studies to determine how well logged-over BLM lands in the RA have or actually are reforesting? If BLM is

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53 using anything other than actual field data on regeneration to estimate regeneration rates as part of its maximum sustained yield allowable timber harvest, then its proposed cutting schedule is faulted before the exercise even begins.

If BLM will realistically assess the regeneration capability and the productivity of its lands scheduled for logging, the cut probably should not exceed 3 million board feet in the next 20 years, not the 6.7 million board feet proposed.

100 According to information on Page 91, BLM has sold 229,329 million board feet of timber since 1944 for a total price of \$4,772,988, or about \$21 per million board feet. BLM also states that it plans to harvest 6,700,000 board feet per year.

If the same average prices prevail over the 20-year cut period, this would mean about \$136,500 per year in timber receipts.

On Page 123, BLM's plan states that hunter days on these same BLM lands were worth nearly \$799,500 per year, plus almost \$573,241 in other income generated to the economy in incidental benefits.

76 While the impacts of increasing cattle grazing by some 28 percent on areas already badly over-grazed, under the preferred alternative, make little sense from an economic standpoint, the increase of 6,637 AUM's called for in the token environmental alternative is just as ludicrous.

We have separated logging from roading in the discussion up to this point because we want to focus attention on two large BLM units called the Gallagher Creek/Hoodoo Mountain area and the Wales Creek area. Both these areas have been described in the plan as key elk areas and both have been classified, to date, as primitive areas.

These are the only remaining Garnet Mountains units within the Garnet RA which are large and which contain critical wildlife habitat. Both are heavily used by hunters from Missoula and Helena as well as other Montanans engaged in other forms of outdoor recreation. As such, they are an important public resource if they remain in their current condition.

100 Clearly, from BLM's own figures, wildlife and hunting generate more income to the public than does timber harvest and grazing in the Garnet RA, at least on publicly-owned lands. A strong case can be made that the plan is not economically sound from the grazing and logging standpoint. It can also be argued that should BLM manage those lands under agency control in this RA which still contain good wildlife habitat for wildlife, not logging and grazing, that good wildlife would produce more public benefits. Thus, the entire thrust of the plan needs revision.

73 Under "management guidelines" on Page 173 (Item No. 1), it is clearly demonstrated that big game should be given priority on all ranges, based on BLM's own analysis. It follows that livestock grazing should be removed from all big game winter ranges.

42 As previously stated, our reading of the plan shows that BLM intends to heavily log the two larger units. This will ultimately destroy all of their unique wildlife values, and these are public values on publicly-owned lands. One of the reasons they have retained a high value for wildlife is that they are largely unroaded. Under the proposed plan, the only areas to be left unroaded are those with little timber potential and little value to wildlife. The plan calls for, in fact, the ultimate destruction of all of the significant wildlife values. It also demonstrates that the plan's authors had little concern for and

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42 gave no consideration to protecting those public values.

The plan calls for the construction of 210 miles of logging roads over the next 20 years just in these two units. The planned intrusion will completely destroy the elk hunting values thereon.

The Federation cannot see how it will be possible for BLM to adhere to the Cooperative Elk/Logging Study (BLS-SES-P&P) guidelines while building 210 miles of logging roads into these areas to cut the projected 134 million board feet of timber.

39 The treatment accorded wilderness study, a mandated responsibility of BLM and other federal land management agencies, is shabby at best. In addition to removing these two areas from wilderness study status, the plan calls for roading and logging them, automatically negating any further consideration for protection. The wilderness study areas should remain in their present status until the Congress decides on their future.

43 BLM's "throw-away" to its mandated wilderness responsibility is one 520-acre parcel which virtually is all talus slopes and scree hillsides, with low wildlife values. The same mindset apparently applied in BLM's proposal for the upper Gallagher Creek area where the only portion to be left uncut is an area of rock slides.

40 The Federation has difficulty with Pages 291-300. The method of presentation is deceptive. The listing indicates that all wilderness study areas on the list are going to be added to the wilderness system. This is anything but the case.

To handle this subject more objectively, BLM should list the total number, size and location of wilderness study areas, the total agency recommendations for wilderness, the total acreage of federal lands in Montana and the total acreage of all lands in Montana. The percentage of wilderness existing and proposed should be calculated for the entire state, not just the federal lands therein.

The table (P-5) on Page 299 is adequate but we suggest deleting 41 the National Park Service wilderness areas. These lands already are in national park classification and not subject to development or resource extraction. Thus, they really are not part of a full wilderness discussion. We also recommend that Forest Service recommendations be included in such tabulations as soon as their forest plans become public in the near future.

N In connection with the roading issue, the plan's errata on Page 327 (reference to Chapter 3, Page 88) recommends that listings under vehicle roadways on the Page 88 map be changed to foot trails. This change also should apply to Pages 30, 39, 237 and 268. There are no roads in the Gallagher wilderness study area.

25 Under the section on land adjustment, the Federation is completely familiar with this BLM program and all of its ramifications. Under the plan, many parcels of land are scheduled for sale or trade which have high wildlife values. These include:

- Beacon Area - 120 acres - high in value for elk and deer winter range, with more than 500 elk using the area extensively. S8,T9N,R9W.
- George Gulch - 40 acres - High-use elk and deer winter range. S14,T9N,R9W.
- Bear Gulch - 160 acres - high value deer winter range. S24,T10N,R9W.
- Pole Creek - 200 acres - More than 100 elk use this winter range. S11 & 13, T12N, R11W.
- Georgi Creek - 40 acres - Good elk, deer winter range. S14, T10N, R11W.
- Limestone Ridge - 160 acres - Elk, deer winter range. S22, T11N, R12W.

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-5-

25 Sluice Creek and Antelope Creek - 520 acres - all of this area is good deer winter range. S4,S8E,T5N, R15W.

Lone Tree Ridge - 60 acres total - more than 100 elk use this area as prime winter range. S20, 30, T5N, R15W.

Millard Creek - 40 acres - good deer winter range. S6, T5N, R15W.

Montgomery Gulch - 120 acres - elk, deer winter range. S6, T6N, R15W.

Silver King Ridge - 280 acres - elk calving and winter range, with 300 elk using it. S20, T9N, R14W.

The Federation would not object to trading these lands for "locking" purposes but only if the lands to be acquired had substantially greater wildlife values. Failing to negotiate a trade under these conditions, BLM should follow the State Director Guidance priorities and transfer title to the Montana Department of Fish, Wildlife and Parks.

88 It is obvious to anyone knowledgeable about wildlife to note that most of the non-BLM lands in the Garnet RA which had timber at one time now have severely reduced wildlife values. Lands owned by the Champion Corporation and Burlington-Northern and those managed by the Department of State Lands have, in almost every case, been clear-cut. Other privately-owned lands are, in most instances, over-grazed. BLM retains the relatively few areas in this BLM resource area that still contain moderate to high wildlife values. Thus the direction BLM takes with its management of the agency's holdings in this resource area will determine the future of the area's wildlife resource.

The National Wildlife Federation requests the Bureau of Land Management to specifically address each of the points raised in these comments and to take action in the preparation of the final EIS on the Garnet RA accordingly.

Please keep us informed of your actions.

Sincerely,

*Charles J. Griffith*  
 Charles J. Griffith  
 NWF Regional Executive  
 No. Rockies Region



27a



**BITTERROOT-MISSION GROUP  
SIERRA CLUB**  
BOX 7315 MISSOULA, MONTANA 59607  
March 13, 1985

Mr. Dave Baker  
Project Manager  
Barnet Resource Area Office  
3255 Fort Missoula Road  
Missoula, MT 59801

Dear Mr. Baker:

The Bitterroot-Mission Group of the Sierra Club wishes to express sincere thanks for this opportunity to comment on the Draft Barnet Resource Management Plan and to submit the following comments.

We were impressed with the thoroughness of the analysis and the balanced presentation of issues that we found in the RMP. Nevertheless, we find it necessary to disagree with certain conclusions. For the most part our disagreements stem from differences in judgment concerning the weight that should be placed on certain resource values and the importance of these to the public.

Specifically, we cannot agree with the choice of Alternative E as the preferred alternative, because we do not believe that it gives sufficient importance to the important resource values of wilderness and wildlife habitat.

Concerning wilderness we would like to make the following points:

1. Surveys show that the public demand for wilderness and the opportunity for primitive recreation in wilderness is increasing more rapidly than was expected only a few years ago. As a consequence many wilderness areas are being very heavily used. For example, the Lewis and Clark Forest reports that there were 69,000 days of wilderness recreation use in the Rocky Mountain Division of the Forest last year, although in 1981 it had been estimated that the wilderness areas in the Division could handle only 47,000 days of wilderness recreation per year. We do not believe that the increased public demand for wilderness recreation was adequately recognized in the draft RMP.

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"Not blind opposition to progress, but opposition to blind progress."

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2. Relatively small wilderness areas, such as Wales Creek, Hoodoo Mountain and Gallagher Creek will become increasingly important as the usage of the larger and longer established areas continues to increase. These areas will provide opportunity for solitude that it will be harder and harder to find in the more heavily used areas.

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3. We do not believe that the fact, as stated in Appendix D, that "there is no need to designate these BLM study areas as wilderness solely to balance ecotype diversity" is a valid argument against wilderness designation. There are many wilderness values. Preservation of a balance and diversity of ecosystems is only one, although we deem it an important one.

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4. We do not believe that the establishment of special management areas provides adequate protection of wilderness values, primarily because such administrative designation carries no guarantee of permanence. The only method for assuring permanent protection of the wilderness resource is statutory designation.

44

5. It is well recognized in the draft RMP that management that would allow the surface character of the WSAs to be disturbed would result in irreversible degradation of their wilderness qualities. We do not believe that the short term benefits that might be realized by thus degrading the wilderness resource are sufficient to justify the long term loss of a lasting and irreplaceable resource that will become increasingly precious with the passage of time.

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6. Finally, we do not believe that the fact that there are large designated wilderness areas in western Montana relatively close to population centers is in any way relevant to an evaluation of the wilderness qualities of the BLM WSAs. These areas are not the property of Missoula or Great Falls residents, nor are they the property of the state of Montana. They are part of the federally owned public domain and belong to all citizens of the United States. The fact that they are located in Montana is incidental and irrelevant.

Concerning the impacts of the Preferred Alternative on wildlife we would like to make the following points:

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1. Western Montana is a unique area that enjoys a special life style in large part because of its rich resource of wildlife. Thousands of present day Montanans took up residence here in order to enjoy this abundance of wildlife by hunting and fishing, wildlife photography, or simply viewing and observing when they go afield. Additional thousands visit Montana each year in large part because of this special attraction. Any action that tends to diminish this unique wildlife resource degrades Montana and should not be taken unless there is a compelling reason that dictates such action. We do not find such compelling reason demonstrated in the draft RMP.

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2. THE SUMMARY OF THE IMPACTS OF THE ALTERNATIVES ON RESOURCES, page 112, states that Alternative E will result in serious long-term adverse impacts on wildlife on 27,040 acres. We do not believe that such action is in the best interests of Montana or the United States. The meager amount of consumptive resources that might be produced by the proposed development actions is not sufficient compensation for such long-term degradation of the precious wildlife resource.

68

3. Chapter 3 of the draft RMP appropriately recognizes the importance of the Recreation Resource provided in the Barnet Resource Area and makes special mention of the Blackfoot Special Management Area and the total of 104,140 acres of cooperatively managed walk-in areas. The value of these areas depends in very large part on the opportunity provided to enjoy the wildlife resource found there. The fact that the major concentrations of BLM administered public land is adjacent to these walk-in areas places a special responsibility on the BLM to maintain and enhance this wildlife resource. In our view, this responsibility is not adequately recognized by any of the five Alternatives. Even Alternative C provides for management activities that would have serious long-term adverse impacts on fish and wildlife on 22,400 acres. We recognize that management would seek to improve wildlife habitat on substantial acreages due to intensive grazing management and management as wilderness. Nevertheless, it appears that the net result is certain to be a reduction in the wildlife resource.

Preference among Alternatives

Of the five Alternatives presented we would have to choose Alternative C, the Protection Alternative. However, we do not find it entirely acceptable, because of the net adverse impacts on wildlife as discussed above.

We hope that in revising the draft RMP a greater emphasis can be placed on wildlife which we believe to be the most important resource to be found on these publicly owned lands, and that an appropriate management alternative that will recognize the important value of the wildlife resource can be developed.

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We trust that these comments will be given serious consideration. They are offered in the spirit of constructive criticism in an attempt to represent what we perceive as the best interests of both Montanans and United States citizens wherever they may live.

Sincerely yours,  
*James F. Curtis*  
James F. Curtis  
Group Chair

28a

March 10, 1985

Dave Baker  
Garnet Resource Area Office  
Bureau of Land Management  
3245 Post Mileoula Rd.  
Mileoula, MT 59901

Dear Dave:

I wish to make the following comments on the Resource Management Plan for the Garnet Resource Area:

Alternative "E" is a reasonable Multiple Use proposal.

The process for determining management areas and the criteria for managing each is commendable.

I do not have on-the-ground knowledge of the lands in the Garnet Resource Area so cannot comment on your management area allocations but do approve the process and believe it will provide concerned individuals a means of monitoring management. The integrity of the plan will be known when we see it implemented.

Thank you for the opportunity to review the E.I.S. Staffs cooperation is appreciated.

Sincerely,  
*Donald Adrich*  
Donald Adrich  
410 Woodworth  
Mileoula, MT 59901

29a

Greetings

44 Regarding the Garnet Resource Area, 10 year management plan.

Upon my initial study, a large portion concerns wilderness recommendations. Unfortunately I find your terminology generally negative towards this concept. Throughout the plan "wilderness" is seen as a detriment to development. What you haven't gone into enough is how logging, gas, oil, and mineral consumption have been and will be degrading to wildlands, people, animals, plants, air, and water. This country was mostly "wild" up until the turn of the century. Continued, radical, degradation of ecosystems will ensure the destruction of the biosphere. Let's face it; without long-term (200 plus years) considerations, this planet is going to die. Our planetary resources are finite.

65 Since the BLM is determined to design a plan for the next 10 years, I have some recommendations.

1. Wales Creek, Hoodoo Mt., Gallagher Creek, and Outg West should be designated "wilderness", as well as all roadless areas in this state. The road between Hoodoo Mt. WSA and Wales Creek WSA should be eliminated. Roads bring weeds, and decrease elk populations due to hunting pressures and overkill. According to the Montana Dept. of Fish, Wildlife, and Parks, "... 60 to 80 percent of the elk population will decrease if the "roadless areas" of the state are roaded". Large ecosystems must be protected so all wild species have the opportunity to survive and migrate. Why not enhance areas for the reintroduction of past animals?

Bring back the grizzly!

Even though there seems to be a large supply of wilderness in the GRA (your opinion), more will benefit the growing populations.

1980 - 86,000  
2005 - 147,000

Nonpolluting - low impact industries such as recreation, hunting, fishing, and outfitting, etc. brings a lot of direct and indirect revenue into this state. Tourism (people oriented) is the type expansion that I consider acceptable. Habitat protection and access are concerns raised by conservationists, as well as recreationists.

72 2. Grazing should be reduced overall for several reasons.

a. It's another subsidy by the government (tax payers).  
b. Cows and sheep compact soil and eat plants down to stubble which doesn't allow for complete regeneration; too much, and we have desert.

3. If existing commercial forests are managed properly; thinning, select cuts, and regeneration (natural or hand plant), there is no need for opening up more forest lands. There are approximately 12 million acres of "commercial forests" in Montana. Sustained yield can work, if the "speed factor" of the timber industry would abate. Right now there is an over supply of timber logs throughout the northwest at the mills. In other words the timber market is slower than the past... flooded.

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66 Select cutting of small blocks with temporary roads and/or sky lines, and helicopters should be used. Access and rehabilitation (planting) must be paid for by the logging contractors in full. No more timber deficits! Again, the fewer vehicles, the less transport of weeds (no spray).

1 4. Oil and gas exploration and development cause more in immediate and direct pollution from heavy machinery, spills, and pipelines next to open pit mining. Again, the market is flooded. Prudhoe Bay oil/gas is exported. Our domestic uses have tapered. We may need some 200 years down the road. These resources are finite.

44 Animals and water quality are usually disturbed, prime grizzly habitat is now being threatened near Holi Creek. Seismic blasting pushes deer, elk, bear, etc. away from their traditional rangelands. Pristine water from existing "wilderness" areas will become polluted from runoff and "minor" spills, when developed on boundaries, (Rocky Mt. Front). The list goes on. "Buffers" from development should be established.

19 5. Mineral exploration usually ruins most areas with the use of mills, tailings, heavy metals, and truck traffic; the impact of this activity in most cases is destructive. "boom and bust" mentality prevails when it comes to this industry. Promises of short lived economic benefits are not beneficial. The Troy mine (state-of-the-art) is a prime example. Any mining activity should be viewed with caution, EIS's, and many public hearings. Again, animal and water, and air will suffer for many generations if large mines are opened. Reclamation does not repair the damage of displaced animals and people's well-being.

44 Conclusions  
The main problem with our society is the notion of consumption. Resources are either nonrenewable (oil, gas, mining) or slow to regenerate (forestry). Our planet is at a point when it is necessary to look 200 years ahead. The "boom and bust" mentality has to be replaced with respect to future generations.

Wilderness promotes multiple use in all aspects; from recreation for all of us to inspiration and low impact industries.  
Wildlands help us regain our ancestral ties to the land. They have their own value; some call it "intrinsic". There is too little of it left, 3 percent in Montana (less in the continental 48).

Moderating industrial development will ensure a steady supply of resources for the future. "Wilderness" and roadless areas are the last remaining vestiges of ecological sanity. We as a world population must look at the big picture, and ask if we can continue at our present rate of resource consumption. Remember, you are working for us!

Sincerely,

Merrill Bradshaw  
Black Sheep Ranch  
520 Agency Rd.  
Jocko, MT 59821

Typed for reproduction in the final EIS.

30a

*Feb 25, 85*

*Dave Baker, Project Manager  
Garnet Resource Area Office*

*I have looked over your Resource Plan for the Garnet Area. I like to know more and I feel that Alternative E is the best proposal I have read. I also feel that the Grand Range Road should be kept closed during the winter and the Gate at Bearcamp Hill be closed during the winter.*

*Yours  
Allen Cottingham  
P.O. Box 463  
Sulby Lake Montana*

31a

March 7, 1985

Comments on the Garnet Draft Resource Management Plan:

1. Outfitter and guide permits. I concur with the recommendation of not issuing any permits for the area. The land base is relatively small, fairly accessible, and a fair number of people hunt the Garnets already. There does not appear to be any reason for permitting an outfitter to operate in this area.
- 107 2. I believe there needs to be a stronger recognition of the ecological systems at work in the Garnet Range. As in most of Western Montana this area developed through both frequent, low intensity fires and catastrophic fires. Except for only a couple of MA's, the use of fire is not spoken to. Use of fire to stimulate browse and basically keep the vegetation from losing vigor should be addressed in more MA's except maybe the riparian areas. The wildlife areas (MA6,6) should have fire used and used extensively to maintain or enhance wildlife values.
- 54 3. The Garnets have been a perpetual haven for spruce budworm for at least the last 4-5 decades. Much of this can be attributed to fire suppression and subsequent heavy understory stocking of susceptible species (DF, AF). Anytime timber harvest occurs it should be designed to move away from these species to the extent ecologically possible.
- 3 4. Within MA 1, protection of the stream bank for stability purposes should be paramount. The stability of the streambanks can have long reaching effects on timber harvesting upstream.
- 64 5. Road closures. With the access that is presently available throughout the Garnets it seems that there should be a very strong stand taken on future roading and re-analyzing present roads for closure. The addition of all new roads should be set up for closure, especially during hunting seasons. Many should be closed year round. Closures would serve two purposes, 1) to reduce wear and tear on the roads, especially the local logging roads, and 2) to provide the isolation security that the big game needs.  
The amount of open roads in the King Mountain area is a real scary situation if it was to be on areas any larger. There is tremendous hunting pressure in this area, mostly by driving roads, but it allows for very little security area for big game. Many of these roads should be closed, especially during hunting season.
- 89 6. In MA 4 the security cover is described as 200 trees/acre, 8' tall. It seems rather difficult to apply one standard to all situations. Does the criteria fit areas that are on 40-60 percent slopes when viewed from across the drainage? Maybe it would be better to just say provide security cover and let the biologists evaluate individual sites as to their meeting those objectives.
- 108 7. I am encouraged to see your proposal to use herbicides for site preparation. In the areas of the Garnets pinegrass is a very strong vegetative competitor and must be dealt with decisively to achieve appropriate conifer regeneration. The use of herbicides is a viable tool and I encourage you to pursue their use when needed.

*Allen Christophersen*  
Allen Christophersen  
1 Virginia Drive  
Missoula, MT 59803

32a

P.O. Box 7911  
Missoula, MT 59807  
7 March, 1985

Dave Baker  
Project Manager  
B.L.M. Garnet Resource Area Office  
3255 Fort Missoula Road  
Missoula, Montana 59801

Dear Mr. Baker:

Thank you for the opportunity to review the Draft RMP/EIS for the Garnet Resource Area. I have studied the Draft document and support your preferred Alternative E for resource management. Alternative E should provide a balanced resource management objective for the various management areas.

I am glad to see that your geology/mineral resources data base has been greatly expanded in recent years and that this information has been carefully considered. Although the historic mining districts have been the focus of mining activity, it is likely that mineral resource discoveries can be made in other areas of BLM land. Discoveries will occur in response to market demands and technologic advancements in exploration and mining. It is important, therefore, to maintain a substantial multiple use land base in which such discoveries and mining can occur.

I look forward to reviewing the RMP/EIS final document.

Sincerely,

*Bruce E. Goff*  
Bruce E. Goff  
Geologist

33a

February 28th, 1985

Mr. Dave Baker,  
Project Manager,  
Garnet Resource Area Office,  
3255 Fort Missoula Road  
Missoula, Montana 59801

Dear Mr. Baker:

Re: RMP/EIS for Garnet Resource Area.

As recent as two weeks ago, a group of nine Canadians enjoyed a nine day vacation snowmobiling in the Seesley Lake area, returning for the fourth year. Each year we had heard stories about the superb snowmobiling in the Garnet Range of mountains. Finally this year six of our group made the trip into the area and spent a day snowmobiling the many excellent trails in the area. Of course and additional bonus for us was the opportunity to visit the old Ghost town of Garnet - a most interesting and worthwhile restoration project.

28 Upon a quick study of the draft re the above, we would like at this time to register our favorable opinion towards the Preferred Alternative E which appears to be a multi-use Plan. However, we would not like to see the snowmobiling opportunities in the Garnet Area decreased in anyway.

Thank you for your attention and to the betterment of snowmobiling, we remain,

Yours truly,

*Barry and Audrey Donnelly*  
Barry and Audrey Donnelly  
212 - 64 Avenue, N.W.  
Calgary, Alberta, Canada  
T2K 0M2

34a

Box 229  
Drummond, Montana 59832

8 March 1985

Darrel Gell, Area Manager  
Garnet Resource Area Office  
3255 Fort Missoula Road  
Missoula, Montana 59801

Dear Mr. Gell:

32 In regard to the Garnet Resource Management plan, I'll go along with Alternative E, but I do not think there is enough emphasis on the protection of the town of Garnet.

May I strongly urge the necessity of a full-time guard? As of now, we're on the shaky ground of funding for six months, with the possibility of the Garnet Preservation Association paying for the rest of the time. The GPA does not now raise enough funds to pay a guard adequately, and I do not see how this situation will change in the future. Leaving Garnet without a guard for six months is similar to a bank which has its doors and vault locked half the time.

You people at the Bureau of Land Management in Missoula have been most helpful in the past. I am optimistic that you will continue to be so in the future.

Thank you very much.

Sincerely,

*Frank J. Fitzgerald*  
Frank J. Fitzgerald

35a

Mr. Dave Baker  
Garnet Resource Area  
3255 Fort Missoula Road  
Missoula, Mont. 59801

3-13-85

Dear Dave, et al.:

Thank you for the opportunity to comment on the GRA RMP. I know how much time and effort went into the document and I support most of the preferred alternative. I would like to submit the following comments as a concerned private citizen.

- 79 First of all, I believe that in Management Area 11, no grazing should be allowed. (1) This is a very small amount of land and its withdrawal would not affect AUMs significantly on any one lease. (2) Cattle destroy cultural sites, both physically by knocking down cabins, etc., and visually by their presence and "leavings". (3) Cabins, mine shafts, and other historic sites present a hazard to cattle. Historic sites should either be fenced or no grazing should be allowed around them. This is particularly true of Garnet and the other major mining ghost towns (i.e., Reynolds City).
- 57 Secondly, exactly where did the timber base data (CFL) come from? During what years did the foresters inventory the timber base? The Garnets have very slow-growing trees and I believe that 7,000 mbf is not a sustainable yearly harvest in the Garnets. Harvesting at this level would remove old-growth and push the entire resource area towards single-age stands. I also believe that more emphasis must be placed on post-sale regeneration, slash removal, and closing of roads. Clean up the old mistakes and problem areas before new ones are created.
- 35 I also firmly believe that all of the Anderson Mountain west face above the Moore cabins and north face above the Mountain View Hill Road should be in Management Area 11. Clear-cuts on Anderson Mountain have already destroyed numerous historic sites and the archaeological survey for the proposed timber sales on Anderson Mountain was inadequate. From personal experience, I know of many sites not even mentioned in the archaeological report that would be lost if timber sales proceed as planned. Anderson Mountain and the activities on it were an integral part of Garnet's history and will become an important cultural and recreation resource if left intact. Anderson Mountain has many hiking and cross-country ski opportunities that should be protected. The timber values are not high enough to justify removal of the timber particularly on the upper mountain. Any timber cutting anywhere near Garnet should take into consideration telemark and trail cross-country skiing possibilities and visual resources. Require loggers to provide skiable slopes by removing or reducing in height stumps and slash.
- 58

35b

- 32 I strongly support cultural and recreation resource management as outlined in the preferred alternative. Continued funding for Garnet Ghost Town, the Blackfoot and Clark Fork rivers management, and trails and walk-in hunting area management is essential to probably the most valuable resource in the Garnets over the long run. This should continue to be recognized in management of the GRA.
- 45 I object strongly to recommending almost the entire amount of WSAs be dropped from wilderness consideration. I feel that it is inconsistent to list old-growth timber as a reason for nonwilderness classification. This type of area is not presently "well-represented" in the NWPS and the WSAs in the area would be excellent for changing this.
- 46 Wales Creek. This is an area that would be an excellent addition to the NWPS. Many other people feel this same way as shown by the substantial pro-wilderness public comment received when it became a WSA. I disagree that the roads into the area affect the naturalness of the area - you can get away from the roads and experience a pristine experience. In fact, you could even get lost there! As far as minerals go, if there were any valid and mineable deposits there, the area would not be as untouched as it is now.
- 47 Gallagher Creek. This is a beautiful area with marginal timber resources when you consider the road building costs associated with accessing the old-growth timber. In particular, Mannix Park and the wilderness and wildlife values associated with it can only be protected by formal designation. I object to any use of recreation benefits derived from road building being used to justify the road building in this or any other area in the Garnets. There is an over abundance of roaded recreation opportunities in the Garnets.
- Hoodoo Mountain. Another area where wilderness designation would be best to protect the unique values of the area. Upper Cottonwood Creek is as wild as an area you can find and should be wilderness.
- 48 Once again, I believe it is inconsistent with FLPMA and the Multiple Use Act to violate pristine areas such as Wales Creek, Gallagher Creek, and Hoodoo Mountain by roading and logging marginal timber areas. There is a lack of substantial mineral resources in these areas and public comment supports recommending these areas, especially Wales Creek, for wilderness designation. I heartily endorse your recommendation that Quigg West be designated wilderness.

35c

Finally, I support fully funded land management practices as put forth in Appendix B, "Best Management Practices". The GRA has well-qualified foresters who should stipulate that these practices be part of all contracts. Funding should be sufficient to allow for responsible timber sale layout and monitoring and site preparation and replanting after the sales.

Thanks again,

Doug Habermann  
2629 West Babcock  
Bozeman, MT 59715

Typed for reproduction in the final EIS.

36a

DAVE BAKER -PROJECT MANAGER  
GARNET RESOURCE AREA OFFICE  
3225 FORT MISSOULA, MONTANA 59801

DEAR DAVE,

AFTER REVIEWING THE BLM GARNET AREA MANAGEMENT PROPOSAL, I WOULD LIKE TO MAKE A FEW COMMENTS.

AS A SNOWMOBILER AND A CROSS COUNTRY SKIER, I CAN APPRECIATE THE VAST AREAS THAT WE HAVE TO ENJOY THESE SPORTS ON BLM LAND.

I AM IN FAVOR OF USING ALL PUBLIC LANDS FOR LIVESTOCK GRAZING AND COMMERCIAL TIMBER HARVESTING. WESTERN MONTANA NEEDS ALL OF THE JOBS IT CAN GET TO CONTINUE TO PROVIDE WORK FOR ITS PEOPLE. WITHOUT LUMBER AND RANCHING, THERE WOULD BE MANY SERVICE-RELATED PEOPLE OUT OF WORK. IF PEOPLE CONTINUE TO PUSH FOR MORE ACRES OF WILDERNESS LANDS, IT IS GOING TO TAKE AWAY MORE BADLY NEEDED JOBS IN THE MISSOULA AREA.

- 29 I WOULD LIKE TO SEE A FEW CHANGES IN THE SNOWMOBILE-CROSS COUNTRY SKI TRAILS AT GARNET. AS THIS AREA GETS SOME MONEY TO GROOM SNOWMOBILE TRAILS FROM THE STATE GAS TAX, I FEEL IT IS TIME THAT CROSS COUNTRY SKIERS PAY A USER FEE WHEN EVER THEY SKI AND ENJOYGROOMED TRAILS. IN SOME STATES WHERE SKIERS USE GROOMED TRAILS, THE SKIER PAYS A LICENSE FEE WHICH GOES INTO FUNDING FOR GROOMING SKI TRAILS.

WE THE SNOWMOBILERS ARE FORTUNATE TO BE ABLE TO SNOWMOBILE ON PUBLIC LANDS. I HOPE YOU WILL ALWAYS CONSIDER THE RECREATIONAL SNOWMOBILER AS YOU MAKE FUTURE FOREST PLANS.

SINCERLY

MARVIN HAMMER  
4705 MILLER CREEK ROAD  
MISSOULA, MONTANA 59803

37a

February 13, 1985

Statement for the Hearing on the Garnet Resource Area Resource Management Plan/EIS

Much has been accomplished in preserving Garnet since the seventies when the Bureau of Land Management began to protect and restore the buildings.

It is a unique site, and even though many of the buildings are no longer there, enough remains so people can understand how the people lived and with the aid of available pictures they can visualize what the town was like.

Montana's ghost towns have rapidly disappeared; so few remain. Garnet has a special setting in the Garnet Range.

Thousands do visit Garnet every year, so it is important that it be protected by a year-round guard and the existing buildings be stabilized and more restored.

*Nolan W. Hammond*

Garnet Preservation Association  
 Montana Ghost Town Preservation Assn.  
 Western Montana Ghost Town Preservation Assn.  
 Author of Garnet, Montana's Last Gold Camp



38a

2-20-85

I feel that Alternative E is the best workable solution. I am opposed to any more wilderness areas.

John Hollenback

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39a

Charles Kay  
 542 South 4th West  
 Missoula, MT 59801  
 Feb. 26, 1985

Mr. Dave Baker  
 Garnet Resource Area Office  
 3255 Fort Missoula Road  
 Missoula, MT 59801

Dear Mr. Baker:

This letter and its attachments are my comments on BLM's draft management plan/EIS for the Garnet Resource Area. My comments deal mainly with the eastern end of the Garnet Range - in the Hoodoo Mountain - Gallagher Creek - Mannix Park areas since I've had personal experience in that area for over 20 years. I also have BS and MS degrees in wildlife management, so my comments reflect both my personal experience and professional expertise.

85 As I discuss in my detailed comments which are attached, I am opposed to BLM's preferred alternative because, in my opinion, BLM has put too much emphasis and resources into timber harvest, road building, and livestock operations and not enough into wildlife and wildlife habitat.

BLM's handling of the Hoodoo Mountain and Gallagher Creek WSAs exemplifies their lack of concern for wildlife and especially elk.

86 Over the past 20 years, I watched all the private land surrounding these WSAs become roaded and logged. These WSAs are an island of vital escape cover that is completely surrounded by a sea of roads. The elk have been driven from the lower areas back into the mountains as the logging roads facilitated hunter access. The elk hunting now is little more than a run-and-gun-them situation which forces the remaining elk back into the WSAs. But if the WSAs are roaded and logged as proposed by BLM there will be virtually no escape cover for this elk herd. The Elk Logging Study of which BLM was a part, demonstrated that elk must have adequate escape cover.

63 Since the entire area surrounding them have been extensively roaded, I recommend that the Hoodoo Mountain and Gallagher Creek WSAs be designated as wilderness to provide adequate escape cover for this elk herd. Moreover, I suggest that the Hoodoo Mountain and Gallagher Creek WSAs be combined into one wilderness area to afford more protection to the elk and for ease of management. Presently a "jeep" trail is all that separates the two areas and this road (which I have often driven) can be closed off without degrading the wilderness qualities of the area as the "jeep" trail is little more than a wide horse trail.

38 Furthermore, I recommend that this wilderness area be expanded to the south (see attached map) to (1) protect all of Gallagher Creek, (2) protect more BLM land, (3) ensure more escape cover. This proposal

39b

38 would require BLM to trade other BLM lands for four sections of private lands - Sec. 7, 13, 17, and 19. This would form a core wilderness area of 22,200 acres of escape cover for elk and other big game animals.

24 BLM's draft plan calls for trading unattached BLM lands for a blocking up of lands for easier management. This proposal would block up BLM lands and therefore make management easier. By trading for the lands BLM would also acquire the rest of Mannix Park. BLM already controls about half of Mannix Park and this land trade would protect this area. Mannix Park is over one and one-half miles long and it is the largest grassland park in the area. Mannix Park has also been subjected to relatively light grazing pressure and is in good to excellent condition, and as such, it is unique; I know of no other comparable areas in Montana.

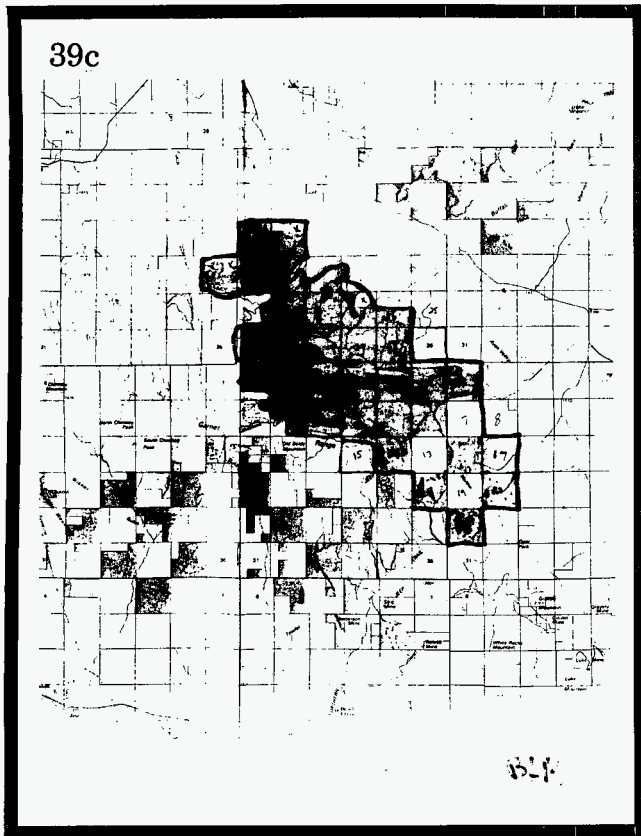
I've discussed this proposal with former BLM biologist Mr. Rob Hazlewood. Mr. Hazlewood supports this concept and he has indicated to me that prior to his transferring from BLM, he contacted the private landowners in question and they were agreeable in principle to trading these lands for other BLM lands. Twenty years ago, Mannix Park was heavily used by elk, but then an old sheep herders trail was widened out to provide access for 4x4s. Since that time, few elk use the park. With BLM ownership and wilderness protection this could again be excellent elk habitat.

I thank you for your time and for your consideration of my comments. I am,

Sincerely yours,

Charles E. Kay

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Detailed Comments on BLM's  
draft Garnet Resource Area Management Plan and EIS

**39d**

**P** 111 I support proper range management but BLM's proposed range improvements under their preferred alternative do not make economic sense. BLM states that cost of range improvements would be \$685,600 for a project total of just over 8,000 AUMs. On page 102, BLM's 1984 rate per AUM was \$1.37, 8,000 x \$1.37 = \$10,960 per year. \$685,600 cost of improvements at even 10 percent interest = over \$8,000 per year just in interest on the range improvements. BLM grazing fees do not even recover one-fifth the cost of the interest let alone the return of the capital investment. I am opposed to any range improvements that are not cost effective e.g., pay for themselves. If the range is overgrazed and needs measures to improve its condition - the permit holder should pay all those costs, after all it is the permit holder who overgrazed our public lands in the first place.

**Q** 9 Under "livestock grazing" the cost of range improvements and return on that investment should be a prime consideration. It presently is not listed.

**53** 92 Has BLM done any follow up studies to determine how well old logging areas are actually reforesting? I know of several clear-cuts in the area that have no to little tree regeneration. If the logged over lands are not actually growing trees then the maximum sustained yield allowable timber harvest must be reduced. BLM should include field data on actual reforestation rates or old logged areas.

**72** 102 "Livestock grazing" BLM's grazing fees should be increased to reflect the actual market value of that resource. The present system is little more than a hidden government subsidy or welfare for the cattle industry. In the present era of budget cutting all parties should pay their fair share.

**100** 123 On page 91 BLM states that since 1944 they have sold 228,329 mbf of timber at \$4,772,988 or about \$21 per mbf. BLM also states that they plan to harvest 6,500 mbf/year or \$21 x 6,500 = \$136,500 per year in timber receipts. On page 123 BLM states that the 30,000 hunter days on BLM lands were worth nearly \$800,000 per year plus nearly \$600,000 more in indirect benefits.

From BLM's own figures, clearly wildlife and hunting generate more income from BLM lands than do timber harvest or cattle grazing. Thus BLM's primary objective should be to manage our lands for wildlife habitat not logging or livestock. Hence, BLM should revise this entire plan accordingly.

**39e**

**96** 167 Exactly how is BLM going to improve riparian habitat? Is BLM going to fence the cattle away from the streams? I doubt if anything else would work.

**73** 173 Under management guideline item #1, as demonstrated by the above economic analysis - big game animals should be given priority on all ranges. On all winter ranges no livestock grazing whatsoever should be allowed.

**39** 175 I object to BLM's releasing WSA lands for roading and logging after they have completed this plan. WSAs should be managed in the present condition until Congress acts on their long-term status.

**74** 210-211, 215 Range Allotment 7216 is prime big game winter range where no grazing should be allowed. This allotment should be canceled and the area fenced to prohibit livestock. The number of AUMs should not be increased (pg. 215).

**101** 231 Public BLM AUMs should have no value to a private rancher. This is a public resource. If a private rancher's private land decreases in value because he is excluded from BLM lands, so what? - he has absolutely no personal claim to public lands that belong to all people. This is just another form of welfare for a privileged minority. I suggest that this consideration be deleted from the BLM plan.

**27** 265 BLM's figures on visitor use of the Hoodoo Mountain area should be revised upward from the stated level of 200/year, since there were more people than that in there last hunting season.

269 Same comment as above - BLM says 100/year in Gallagher Creek - yet I met over 40 people in there on the opening day of big game season in 1984.

**40** 291-300 I find this section extremely deceptive. Listing all the WSAs gives the false impression that all those areas are going to be added to the wilderness system - which they are not. BLM should list the total WSAs, total agency recommendations for wilderness, total federal lands in Montana, and total lands (all) in Montana. Percent wilderness should be calculated by the entire state not just government lands.

**41** 299 Table P-5 is good but I suggest deleting the NPS wilderness areas - because those lands are already in a National Park and not subject to resource development - they are not really part of the wilderness question. Should also include the FS recommendations as the Forest Plans come out.

**N**

**102** 303-308 Under BLM's analysis all size cattle operations are not economically viable. If this is true, why then or how do those people remain in the cattle business?

**39f**

**87** 309-314 Elk Logging Study Guidelines. These guidelines are excellent, what I question is BLM's ability to follow these guidelines to protect the elk at the same time BLM plans to log our lands and build over 200 miles of new road (pg. 115). My professional opinion is that it is impossible to do both at the same time. Under BLM's draft plan, I believe that elk and other game animals would be severely impacted.

**M** 327 Errata under Chapter 3 pg. 88 BLM says to change the vehicle roadways on the map on page 88 to foot trails. This also applies to pgs. 30, 39, 237, 268. There are no roads in the Gallagher WSA.

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40a

Russell W. Lawrence

February 13, 1985

BML 6000 N  
Missoula, MT 59802  
(406) 543-9229

I'm here to express support for the BLM's Historic Preservation efforts in Garnet and to thank them for including it in their management plan.

Management plans, though, often are pie-in-the-sky documents, reflecting the best of all possible situations, given full funding. We all know that nobody gets full funding any more, and that programs get cut or cut back because of it. I'd like to suggest that the historic preservation efforts are substantially different than range or forestry or even recreation programs, and that they should receive priority in funding considerations.

When timber sales are delayed due to budget cuts, the trees, generally, will continue to grow. Rangeland, watershed and wild-life habitat can be managed conservatively in the absence of full funding; recreation can continue whether it is managed or not, but a historic building that is lost due to neglect or lack of protection can't be replaced. The Garnet historic area attracts a great deal of traffic, and deserves to be recognized as a major historic and recreational destination, but as such it requires the constant attention of a permanent caretaker, and that requires a funding commitment that can't be touched.

The cooperative agreement with the GPA is the other keystone that holds Garnet together, and they must be considered together. The present level of funding is insufficient without GPA support, but GPA's efforts are not enough, and won't be in the near future, without BLM's cooperation, support, and funding.

The GPA is working hard to hold up its end of the agreement, and speaking on behalf of the thousands of Garnet visitors every year. I strongly support the full funding of all the historic preservation activities identified in the plan, to ensure that everyone's efforts combine for the greatest good in Garnet.

32

Hearing  
EXHIBIT  
5

41a

Garnet Resource Area  
Resource Management Plan

The Garnet Preservation Association supports management alternatives which will preserve, protect, and promote the ghost town.

We feel the town must be stabilized if it is to be publicly presented as a historical site. Our Association's involvement is to provide private funding to this stabilization/preservation goal. Our only real method of raising this funding is through involvement of the general public at the town site.

On this basis we must support Alternatives A or E which provide for access and continued maintenance of this historical resource.

Ivan L. Leigland  
President  
Garnet Preservation Association

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42a

March 11, 1985

Darrell Sall  
Area Manager  
Garnet Resource Area  
3255 Fort Missoula Road  
Missoula, MT 59802

Dear Mr. Sall:

I am very concerned about the future of Garnet ghost town, and I reviewed the Garnet Resource Area Management Plan (Draft) to determine what actions you propose for the townsite. I was glad to see that you recommended full implementation of the Garnet Ghost Town Management Plan, which includes the goal of maintaining a permanent full-time caretaker for the town.

32

As you know, Garnet is a non-renewable cultural resource, highly susceptible to damage from natural causes or vandalism. The highest priority for the protection of Garnet is the funding of the caretaker position. I hope that when the Garnet Resource Area Management Plan is implemented, funds will be permanently assigned to supporting this position.

I strongly support the BLM's historic preservation efforts, and I am glad that the Bureau has identified Garnet for protection and preservation. I urge you to commit the necessary funds to follow through completely on your management recommendations.

Sincerely,

*Jean M. Matthews*

Jean M. Matthews  
1031 Cherry St.  
Missoula, MT 59802

43a

February 13, 1985

Statement for the Hearing on the Garnet Resource Area Resource Management Plan/EIS

I lived in Garnet from 1917 to 1927 and my father, Sam Adams, came to Garnet in the late 1800's. He owned a general merchandise store. Part of our house is still standing. My mother had the Post Office in this house in the early 1900's. My father was also the owner of a number of mines. The blacksmith shop where Billy Liberty shooed so many horses still stands for people to see.

I am very happy to see what the BLM has done to restore so many buildings which otherwise would be gone.

People from all over, including Germany, visit Garnet every year and really enjoy seeing a ghost town, reliving for a few hours what it was like back in the early days.

I think it is wonderful that the BLM restored a couple of buildings that are being rented for sleeping quarters for snowmobilers and skiers.

I hope the BLM will be able to continue as they are now.

Garnet is a very dear place to me.

*Mary Jane Adams Miller*

Garnet Preservation Association  
Western Montana Ghost Town Preservation Assn.

Hearing  
EXHIBIT  
4

44a

Feb. 1, 1985

Dave Baker, Garnet Resource Manager

I'll introduce myself. I'm May Nelson, ranchers wife. Grew up at Bonita, have spent a good deal of time in the mountains in and around the Garnet area.

I'm writing in regard to the draft made for the Garnet Resource Area. I can live with Alternatives A or E.

I don't believe in wilderness areas, because it's public land. Only people like me, that can ride a horse or walk are entitled to see and enjoy these places. How many people do these or are able to do these? Any public land should be open to everyone or closed to everyone. With a trail wide enough cycles, snowmobiles, 4-wheelers, horses, backpackers, or skiers could enjoy it without any harm to the environment. What's a worn path in an area this big? Game make paths, they're not unsightly. On the contrary to what a few believe, none of these motorized things hurt or spook the game as much as a person on foot. I know. Game hear motorized vehicles and just move off these trails or roads and stand and watch you go by. Using a little common sense anyone that has spent much time in the mountains knows you can't just take off up mountains, over rocks and fallen trees to chase the game or tear up the earth.

I can go along with the no mining, logging, or powerlines, etc. for these areas. Most people that go to the mountains go because they love and respect it. I think of all the people that would love to see these places and can't because they are not able. The Bob Marshall is fine and I enjoy it, but it's enough for our area.

As for designating certain areas for cross-country skiers, snowmobilers, horsemen, or motorized vehicles I'm against for the same reason. We are adults or the majority of us are. We're not kids from the other side of town or Chicago east-side, west-side gangs. There is no reason why everyone can't use the same trails or roads and get along. If we can't, close them to everyone. I've been roaming these mountains for 30 years on horseback, cycles, foot, snowmobiles, and vehicles and never run into anyone disagreeable. And as long as people know this ground is for everyone they'll learn to live with it and get along as we have in the past or they'll go to a private area. But, let it be the people's choice.

Logging is a must, but I'm for selective cutting. I don't like the looks of clear-cuts unless the timber is infested. I agree with closing most of these logging roads. A hunter should be a sport and walk. There are enough roads open for hunters that can't walk. (I hate hunting.)

Cattle grazing is fine where there are allotments and not over grazed. As a ranchers wife I know you don't find many ranchers that do over graze, it's not to their benefit. We graze no public ground.

44b

And after having this outlined, I see where BLM might not be managing Western Montana but am sending this anyway. A note on the good side, I'd rather BLM manage this area than Forest Service.

Sincerely,

May Nelson  
Drummond, Mont.

P.S. Forest Service signs that say, "Snowmobiles only, if there's snow", makes me sick.

Typed for reproduction in the final EIS.

45a

BLM 2-20-85  
R.E. GARNET RESOURCE AREA.

DEAR SIRs:

AS A LAND OWNER IN R13W, T13N, AND R12W T13N, AND ALSO AN OWNER OF A NUMBER OF UNPATENTED MINING CLAIMS IN THE SAME AREA, I AM DEFINATELY OPPOSED TO A WILDERNESS AREA AS DETAILED IN ALTERNATIVE #C. THIS WOULD INTERFERE WITH ANY FURTHER DEVELOPMENT OF MINING ACTIVITIES THAT I AM INTERESTED IN PURSUING IN THE FUTURE. ACCESS TO THE PATENTED CLAIM COULD ALSO BE HAMPERED. IT WOULD ALSO BE A TERRIBLE WASTE OF THE OVERMATURE TIMBER STAND IN THE AREA.

A MULTIPLE USE PLAN SUCH AS ALTERNATIVE E WOULD BE MORE ACCEPTABLE THAN ANY OF THE OTHERS AS LONG AS IT IS HANDLED AS EXPLAINED.

Steve A. Stapp  
Box 80  
HELMVILLE, M.T.  
57843

46a

2-20-85 BLM Lands - Comments  
Drummond - Garnet RMP

23 I. Small Tracts - Isolated

These should be sold. No way to fence them, police them, or tax them. They are often surrounded by one-owner private land and he uses them without paying taxes.

36 II. Wilderness

Areas designated (8) on the maps are too small for wilderness and much of it has been logged, grazed, or prospected and is not true wilderness.

71 III. Grazing

By all means continue but with good range management. How about a program of rotation where areas get a rest every few years?

14 IV. I notice that the small tracts near Pioneer are not classified for mining (14). The scene of the discovery of gold in Montana should be recognized!!

15 V. Oil and Gas

Lease all of it. Allow drilling anyplace. Some oil and gas would pep this country up!

VI. Timber and Big Game

Continue production. Mature forest is poor for game. Cut over areas produce more food for game.

Frank Trask, Jr. - Deer Lodge

Typed for reproduction in the final EIS.

47a

March 12, 1985

Sir:

I strongly support Alternative E of the Resource Management Plan for the Garnet Resource Area as presented by the Bureau of Land Management, Butte District.

Sincerely,

Fred Weaver

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## RESPONSES TO COMMENTS AND LETTERS

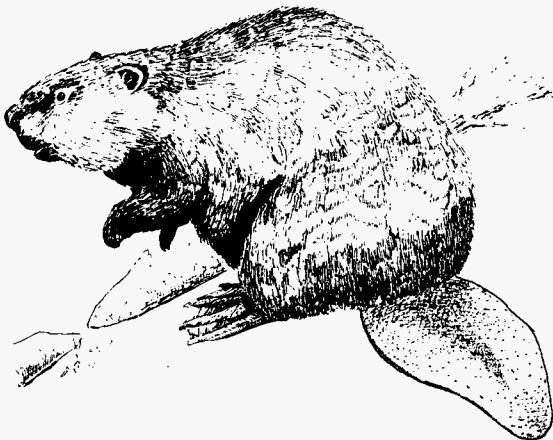
### Water

**Response A.** Page 60 of the draft RMP/EIS provides an overview of water quality monitoring. Also, a Resource Monitoring and Evaluation Plan is entered into this final EIS as Appendix U. (Response to letter 1.)

**Response B.** Generally, water quality in the Garnet Resource Area (GRA) is good. A number of locations have problems involving sediment production, that are being addressed through use of management plans, site-specific activities, and implementation of regulations as appropriate.

The problem areas and proposed actions are listed in Table 3-2a and incorporated into Chapter 3 page 63 of the draft RMP/EIS, with text change noted in Chapter 8. (Response to letter 1.)

**Response C.** The draft Garnet RMP/EIS states on page 18 that "Best Management Practices (BMP), as developed through the Montana Statewide 208 Study, will be used to control nonpoint sources of water pollution resulting from forest management practices and similar activities." Appendix B includes a list of general BMPs which are considered most applicable to typical situations found in the area. The specific BMPs to be used for actual onsite mitigation or prevention of water quality impacts would be selected from the full range of BMPs available, including those contained in the October 1979, *Statewide Water Quality Management Plan*. See text changes in Chapter 8. (Response to letter 13.)



**Response 1.** The draft RMP/EIS incorporates by reference the Butte District Oil and Gas Environmental Assessment (USDI, BLM 1981) which addresses in part the impacts to groundwater and mitigating measures relating to oil and gas leasing. Mitigation of impacts to groundwater resulting from development of mineral resources generally requires implementation of the 3809 regulations and keeping spoil piles away from the 100-year floodplain. (Response to letter 7, 29.)

**Response 2.** The BLM uses Best Management Practices (techniques for controlling sediment production, for protecting vegetation, etc.) to meet its goal of maintaining water quality and stream channel stability in logged areas. Therefore, adverse impacts to the Yourname Creek watershed are not anticipated. Refer to Appendix A and Appendix B of the draft RMP/EIS for further information on this subject. Also see the monitoring plan in Appendix U. (Response to letter 16.)

**Response 3.** Management goals and guidelines for Management Area (MA) 1 emphasize stream stability. Little or no development will occur in these areas. (Response to letter 31.)

**Response 4.** There is no hydroelectric development on the public lands. Potential for small hydroelectric resources is low. In addition, such development would not have a significant effect upon allocation of resources and was not recognized as an issue during the scoping process.

Existing federal power reservations will be handled outside the RMP/EIS process by withdrawal review. The withdrawal review presently is taking place bureauwide. See page 20 of the draft RMP/EIS. (Response to letter 4.)

**Response 5.** Resource and program monitoring is an ongoing activity, although the Garnet RMP/EIS is the first land use plan for the GRA which formally incorporates comprehensive monitoring provisions (see Appendix U). Implementation of new monitoring actions and changes to existing monitoring will begin immediately following plan adoption, subject to funding and other constraints.

The Best Management Practices proposed for adoption in the Garnet RMP/EIS (see Appendix B) are derived from the 1978 State of Montana 208 Study.

Minor modifications have been made to make these BMPs more useful in light of local conditions and needs.

All BLM management activities, including monitoring, are coordinated with adjoining landowners and other agencies to the extent needed. For example, the BLM utilizes a basin analysis approach for GRA water quality management which includes assessment of cumulative impacts on lands of all ownerships. The GRA is currently working with the Forestry Division of the Montana Department of State Lands (Missoula office) to develop a process for insuring that all landowners or agencies in a basin cooperate in evaluating cumulative impacts for basin-wide management plans.

The final recommendations from the Montana Cooperative Elk Logging Study are proposed for adoption in the Garnet RMP/EIS (see Appendix S of the draft RMP/EIS). (Response to letter 13.)

**Response 6.** The BLM began developing a water quality data base for the GRA in 1978. This effort has been focused on acquiring information which could be used primarily to monitor the effects of timber harvest practices. Such information includes annual runoff and peak discharges, sediment production, and chemical constituents such as nitrates. Trace and heavy metal analysis is used on a case by case basis. Discharge and suspended sediment measurements are made often enough to provide data for use with existing runoff and sediment models. (See Appendix U for additional information.)

In the BLM/State of Montana Memorandum of Understanding (USDI, BLM 1980), the BLM has committed itself to maintain water quality and stream stability. In addition, the GRA has committed itself to maintain soil productivity. (Response to letter 13.)

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## Geology and Minerals Including Oil and Gas

**Response D.** The reference that barite is actively mined in the Coloma and Elk Creek areas will be incorporated on page 67 of the draft RMP/EIS. The text change is shown in Chapter 8. (Response to letter 10.)

**Response E.** The reference to Belt series is not applicable and will be changed to supergroup on page 67 of the draft RMP/EIS. The text change is shown in Chapter 8. (Response to letter 10.)

**Response F.** The time period for Precambrian Belt supergroup will be changed to 600 to 1600 million years on page 67 of the draft RMP/EIS. The text change is shown in Chapter 8. (Response to letter 10.)

**Response G.** The reference to sedimentary rocks will be modified and sandstone added on page 67 of the draft RMP/EIS. The text change is shown in Chapter 8. (Response to letter 10.)

**Response H.** The statement on glacial activity will be clarified on page 67 of the draft RMP/EIS. The resource management plan analyzed resources on public lands in Missoula, Granite, and Powell counties. The text change is shown in Chapter 8. (Response to letter 10.)

**Response I.** Either Madison Formation or Madison Limestone Formation is acceptable; Madison Formation is preferred and used in the final EIS. The text change is shown in Appendix T. (Response to letter 10.)

**Response J.** The definition of the terms appearing in Table 3-4 of the draft RMP/EIS are as follows. Low potential refers to an area where very few geologic characteristics favorable for the accumulation of a given resource are known to be present. Medium potential refers to an area where some geologic characteristics are present that are favorable for the accumulation of a given resource. High potential refers to an area where many geologic features are present that indicate the occurrence of a given resource. These definitions will be included as a footnote to the table on page 71 of the draft RMP/EIS and noted in the text changes in Chapter 8. See also Response 16. (Response to letters 7, 14.)

**Response 7.** Argillite and quartzite are considered to be sedimentary rocks which are weakly metamorphosed. (Response to letter 10.)

**Response 8.** The Fred Burr and upper Willow Creek moraines were singled out because they are the most striking examples on public land in the GRA. (Response to letter 10.)

**Response 9.** Again, the reference and emphasis is on public land in the GRA. The effects of glacial Lake Missoula can be seen in many other parts of western Montana, but the analysis centered on public lands administered by BLM. (Response to letter 10.)

**Response 10.** The Morrison-Maierle and Geo/Resource Consultants surveys are available for public review at the Garnet Resource Area Office, 3255 Fort Missoula Road, Missoula, Montana 59801. (Response to letter 10.)

**Response 11.** According to the *General Geologic Report, Blackfoot Planning Unit* (Morrison-Maierle 1978), "The natural levees are the only known features of their type present in Montana." (Response to letter 10.)

**Response 12.** Acres of surface is the total acreage where the BLM administers both the surface and subsurface estates. Acres of subsurface is the total acreage where the surface estate is privately owned with minerals reserved to the federal government. (Response to letter 10.)

**Response 13.** Phosphate and fluorite are misspelled on page 71 of the draft RMP/EIS and will be corrected in the final EIS (see Appendix T). (Response to letter 10.)

**Response 14.** MA 14 consists of active or recently active mineral extraction and processing operations on BLM-administered land. The Pioneer tracts have not been active for years and the Pioneer townsite is on private land. If nearby public land tracts are actively mined in the future, they will be designated as MA 14. The Gold Creek area is recognized on page 67 of the draft RMP/EIS as an important mining district. (Response to letter 46.)

**Response 15.** Under the preferred alternative, the lands closed to leasing and lands with stipulations prohibiting surface occupancy are minimized (520 and 8,180 acres respectively). The rationale for these protective measures is addressed in Chapter 2 and the impacts are addressed in Chapter 4 of the draft RMP/EIS. (Response to letters 46, 14)

**Response 16.** Table 3-4 reflects ratings compiled from several sources. This data was complemented with BLM's knowledge of the resources. There has been considerable interest in leasing, but little interest in exploring the lands addressed in the RMP/EIS. The larger tracts of public land are unlikely targets for exploration due to intrusive or extrusive igneous activity. These areas differ considerably from those presently being explored in western Montana. See also Response J. (Response to letter 14.)

**Response 17.** Acreage figures in Appendix O refer only to the Wilderness Study Areas (WSA). (Response to letter 14.)

**Response 18.** Management guideline 2 for MAs 5 and 6 states that oil and gas leases will be issued with standard stipulations and special stipulations as needed. If a seasonal stipulation is attached to a lease and then is found no longer applicable, a variance can be requested. (Response to letter 14.)

**Response 19.** Oil and gas exploration and mining activities can be conducted in a manner which minimizes environmental damage. Impacts were analyzed in Chapter 4 of the draft RMP/EIS and in the referenced Butte District Oil and Gas Environmental Assessment. While the current market situation for oil, gas, and minerals may persist for several more years, national policy is to encourage exploration and development of domestic energy and mineral resources. (Response to letter 29.)

**Response 20.** As per letter dated August 27, 1984 from the BLM to the Montana Department of Health and Environmental Sciences, it is the policy of the Butte District, and therefore of the Garnet Resource Area, to require mining claimants filing a notice or plan of operations to provide to BLM documentation that Montana State Water Quality Permits have been secured. (Response to letter 13.)

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## Land Ownership

**Response 21.** The public lands outside the identified retention zones (see Land Adjustment map which accompanies the draft RMP/EIS) are widely scattered. Where these lands occur BLM ownership is not great enough to maintain or influence watershed values in the drainage. (Response to letter 1.)

**Response 22.** The Garnet RMP/EIS addresses only those public lands currently administered by the BLM in Missoula, Granite, and Powell counties. Those Plum Creek lands located within proposed retention areas would be logical candidates for acquisition by the BLM. However, each tract would be considered on an individual basis using the acquisition criteria displayed in the draft RMP/EIS. (Response to letter 20.)

**Response 23.** Although some of the tracts outside the retention zone may be sold, the preferred method of disposal will be exchange of isolated tracts for lands within a retention zone. Exchange allows disposal of isolated tracts while improving the land ownership pattern for both private parties and the public. (Response to letter 46.)



**Response 24.** The public lands in the Mannix Park area have been identified as a retention zone and the BLM is interested in acquiring private lands in retention zones throughout the GRA. However, the acquisition of private lands through exchange is a complex and time consuming process, requiring full commitment of all parties. For additional information, see Response 38. (Response to letter 39.)

**Response 25.** The retention zones are the better blocked areas of public land and tracts along river corridors. Lands outside retention zones are described simply as "other" lands which could be considered for either retention or disposal. Some of these lands may be retained in public ownership based on site-specific application of the BLM State Director's land ownership adjustment criteria. The preferred method for any disposal would be exchange. It is estimated that over the next 20 years only 25 percent (4,700 acres) of the lands outside retention zones will leave public ownership, 95 percent (4,470 acres) of this by exchange. No tracts will be exchanged or sold without proper environmental evaluation and documentation, including appropriate public involvement, and the required notification in the Federal Register and local newspapers.

Even prior to issuance of the State Director's Guidance and the development of the draft RMP/EIS, the GRA has had an active and successful exchange program which has resulted in public acquisition of lands which significantly expanded wildlife and recreation values in public ownership. Site-specific land ownership adjustment decisions will continue to be made after consideration of the particular trade-offs involving all resource values and uses, including wildlife habitat values.

There is no specific direction or priority in the State Director's Guidance to transfer title of public lands found suitable for disposal to the Montana Department of Fish, Wildlife, and Parks. (Response to letters 13, 26.)

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## Access

**Response K.** Access to private lands will not be restricted without coordinating first with the private landowner. This statement will be inserted in Chapter 2, page 20 of the draft RMP/EIS. The text change is shown in Chapter 8. (Response to letter 20.)

**Response 26.** Presently the BLM does not have good access for development of public lands in the Yourname Creek drainage. Access across private land in the bottom appears to be a good, logical route for a road system; however there appear to be other possible routes that could avoid private lands. Possible routes will be proposed, analyzed, and presented to the public before deciding on an acceptable road system for access to the drainage. (Response to letter 16.)

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## Recreation

**Response 27.** The hunter use estimates on pages 265 and 269 of the draft RMP/EIS are a result of BLM observations and are thought to be accurate. If the figures are off by 50 percent, the use is still low and would not affect proposed land use allocations. In addition, the allocations emphasize management practices which would not adversely impact recreation use. This has been analyzed in Chapter 4 of the draft RMP/EIS. (Response to letters 26, 39.)

**Response 28.** It is the full intent of the preferred alternative to continue current levels of snowmobile trail management. (Response to letter 33.)

**Response 29.** A license fee system for charging cross-country skiers, similar to the snowmobile user fee system, would need to be implemented by the Montana State Legislature. The BLM is exploring alternative ways to obtain funds to groom cross-country ski trails. (Response to letter 36.)

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## Cultural

**Response L.** The suggested change concerning the Lewis and Clark Trail will be incorporated on page 76 of the draft RMP/EIS. The text change is shown in Chapter 8. (Response to letter 8.)

**Response 30.** Interpretation of cultural resources, when not accompanied by increased monitoring or onsite surveillance, may result in increased vandalism. In the case of the Garnet RMP/EIS, such impacts will be minimized through monitoring (see Appendix U) and site-specific evaluation of alternative methods for interpretation during activity planning. (Response to letter 12.)

**Response 31.** The cultural resource management procedures are presented in Appendix G of the draft RMP/EIS. The National Historic Preservation Act is referenced on page 207 of the draft RMP/EIS. Section 106 of the National Historic Preservation Act, as amended, and its implementing regulations (36 CFR 800) and the National Register of Historic Places criteria (36 CFR 60.6) have been and will continue to be followed. (Response to letter 12.)

**Response 32.** The Garnet Resource Management Plan is a resource allocation document and cannot address budget issues. Funding was approached as an analysis assumption on page 103 of the draft RMP/EIS. (Response to letters 22, 34, 35, 40, 42.)

**Response 33.** There are many significant historic sites in western Montana and the importance of the Grant-Kohrs Ranch is understood. However, the listing of sites on pages 59 and 80 of the draft RMP/EIS were those occurring on public lands. (Response to letter 8.)

**Response 34.** Detailed planning for the Lewis and Clark Trail along the Blackfoot River, including compatibility with the Historic Trail Comprehensive Plan, will be conducted as a part of an activity plan mentioned in the draft RMP/EIS. (Response to letter 8.)

**Response 35.** Cultural surveys are required for each timber stand to be harvested and for accompanying roads. Also, there is a clause in every timber sale contract designed to mitigate impacts to cultural sites the BLM may have overlooked. Should you be aware of significant sites on public land not inventoried by BLM, you are encouraged to contact the GRA BLM office. (Response to letter 35.)

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## Wilderness

**Response M.** The map in Chapter 3, page 88 of the draft RMP/EIS, is correct. WSA maps of Gallagher Creek on pages 30, 39, 237, and 268 incorrectly portray foot trails as vehicle ways. There are no roads in the Gallagher Creek 202 WSA. This error will be noted in the errata, Appendix T. (Response to letters 26, 39.)

**Response N.** Appendix P has been updated to reflect the data published in the Forest Service plans and the current status of BLM wilderness studies. Also see Response 40. (Response to letters 26, 39.)

**Response 36.** The effects of wilderness management on the timber, mineral, and other resource programs were analyzed in Chapter 4 and Appendix O of the draft RMP/EIS. The resource values were described in Chapter 3 and Appendix O. Public response appears to be split between those favoring and those opposing wilderness. (Response to letters 11, 25, 46.)

**Response 37.** The special management area allocations of the Garnet RMP/EIS are provisions which remain in effect until such time as amended or until a new RMP is approved. Regulatory requirements for new RMPs or amendments provide for various opportunities for public involvement, including right of protest to the BLM Director. The rationale for selecting special management area and wildlife habitat emphasis allocations is covered in the Summary,

Chapter 2, and Appendix O of the draft RMP/EIS. (Response to letters 25, 27.)

**Response 38.** A BLM Solicitor's opinion maintains that lands acquired after passage of the Federal Land Policy and Management Act (FLPMA) in 1976 cannot be studied for wilderness. Should any of the mentioned lands be acquired they would be proposed for management emphasizing wildlife habitat, as on adjacent public lands. (Response to letter 39.)

**Response 39.** The Secretary of the Interior ruled on December 30, 1982, (published in 47 Federal Register 58372) that BLM lands of less than 5,000 acres, areas of split mineral estate, and areas being studied because they are contiguous to other agencies' existing wilderness or WSAs would not be studied under the provisions of Section 603 of FLPMA.

If a field office chose to continue study of such areas, they could do so under the provisions of Section 202 of FLPMA which provided for study of an area for a variety of protective designations under the authority of the planning regulations (43 CFR 1601.6-1). Such areas found suitable for wilderness designation will be recommended to Congress in the same fashion as WSAs studied under Section 603 of FLPMA. Such areas found unsuitable for wilderness designation would not be recommended to Congress. The final decision would be made in the Record of Decision for the RMP/EIS. A protest of such a decision should be made to the Montana State Director within 30 days of the issuance of the proposed RMP and final EIS. See the cover letter for further information. This Secretary of Interior decision is being challenged in the case of *Sierra Club et al. versus Watt, et al.*, January 13, 1983 (Civil 5-83-035 RAR). A ruling has been made on this case, but no interpretation has yet been given to the field offices. The final ruling does not affect interim management of the Garnet WSAs. (Response to letters 26, 39.)

**Response 40.** Table P-2 is a listing of areas the Forest Service was considering for study in its forest plans and was not intended to suggest that they will be recommended suitable for wilderness. At the time the draft document was being prepared the Forest Service was reevaluating all its roadless lands for wilderness suitability as required by several court decisions which found the RARE II documents for some states inadequate. This table simply states the situation at the particular moment it was written and before the forest plans were released with their findings. Table P-6, page 300, of the draft RMP/EIS is the actual listing of statutory wilderness areas in Montana. If Congress designates all the areas that currently have preliminary recommendations as suitable for wilderness, there would be 9,645,700 wilderness acres in Montana. This would be 35 percent of the federally-owned land in Montana or 10

percent of the total land base of the state. These estimates do not include the Centennial Mountains, which are still under study. See also Response N. (Response to letters 26, 39.)

**Response 41.** Table P-5 reflects administrative recommendations on wilderness currently pending before Congress.

Wilderness management has different objectives and is more restrictive in some ways than normal Park Service management. These lands are part of the whole wilderness equation and therefore will be retained in the tables. (Response to letters 26, 39.)

**Response 42.** The 200 miles of road to be constructed will be spread over 137,000 acres in the GRA during the next 20 years and will not totally occur in the WSAs. It is estimated in the plan that only 3,000 to 4,000 acres in the WSAs will be developed during the life of the plan, and the development will not occur until Congress releases them for multiple use management. Likewise, the projected timber harvest was calculated for the entire public land base and not just for the WSAs. In the preferred alternative 6,600 acres of the Wales Creek and Hoodoo Mountain WSAs are allocated to special management (MA 9) and the remaining 16,360 acres are allocated to MAs 4, 5, and 6, all of which emphasize wildlife habitat. Roads generally will be closed following completion of planned management activities. (Response to letter 26.)

**Response 43.** The 520-acre Quigg West 202 WSA contains very valuable habitat for the flourishing bighorn sheep herd and is adjacent to the 60,000-acre Forest Service Quigg RARE II area. Over half the tract is commercial forest land, not talus slopes or scree. The upper Gallagher Creek 202 WSA contains 1,000 acres proposed for special management (MA 9) and lies adjacent to a 1,700-acre tract in the Cottonwood Meadow complex which is also proposed for special management. These acreages contain important wildlife habitat. These areas are addressed in Chapters 2, 3, 4, and Appendix O of the draft RMP/EIS. (Response to letter 26.)

**Response 44.** The draft RMP/EIS discusses all significant environmental consequences which are reasonably foreseeable, including impacts occurring up to 20 years after implementation of the plan. The effects of resource development on wildlands in particular are discussed in Chapter 4 and Appendix O of the draft RMP/EIS. Also, the relationship between short-term uses and long-term productivity is summarized on page 160 of the draft RMP/EIS. (Response to letters 27, 29.)

**Response 45.** The draft RMP/EIS recommended three of the four WSAs as nonsuitable for wilderness designation after considering manageability, resource conflicts, need, and wilderness quality. Trade-offs of values and concerns, of which old-growth timber is one, also were considered in the recommendation. The ecotypes in those areas are well represented in the National Wilderness Preservation System (NWPS). (Six Douglas-fir, nine western spruce and fir, and five alpine meadow and barren ecotypes are presently represented in the NWPS. Also, 76 Douglas-fir, 109 western spruce and fir, and 5 alpine meadows and barren ecotypes are potential additions to the NWPS.) (Response to letter 35.)

**Response 46.** Vehicle use on the roads associated with the Wales Creek WSA degrades solitude values in portions of the WSA. The existence of mineralization has been documented (USDI, GS 1984 and WGM Inc. 1983). These factors, along with others, lead to the nonwilderness recommendation. However, 4,900 acres in the Wales Creek drainage is allocated to MA 9 with wildlife habitat emphasis. The resource values are analyzed in Appendix O of the draft RMP/EIS. See also Text Changes to References in Chapter 8. (Response to letter 35.)

**Response 47.** Recreational benefits derived from road building were not a consideration in recommending Gallagher Creek 202 WSA as nonwilderness. Chapter 3 states that existing roads are used by the public, but not that new roads are needed to accommodate recreational use. Mannix Park cannot be studied for possible wilderness designation because the public lands are not contiguous due to the checkerboard ownership. The resource values are analyzed in Appendix O and summarized in Table O-7, page 256 of the draft RMP/EIS. (Response to letter 35.)

**Response 48.** FLPMA and the BLM's wilderness study policy (Federal Register, February 3, 1982) guided the preparation of the draft RMP/EIS. The draft RMP/EIS identified the values of the WSAs and the trade-offs inherent in a nonwilderness as well as a wilderness recommendation. It concluded that the wilderness values did not override other competing resource uses. Public comment, received from 1979 to 1981 regarding wilderness study area classifications, was nearly divided between those opposing wilderness study and those supporting such study. (Response to letter 35.)

**Response 49.** Wilderness supply and demand were addressed in Chapter 3, page 82 of the draft RMP/EIS. Demand is one of several factors evaluated in arriving at wilderness recommendations. (Response to letter 27.)



**Response 50.** Ecotype diversity was one of several factors used to evaluate the wilderness suitability of the WSAs. Manageability, wilderness quality, economic conflicts, and need were also considered. These criteria are listed on page 9 and analyzed in Appendix O of the draft RMP/EIS. (Response to letter 27.)

**Response 51.** The existence of considerable wilderness resources in the region was not considered in evaluating the wilderness quality of the four WSAs, but is of paramount importance in analyzing the need for additional wilderness resources in the region. The Garnet RMP/EIS is a planning document involving certain trade-offs. The existence of important wilderness resources in the region decreases the scarcity value of the four WSAs. This factor combined with manageability, resource conflict, and wilderness quality issues resulted in a weighing of the wilderness value of the three WSAs as less than other competing resource uses. (Response to letter 27.)

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## Timber Management

**Response 52.** BLM timber sale receipts in the Garnet Resource Area exceed costs and no congressionally appropriated money is used to build BLM timber sale roads. The sale purchaser builds all required roads as a cost of logging. Therefore, "deficit logging" incorrectly describes GRA timber sales. Every BLM timber sale throughout the years has been purchased. (Response to letter 11.)

**Response 53.** The BLM has conducted inventories of previously logged areas to determine the level of reforestation (stocking). There are approximately 5,000 acres that were understocked as of the last inventory. These areas are being treated under a backlog reforestation program. A reinventory of the 5,000 acres is scheduled for the summer of 1985.

The allowable cut was determined by using a forest inventory, conducted in 1972, and factoring in acreages with reforestation problems. A reasonable regeneration lag time of 15 years for natural restocking is allowed. Present procedure ensures that reforestation problem areas which are harvested are being planted under the terms of timber sale contracts to avoid prolonged reforestation periods. (Response to letters 26, 39.)

**Response 54.** The reduction in stand susceptibility to spruce budworm is an important consideration in each stand treatment proposed. However, a commitment to multiple use management often restrains the treatment of large areas or conversion to species not susceptible to the insect. The above considerations are best handled in timber management plans or sale plans developed to implement the RMP. (Response to letter 31.)

**Response 55.** There are two elements basic to the concept of management areas which make up the difference of 1.5 million board feet between Alternatives B and E. Approximately one-third of the difference is due to 7,000 acres of commercial forest land being set aside or removed from timber harvest in Alternative E. The remaining two-thirds comes from the calculated 20 percent reduction in harvest from acres in MAs 4, 5, and 6.

The land use allocations for MAs 4, 5, and 6 coupled with road closures and guidelines from the Elk Logging Study (see Appendix S of the draft RMP/EIS) provide a positive approach to managing the forests for timber production as well as wildlife habitat. (Response to letter 18.)

**Response 56.** The limitations of the past forest inventory are understood. However, it was the best and only information available for developing the forestry portion of the RMP/EIS. Therefore, the potential growth figure of 76.4 board feet per year was used as an analysis assumption (page 104 of the draft RMP/EIS). A reinventory will be done when budgeting permits. (Response to letter 18.)

**Response 57.** The latest extensive forest inventory was conducted in 1972 on the Missoula Sustained Yield Unit (the public lands in the resource area). The average inventory yield was determined to be 76.4 board feet per acre per year. The maturity ages used in calculating the allowable cut were 100 years for lodgepole pine and 120 for all other species. This information, along with management area restrictions and acres of available commercial forest land, was used to determine an annual allowable cut of 7,030 mbf for Alternative E. Old-growth timber will be provided in MAs 1, 4, 5, 7, 8, 9, and 11, as well as in stands reaching rotation age in other MAs. Post sale regeneration is presently being handled as a requirement of timber sale contracts. Old understocked units are being planted at a rate of approximately 100 to 200 acres per year. Slash removal is addressed in the management area guidelines. Road closures are an integral part of the RMP and are specifically addressed in each timber sale plan. (Response to letter 35.)

**Response 58.** Visual resources are considered in each timber sale plan. Snowfall in the Garnet Range is generally sufficient to cover stumps and most slash; however, skiing would depend upon the type of cutting units and the heights of the regeneration. These specific considerations are better addressed in a timber sale or recreation activity plan. (Response to 35.)

**Response 59.** The total amount of CFL has decreased by about 4,000 acres since 1976 as a result of State Lieu Selection. However, the amount of CFL available for harvest has risen as a result of previously set aside CFL acres in Wales Creek, Hoodoo Mountain, and Gallagher Creek WSAs being proposed for multiple use management, and through acquisition of available land in exchange for land previously set aside in the Bonner Mountain area. Under Alternative E, the available CFL base amounts to 105,020 acres as compared to 87,920 acres under Alternative A, Current Management. The calculated allowable cut for 105,020 acres, including management area restrictions, produced a nine percent increase from the present level of 6,370 mbf/year to the projected level of 7,030 mbf/year. (Response to letter 13.)

**Response 60.** The sustained yield level is the 8,560 mbf/year calculated for Alternative B. Therefore, the level of harvest for Alternative E is 18 percent below the possible sustained yield level. This is a result of removing nearly 7,000 acres in MAs 1, 8, 9, 11, and 14 from the CFL base and by reducing the harvest by 20 percent on 64,720 acres in MAs 2, 4, 5, 6, and 10. (Response to letter 13.)

**Response 61.** The 1,352 acres of commercial forest land to be harvested annually, referenced on page 41 of the draft RMP/EIS, does not lead to a 78-year rotation period. As stated on page 104 of the draft RMP/EIS, an analysis assumption was that 40 percent of the acres identified in each year for timber harvest will be reentries into stands that previously have had some type of silvicultural treatment. (Response to letter 13.)

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## Road Management

**Response O.** The consideration of leaving old roads open was implied in the criteria for road management. However, it will be added on page 9 of the draft RMP/EIS. The text change is shown in Chapter 8. (Response to letter 23.)

**Response 62.** Road closures are implemented for various reasons and each stands upon its own merits. They are continually monitored for effectiveness; and, as conditions and reasons change, the closure area or dates may be altered. The Garnet Range Road serves many publics and although it has been plowed the past three winters to accommodate mining and recreational traffic, an alternate winter trail route has been maintained for winter sports enthusiasts. (Response to letter 30.)

**Response 63.** The BLM wilderness inventory for the GRA, conducted in 1981, identified the road between Gallagher Creek and Hoodoo Mountain WSAs as a constructed and maintained road which is accessible by two-wheel drive vehicles. At present the road provides access to the upper portions of the Hoodoo Mountain and Gallagher Creek WSAs and is the only road crossing the top of the Hoodoo Mountain range. There is ample protection now for elk as the adjacent area is undeveloped and there are no immediate plans or needs to close the road. As development occurs in the surrounding area, the need for road closures, to provide elk security including closure of the subject road, will be evaluated. (Response to letter 39.)

**Response 64.** Standard operating procedures and the preferred alternative provide a major commitment to road closures and walk-in hunting areas. All existing walk-in hunting units would be continued and four additional cooperative closure areas would be pursued with adjacent landowners. New roads will generally be closed after completion of the management activities.

No specific proposals have been made for the King Mountain area. Because of limited ownership, the BLM could not unilaterally control access. To date, adjacent landowners have not indicated an interest in pursuing a cooperative road closure in the area. (Response to letter 31.)

**Response 65.** Roads are a management necessity in some areas. Through activity and project planning, existing and future road needs will be evaluated for type and time of access control as a factor in elk habitat management. The impacts of roads are analyzed in Chapter 4 of the draft RMP/EIS. The road between Hoodoo Mountain WSA and Wales Creek WSA is a county road and therefore not under BLM control. See also Response 63. (Response to letter 29.)

**Response 66.** The types of roads and harvest techniques will be addressed in specific timber sale plans. Also see Responses 52 and 65. (Response to letter 29.)

**Response 67.** The status of the roads mentioned is shown on the Motorized Recreation Restriction map located in the packet at the end of the draft RMP/EIS. The Cap Wallace Road up to the old ridge road is closed to all motorized vehicle use from September 1 through November 30 as part of a cooperative road closure program to provide hunting opportunities on private land, reduce erosion, and provide security habitat during the hunting season. The original Cap Wallace Road past Chamberlain Meadows is closed yearlong, except to snowmobiles from December 1 to April 30, to minimize erosion on the granitic soils.

The Chamberlain Creek Fire Road out to Scotty Brown bridge is closed yearlong, except for snowmobiles from December 1 to April 30, to provide security habitat for big game and to minimize erosion. This road has been made impassable by logging on the public, private, and state lands. The road across the burn is closed yearlong, except to snowmobiles from December 1 to April 30, to minimize erosion and provide security habitat for big game. The last half mile of the Wales Creek Road is closed yearlong to retard erosion. The remaining portions of that road and the Elevation Mountain Fire Road are closed to all motorized vehicles, except snowmobiles from January 1 to April 30. The Deep Creek Road and Douglas Creek Road are open. Throughout the life of the plan the road closure program will be reviewed and monitored for its effectiveness, and changes in status could occur based upon the application of the criteria. (Response to letter 23.)

**Response 68.** Approximately 38 percent of the public lands are included in cooperative road closure areas. The importance of these areas is described on pages 57 and 77 of the draft RMP/EIS. Road closures would be applied as necessary on the adjacent public lands affected by timber management under all alternatives. The responsibility to properly manage wildlife habitat is acknowledged. A thorough discussion of the impacts to wildlife habitat is included in Chapter 4 of the draft RMP/EIS and in Response 85. (Response to letter 27.)

**Response 69.** A commitment to road closures is a trademark of the GRA and is carried forth in Chapter 2, pages 21 and 25 of the draft RMP/EIS. (Response to letter 13.)

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## Grazing

**Response P.** The range improvements shown in Tables 2-13 and 4-14 for Alternative E of the draft RMP/EIS have been adjusted. Weed control on 300 acres costs \$5,100, 53 miles of fence cost \$212,000, 19 cattleguards cost \$38,000, 32 springs cost \$80,000, and 3 miles of pipeline cost \$21,000. The total cost is \$356,100.

In each case (except for weed control), the numbers of improvements were adjusted downward by eliminating improvements on custodial allotments. Also, improvement costs were reviewed and some have been reduced to accurately reflect more recent costs.

Range improvement expenditures are proposed over a 20-year period, and often much of the cost is carried by the livestock operator. The costs listed above include all costs incurred should the improvement be contracted out. The benefits derived from the projects are greater than merely the collection of grazing fees. Many of these improvements are designed to benefit other resources; such as wildlife habitat, watershed, recreation, and timber management; and not solely to

increase the amount or quality of forage available for livestock grazing. These benefits were used to develop the table on page 228 of the draft RMP/EIS which reveals that the proposed improvements will result in a favorable benefit to cost ratio. Text changes are shown in Chapter 8. (Response to letters 13, 26, 39.)

**Response Q.** The planning criteria for livestock grazing on page 9 of the draft RMP/EIS will be expanded to incorporate the consideration of costs of the improvements and the benefit to cost ratio. The text change is shown in Chapter 8. (Response to letters 26, 39.)

**Response 70.** The reference to “a 128 percent plus increase in acres available for grazing” is not correct. The acreages available for grazing vary only slightly between alternatives. However, there is an increase (128 percent) in the acres under intensive management in Allotment Management Plans (AMPs) between Alternatives A and E. The AMPs are designed to benefit wildlife habitat, forest, and livestock management. (Response to letter 11.)

**Response 71.** A rest-rotation system is a grazing method utilized on the public lands and discussed in Appendix K of the draft RMP/EIS. (Response to letter 46.)

**Response 72.** Grazing fees on public land are being addressed in the 1985 *Grazing Fee Review and Evaluation, Draft Report*, prepared by the FS and BLM. Also, see Response P. (Response to letters 26, 29, 39.)

**Response 73.** Wildlife habitat is emphasized in MA 6, but livestock grazing does not need to be removed from all big game winter ranges if sufficient forage exists for both. Eliminating livestock grazing on all big game winter range would incur tremendous costs for fences, cattleguards, etc. because of the complex landownership patterns. This concern is addressed on page 56 and in Appendix N of the draft RMP/EIS. (Response to letters 26, 39.)

**Response 74.** Allotment 7216 is programmed to be fenced to control livestock use. Fencing, along with better compliance and a change in the livestock turnout and removal dates, should improve the range condition. This will enable a long-term increase in forage available for livestock and wildlife. (Response to letter 39.)



**Response 75.** Very little of the range on public lands in the GRA is in poor condition. At present only one percent is classified as in poor condition. In the preferred alternative, such rangelands will be improved to fair or good condition. (Response to letter 26.)

**Response 76.** The public lands in the GRA are not badly overgrazed. Information indicates much of the land is in good to excellent condition and conditions will improve in all alternatives through the use of intensive grazing management systems. Alternative C proposes to limit grazing on all public land to a level established for lands in poor and fair condition. The 637 animal unit months (AUMs) represent the projected long-term increase over the short-term stocking rate for Alternative C. (Response to letter 26.)

**Response 77.** A replacement fence between public lands and Champion Timberlands in the Fivemile area will be constructed. (Response to letter 16.)

**Response 78.** Gate locations cannot easily be subjected to a distance standard in western Montana. The distance between gates is more often determined by such factors as trail crossings, topography, land ownership, etc. The GRA has and will continue to install gates in fence lines on public lands at less than one-mile intervals. (Response to letter 22.)

**Response 79.** Livestock grazing is a traditional yet infrequent use of the cultural sites (MA 11) and as such is not overly disruptive to the cultural resources. The ownership pattern in many sites prevents fencing and the cost of fencing would be very high. Livestock use on cultural sites will be monitored as described in Appendix U. (Response to letter 35.)

**Response 80.** Improving riparian habitat while increasing AUMs is achievable through better cattle distribution, improvement of range condition in non-riparian areas, and implementation of allotment management plans. Also see Response 96. (Response to letter 6.)

**Response 81.** The increase in AUMs for the preferred alternative is calculated on the basis of improved forage condition created by intensive grazing management (allotment management plans), increased compliance, and so forth. Increased AUMs created by logging and transitory range are not figured into the total AUMs for the preferred alternative. In addition, Table 2-11 on page 41 of the draft RMP/EIS shows 33,770 acres which will not be leased for livestock grazing. Most of this acreage con-

tains important elk summer and fall habitat. (Response to letter 13.)

**Response 82.** As indicated on page 24 of the draft RMP/EIS in the second paragraph under Livestock Use Adjustments, target AUM figures are not final stocking rates. When adjustments are made, they will be done on the basis of mutual agreement or by decision. The latter includes monitoring of resource conditions as a basis for the decision. A monitoring plan is included as Appendix U. Most of the areas covered by the mid-1960 ocular reconnaissance and most of the areas where grazing systems are proposed were inventoried during the period 1978 to 1982 using the Montana Grazing Guides (USDA, SCS 1977). Projected increases on existing AMPs are based on monitoring that has occurred since the grazing systems were implemented. The allotments for which the ocular reconnaissance was not updated have not been proposed for adjustments in the stocking rate. (Response to letter 13.)

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## Weed Control

**Response 83.** The preferred alternative proposed to continue action on weed control. Weed control work by the BLM is to be carried out on an average of 15 acres each year over the next 20 years, subject to completion of a worst case analysis (see Response 84). This primarily will be roadside and small spot applications of herbicides to stop the spread of noxious weeds. This level of control was determined from the amount of new road which will be constructed over the life of the plan. Additional acres of public land are being treated through cooperative ventures between BLM and other agencies and landowners. Also, BLM has been active in biological weed control efforts for a number of years. (Refer to the Livestock sections for each alternative in Chapter 2 of the draft RMP/EIS for a description of the weed control proposals.) (Response to letters 17, 22.)

**Response 84.** The proposed level of weed treatment reflects BLM's efforts to control the spread of weeds on public lands only. The weed control program cannot be implemented until a worst case analysis for an environmental impact statement is prepared by the Oregon BLM State Office. The BLM is coordinating with Missoula, Granite, and Powell County Weed Boards for treatment of infested public lands. In addition to chemical control, biological control of noxious weeds can proceed and is an important part of the weed control program. Also see Appendix J, page 217, of the draft RMP/EIS. (Response to letter 13.)

## Wildlife Habitat Management

**Response R.** A stated goal of each management area is to maintain site productivity, water quality, and stream stability. In addition the Cooperative Fish Management Plan for Public Lands in Montana will be made a part of the management guidance common to all alternatives on page 25 of the draft RMP. An objective of the cooperative plan deals with instream flow reservation. Text changes are noted in Chapter 8. (Response to letter 11.)

**Response S.** The reference to limiting the size of tree selection units will be addressed in management area guideline 13 in MA 5 and guideline 13 in MA 6. The point on cutting unit size for shelterwood and commercial thinning is best explained as a timing problem. Generally the first entry in a shelterwood or commercial thinning greatly reduces current thermal and hiding cover (not as severe for single tree or group selection), and then is followed by a period of understory regeneration. A timing conflict results when subsequent harvest entries are made before the regeneration can serve as hiding cover. Delaying entry until the regeneration can serve as hiding cover usually results in unacceptable mechanical damage to the regenerating trees; and both timber and habitat management is set back. A solution is to hold the cutting units to 40 acres or less, create a favorable situation for regeneration and survival, and accept a loss of hiding cover for as short a period as possible following subsequent entries. Text changes are shown in Chapter 8. (Response to letter 18.)

**Response 85.** The importance of wildlife habitat was recognized, along with other resource values, in developing the draft RMP/EIS, (see the Summary, page xiii; Chapter 2; management area descriptions, pages 14-16; Appendix A; Appendix O; and Appendix S). The preferred alternative places strong emphasis on wildlife habitat management. Under the preferred alternative 70 percent of the public lands will have stated wildlife habitat goals as compared to the current 51 percent. Also, over 33,000 acres in the resource area will not be leased for livestock grazing mainly because these areas are important to wildlife. (Response to letters 26, 39.)

**Response 86.** The Elk Logging Study guidelines are incorporated into the management area descriptions and are included in the draft RMP/EIS as Appendix S. In the preferred alternative, the WSAs are allocated to MAs 4, 5, and 9. These allocations will provide adequate escape cover for elk. Generally roads will be closed following management activities. (Response to letters 26, 39.)

**Response 87.** The BLM has made a substantial investment in the development of the Elk Logging Study guidelines and has applied the guidelines when managing timber and elk. The effectiveness of the guidelines in managing elk and logging roads will be monitored throughout the life of the plan. The BLM has followed the guidelines in the Chamberlain Creek area and elsewhere with excellent results. In addition, the 200 miles of road will not all be constructed in important elk habitat. Where roads are constructed in important elk habitat, an aggressive road closure program will be pursued. The resulting impacts of the actions mentioned above have been analyzed in Chapter 4 of the draft RMP/EIS. (Response to letter 39.)

**Response 88.** The importance of the public lands is acknowledged and addressed in the RMP/EIS. (Response to letter 26.)

**Response 89.** Your point of standard security cover is well taken. This criterion will be applied from viewing points within the stand and serves as a guideline to analyze other factors of slope position, topography, and vegetative screening. The Deerlodge and Lolo National Forests, in connection with the Intermountain Station, will study viewing angle in assessing hiding cover quality beginning in the summer of 1985. (Response to letter 31.)

**Response 90.** Security areas and reserve blocks for the most part serve as undisturbed units thereby reducing the impacts of adjacent treated areas. Quality, purpose, topography, and location for reserve units are just as important as distances. A reserve unit must be an economical unit for future harvest and slash treatment. Reserve units are available for scheduled harvest when their purpose has been served. (Response to letter 18.)

**Response 91.** The GRA public lands were not identified as occupied, critical, or essential habitat in the USDI Fish and Wildlife Service Recovery Plan for Grizzly Bears. (Response to letter 29.)

**Response 92.** The importance of wildlife to Montanans' lifestyles and to the enjoyment of others was recognized and evaluated in the draft RMP/EIS. Many measures were recommended to enhance wildlife habitat and to diminish the impacts of other uses. However, there are reasons in addition to wildlife that lead people to reside or visit Montana. In addition, the lands are managed for the public of the entire nation. The analysis of all resource uses is mandated by the Federal Land Policy and Management Act of 1976. The preferred alternative proposes management and conservation of the resources as

opposed to the preservation of resources. (Response to letter 27.)

**Response 93.** The commenter added the word "serious" in estimating long-term environmental consequences on wildlife summer range. The impacts described on page 112 of the draft RMP/EIS represent an analysis of trade-offs to meet livestock, timber, and recreation needs. Through conscientious planning and implementation, serious habitat degradation will be avoided. In addition, the public lands are in continuous change. For example as lands are developed, a comparable acreage is becoming rehabilitated. In a single year approximately 1,350 acres will be entered for timber management (27,040 acres over the life of the RMP). Approximately 40 percent of the 1,350 acres will be lands which have previously been treated and are being reentered. Also, much of the remaining 60 percent may be managed with timber practices emphasizing wildlife habitat. (Response to letter 27.)

**Response 94.** In addition to the strong commitments made in management area guidelines toward wildlife habitat improvement and maintenance, there are substantial improvements in winter range and riparian habitat conditions as a result of intensive grazing management under the preferred alternative, page 57 of the draft RMP/EIS. Also, aquatic habitat condition will improve significantly through proper application of Best Management Practices (Appendix B of the draft RMP/EIS) and intensive grazing management. Direct habitat improvement projects funded by the wildlife program are not specifically discussed in the draft RMP/EIS; however, previous and future projects include fencing, fence removal, gate installations, browse plantings, habitat manipulation via controlled burns, nesting site construction, etc. Also, habitat maintenance and improvement is considered in the development of other resource activity plans and habitat management plans prepared by staff wildlife biologists. (Response to letter 13.)

**Response 95.** The allocation of Wales, Hoodoo, Gallagher, Murray, and Douglas areas to MAs 4, 5, 6, and 9 and implementation of the guidelines contained therein, are designed to maintain adequate security areas. Also see Response 85. (Response to letter 13.)

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## Riparian Habitat

**Response 96.** Riparian habitat will be improved primarily through the installation of grazing systems. This method will allow for periodic rest of pastures and subsequent riparian areas within each pasture. In addition, salting and possible alternate water sources should draw livestock away from riparian

areas presently in poor condition. Fencing should be considered as a last resort because it is generally too costly. Cutting AUMs was analyzed and it was determined there were other means to improve the habitat condition. The impacts are analyzed in Chapter 4 and Appendix N of the draft RMP/EIS. (Response to letters 26, 39.)

**Response 97.** Table 2-16, continued on page 46 of the draft RMP/EIS, contains a comparison of riparian habitat acreages. Table headings, Allocation/Output and Alternative E (Preferred), show there are 3,094 acres of currently unsatisfactory riparian which will be improved to satisfactory condition through intensive grazing management as delineated in allotment management plans; 1,110 acres of currently unsatisfactory riparian will likely remain in unsatisfactory condition because those acres will not be under intensive grazing management. The unsatisfactory riparian is often on small parcels of public land within large blocks of private land. There are 637 acres of riparian habitat in allotments (AMP and non-AMP) that will remain in satisfactory condition. Thus, 4,841 acres of riparian habitat will be affected by livestock grazing in Alternative E. The amount and condition of the riparian habitat outside of livestock grazing allotments are not discussed in the draft RMP/EIS. For Alternative E, this amounts to about 1,259 acres already in satisfactory condition or generally improving toward satisfactory condition within the short term without rehabilitative work. (Response to letter 6.)

**Response 98.** The 1,110 acres of riparian habitat in unsatisfactory condition are included in about eight allotments which are not scheduled for AMP development under Alternative E. However, opportunities exist in some situations for direct improvement through site-specific projects. These opportunities will be pursued. To improve all riparian habitat to satisfactory condition would require fencing. This is uneconomical and adversely impacts other resources. Also see Appendix N in the draft RMP/EIS.

There are approximately 16 miles of fish producing streams (including eight miles within livestock allotments) where stream habitat is unsurveyed. Refer to Table 3-21, page 100 of the draft RMP/EIS. Although the application of current Best Management Practices and management area prescriptions will serve to improve most suboptimum stream reaches, there are some stream reaches that will still lack adequate pool to riffle ratios or bottom material to classify as optimum condition. (Response to letter 6.)



## Economics

**Response 99.** The economic values of recreation and wildlife use of the BLM-administered lands in the GRA are significant, but the changes in land use allocations do not create major economic changes between alternatives. The difference between jobs under each alternative amounts to less than one job per activity and less than three total jobs for big game hunting, nonmotorized recreation, and motorized recreation. The present number of jobs under Alternative A is shown on Table 7-3.

Changes from these totals, as stated above, for each of the alternatives is less than one job per activity. In addition, BLM-administered lands represent a small portion of the total federal lands in Western Montana. Some of the demand for these types of recreation would shift to other federal lands, meaning that the change of jobs from Alternative A may be less than those projected by each alternative.

The 12,000 recreation visitor days per year at Garnet Ghost Town are not included since the actions described in each alternative will not specifically alter use of the ghost town. (Response to letter 11.)

**Response 100.** The analysis on pages 122 and 123 of the draft RMP/EIS reveals the real economic benefits derived from multiple use management of the public lands. The analysis reveals that timber management contributes over \$2,000,000 annually to the economy in direct and indirect benefits. This is in addition to the \$1,400,000 derived from hunting. The analysis reveals that benefits are being derived from more than one resource. Also see Response 103. (Response to letter 26, 39.)

**Response 101.** Leasing for livestock grazing is a use of the public lands authorized by Congress. The National Environmental Policy Act requires that the effects of agency actions be analyzed in an environmental impact statement. While the agency looks on the grazing permit as having no monetary value, in practice the permit does have value to the rancher holding the lease. Since this value does exist in the perceptions of a large group of the users of the public lands, it is recognized and addressed. The analysis is in no way intended to imply ownership of the public lands by grazing permittees. (Response to letters 26, 39.)

**Response 102.** The data presented in the ranch budgets are averages based upon budgets developed by the U.S. Department of Agriculture. In a depressed economy, many ranchers do not make money and use the equity in land and equipment to stay in business. In good years they will replenish their investment in land and equipment. This cycle can go on for many years if good years for selling products occur often enough. The less frequently good years occur, the more ranchers will have to quit ranching. Those ranchers with a below average debt load are in a much better position to maintain their ranching operation in times of a depressed economy. (Response to letter 39.)

**Response 103.** It is difficult to make direct comparisons between the wildlife and range programs. Under range, the numbers cited include only the grazing fees collected by the BLM and the costs incurred by BLM, while the \$573,241 figure for wildlife are benefits to the economy as a whole. The value to the economy of the ranches using BLM grazing in the GRA needs to be included to make the programs comparable. Using the portion of production of livestock from BLM lands, the direct and indirect benefits to the economy amount to approximately \$566,000. Also see Response 100. (Response to letter 26.)

**Response 104.** The Timber Production Capability Classification (TPCC) system functioned as an objective physical and biological inventory process which yielded the following:

Identification and basis for allocation of a commercial forest land base (lands capable of 16.7 percent of normal stocking and an annual growth rate of at least 20 cubic feet per acre per year and located on slopes of 65 percent or less) and,

Identification of environmental site limitations (insolation, competition, soils, etc.) which would require special management and/or reduce the annual allowable harvest.

Beyond delineating tracts of land capable of producing commercial forest products on a sustained basis, the TPCC system provides an insight into the economic feasibility of managing individual sites for timber production by identifying costly special management practices (site preparation and planting) which may be required.

TABLE 7-3  
NUMBER OF JOBS UNDER ALTERNATIVE A OF THE GARNET RMP

ACTIVITY	DIRECT JOBS	TOTAL JOBS
Big Game Hunting	39	62
Motorized Recreational Vehicle Days	3	4
Nonmotorized Recreational Vehicle Days	5	8

Most timber sales will include TPCC commercial forest classification sites in the nonproblem, fragile, and problem reforestation categories. Therefore, formulating economically sound timber sales resides more in designing defensible timber sale packages than in determining whether individual problem reforestation or fragile sites can be economically managed separately from the adjacent nonproblem sites. Also see Response 52. (Response to letter 13.)

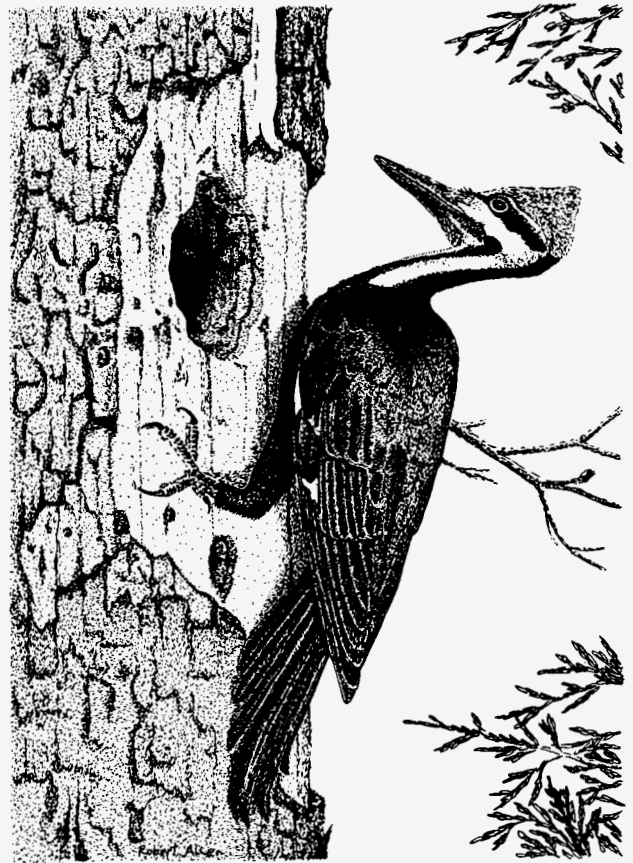
**Response 105.** The only two federal payments to Montana counties which would vary by alternatives would be those received under the Taylor Grazing Act and the Mineral Leasing Act. The figures shown in Table 7-4 are the totals by alternative and are not broken down by counties. (Response to letter 13.)

**Miscellaneous**

**Response 106.** Although the limitations of cooperative management are recognized, cooperative management has been successful and useful to all participants in the carefully selected areas where it has been implemented. (Response to letter 20.)

**Response 107.** Fire certainly is a valuable vegetative management tool. The RMP identifies areas where fire was not to be used. These are riparian, recreation sites, cultural sites, and mineral production areas (MAs 1, 2, 10, 11, and 14). The extent of these areas is shown in Table S-3 for each alternative. On the remaining public lands the use of fire will be addressed on a case by case basis. (Response to letter 31.)

**Response 108.** Similar to the question regarding the use of fire, areas were identified where the use of herbicides would not be considered. However, until a worst case analysis has been completed by the BLM Oregon State Office, the BLM is under legal restraint from using herbicides as a tool for site preparation and weed control. (Response to letter 31.)



**TABLE 7-4  
FEDERAL PAYMENTS TO COUNTIES BY ALTERNATIVE**

FUNDING AUTHORIZATION	ALTERNATIVE				
	A	B	C	D	E
*Taylor Grazing Act	\$5,546	\$8,566	\$3,343	\$3,343	\$5,807
Mineral Leasing Act	330,608	330,608	286,003	307,531	329,771
Payment in Lieu of Taxes	<u>344,114</u>	<u>344,114</u>	<u>344,114</u>	<u>344,114</u>	<u>344,144</u>
Total	\$680,268	\$683,288	\$633,460	\$654,988	\$679,692

\*Receipts calculated on the 1982 base rate of \$1.86 per AUM.