

## Chapter 3 — Implementation

### *Introduction*

Plan implementation is a continuous process occurring over the life of the Approved Resource Management Plan (Approved Plan) that will consider changing circumstances and new information through monitoring. The goal is to maintain a dynamic Approved Plan that is evaluated and amended if necessary on an issue-by-issue basis.

The implementation and monitoring process for the Monument involves four major steps: planning, implementation, monitoring, evaluation, and adjustments, as necessary. Planning involves a great amount of time and resources to identify issues and management opportunities to address those issues. During the planning process, the scope of the issue is identified and management goals, objectives and actions are defined to address the issues. Once the planning process is completed, decisions are implemented, monitored, and evaluated over a period of time to determine if goals are being met and if management actions are achieving the desired objective or standard. Results of monitoring are documented and communicated to appropriate parties, and management objectives and actions are modified based on results, if necessary.

### *Planning*

The Proposed RMP/Final EIS was approved when the Record of Decision was signed in December 2008. The Approved Plan includes all the approved decisions from the RMP.

The BLM regulation in 43 CFR 1610.5-4 provides that land use plan decisions and supporting components can be maintained to reflect minor changes in data. Maintenance is limited to further refining, documenting, or clarifying a previously approved decision incorporated in the plan. Maintenance must not expand the scope of resource uses or restrictions or change the terms, conditions, and decisions of the Approved Plan.

Land use plan decisions are changed through either a plan amendment or a plan revision. The process for conducting plan amendments is basically the same as the land use planning process used in developing RMPs. The primary difference is that circumstances may allow for completing a plan amendment through the environmental assessment (EA) process, rather than through an EIS. Plan amendments (43 CFR 1610.5-5) change one or more of the terms, conditions, or decisions of an approved land use plan. Plan amendments are most often prompted by the need to consider a proposal or action that does not conform to the plan; implement new or revised policy that changes land use plan decisions; respond to new, intensified, or changed uses on BLM land; and consider significant new information from resource assessments, monitoring, or scientific studies that change land use plan decisions.

### *Implementation*

Decisions made through the RMP planning process are implemented over a period of time. Some of the decisions were immediate and went into effect with the Record of Decision. These include decisions such as the road designations and lands available for disposal through exchange. Some decisions would be implemented after a site-specific environmental review is completed. Examples include range improvements, recreation sites, or approval of an application for permit to drill a natural gas well. Other decisions include guidance that would be applied during site-specific analysis or activity planning.

Any future proposals or management actions will be reviewed against the Approved Plan to determine if the proposal would be in conformance with the RMP. While the Final EIS for the Monument RMP provides the compliance with NEPA for the broad-scale decisions to be made in the Record of Decision, it does not replace the requirement to comply with NEPA for implementation actions.

Proposed actions fall into one of five categories: (1) actions that are exempt from NEPA; (2) actions that are categorically excluded; (3) actions that are covered by an existing NEPA environmental document; (4) actions that require preparation of an environmental assessment (EA) to determine if an environmental impact statement (EIS) is needed; or (5) actions that require preparation of an EIS. The NEPA procedural, documentation, and public involvement requirements are different for each category.

Activity level planning will address any proposed new activities and long-term permitted activities that need to be brought into compliance with plan decisions, subject to valid existing rights. Monitoring of these activities will then determine the effectiveness of applying the land use plan direction. Where land use plan actions or best management practices are not effective, modifications could occur without amendment or revision of the plan as long as assumptions and impacts disclosed in the analysis remain valid and broad-scale goals and objectives are not changed. This approach uses on-the-ground monitoring, review of scientific information, and consideration of practical experience and common sense to adjust management and modify implementation of the plan to reach the desired outcome.

As part of this process, the BLM will review management actions and the plan periodically to determine whether the objectives set forth in this document are being met. Where they are not being met, the BLM will consider adjustments of appropriate scope. Where the BLM considers taking or approving actions which will alter or not conform to overall direction of the plan, the BLM will prepare a plan amendment and environmental analysis of appropriate scope.

In addition, during the life of the Approved Plan, the BLM expects that new information gathered from field inventories and assessments, research, other agency studies, and other sources will update baseline data or support new management techniques, best management practices, and scientific principles. To the extent that such new information or actions address issues covered in the plan, the BLM will integrate the data through plan maintenance.

## ***Monitoring***

Monitoring is the repeated measurement of activities and conditions over time. Monitoring data gathered over time is examined and used to draw conclusions on whether management actions are meeting stated objectives, and if not, why. Conclusions are then used to make recommendations on whether to continue current management or what changes need to be made in management practices to meet objectives.

Monitoring determines whether planned activities have been implemented in the manner prescribed by the plan. This monitoring documents BLM's progress toward full implementation of the land use plan decision. No specific thresholds or indicators are required for this type of monitoring.

Monitoring also is used to determine if the implementation of activities has achieved the desired goals and objectives. This requires knowledge of the objectives established in the RMP as well as indicators that can be measured. Indicators are established by technical specialists in order to address specific questions and thus avoid collection of unnecessary data. Success is measured against the benchmark of achieving desired future conditions established by the plan.

Monitoring is also used to ascertain whether a cause-and-effect relationship exists among management activities or resources being managed. It confirms whether the predicted results occurred and if assumptions and models used to develop the plan are correct. This type of monitoring is often done by contract with another agency, academic institution, or other entity, and is usually expensive and time consuming since results are not known for many years.

Regulations at 43 CFR 1610.4-9 require that the proposed plan establish intervals and standards, as appropriate, for monitoring and evaluation of the plan, based on the sensitivity of the resource decisions involved. Progress in meeting the plan objectives and adherence to the management framework established by the plan is reviewed periodically. CEQ regulations implementing NEPA state that agencies may provide for monitoring to assure that their decisions are carried out and should do

so in important cases (40 CFR 1505.2(c)). To meet these requirements, the BLM will prepare periodic reports on the implementation of the RMP.

## *Evaluation*

Evaluation is a process in which the plan and monitoring data are reviewed to see if management goals and objectives are being met and if management direction is sound.

Land use plan evaluations will be used by the BLM to determine if the decisions in the Approved Plan, supported by the accompanying NEPA analysis, are still valid. Evaluation of the Approved Plan will generally be conducted every five years, unless unexpected actions, new information, or significant changes in other plans, legislation, or litigation trigger an evaluation. Land use plan evaluations determine if decisions are being implemented, whether mitigation measures are satisfactory, whether the related plans of other entities have significant changes, whether new data is of significance to the plan, and if decisions should be changed through amendment or revision.

The following evaluation schedule will be followed for the Approved Plan:

- October 2013
- October 2018
- October 2023
- October 2028

Evaluations will follow the protocols established by the BLM Land Use Planning Handbook H-1601-1 in effect at the time the evaluation is initiated.

## *Implementation Strategy*

An implementation strategy will be developed for the Monument. A well-documented, well-organized process is essential to the successful implementation of land use plans. An implementation strategy lists prioritized decisions that (1) will help achieve the desired outcomes and (2) can be implemented given existing or anticipated resources. Developing implementation strategies enables the BLM to prioritize the preparation of implementation decisions. As appropriate, this strategy will also further identify monitoring to determine if the implementation of activities has achieved the desired goals and objectives (Table 3.1).



Bullwhacker Area

**Table 3.1  
Monitoring Strategy**

<i>Resource/Goal</i>	<i>Monitoring Strategy</i>
<p><b>Air Quality</b></p> <p>Maintain the Monument as a Class II airshed.</p>	<p>No air quality monitoring sites currently exist. A detailed monitoring plan will be developed when an environmental analysis is prepared for a proposed action that could degrade air quality.</p>
<p><b>Cultural Resources</b></p> <p>Preserve historic and cultural values and sites by enhancing public awareness or protection of the resources.</p>	<p>Historic and prehistoric sites will be monitored regardless of their use category (Appendix D). Monitoring efforts will focus on updating site condition assessments, updating geographic data, tracking changes in condition, and confirming earlier National Register eligibility determinations. Mitigation, maintenance, preservation, and stabilization needs, as well as interpretive opportunities are identified at this time.</p>
<p><b>Fish and Wildlife</b></p> <p>Manage, enhance and protect the fish and wildlife habitat and habitat for special status species.</p>	<p>Monitoring of Standards for Rangeland Health (Appendix B), other resource conditions and compliance is a continuous process to ensure management goals and objectives are being met. Monitoring results are documented in periodic evaluation reports.</p> <p>Standard #5: Habitats are provided to maintain healthy, productive and diverse populations of native plant and animal species, including special status species (federally threatened, endangered, candidate or Montana species of special concern as defined in BLM Manual 6840, Special Status Species Management).</p> <p>As indicated by:</p> <ul style="list-style-type: none"> <li>• plants and animals are diverse, vigorous and reproducing satisfactorily; noxious weeds are absent or insignificant in the overall plant community</li> <li>• spatial distribution of species is suitable to ensure reproductive capability and recovery</li> <li>• a variety of age classes are present</li> <li>• connectivity of habitat or presence of corridors prevents habitat fragmentation</li> <li>• species richness (including plants, animals, insects and microbes) are represented</li> </ul> <p>The BLM will work with MFWP, landowners and grazing permittees to determine the most appropriate management practices if monitoring indicates a deterioration of rangeland health in big game herd expansion areas.</p>
<p><b>Soils</b></p> <p>Maintain or improve soil health and productivity to provide an ecosystem supporting plant and animal species.</p>	<p>Monitoring of Standards for Rangeland Health (Appendix B), other resource conditions and compliance is a continuous process to ensure management goals and objectives are being met. Monitoring results are documented in periodic evaluation reports.</p>

	<p>Standard #1: Uplands are in proper functioning condition.</p> <p>As indicated by:</p> <p>Physical Environment</p> <ul style="list-style-type: none"> <li>• erosional flow patterns</li> <li>• surface litter</li> <li>• soil movement by water and wind</li> <li>• soil crusting and surface sealing</li> <li>• compaction layer</li> <li>• rills</li> <li>• gullies</li> <li>• cover amount</li> <li>• cover distribution</li> </ul> <p>Biotic Environment</p> <ul style="list-style-type: none"> <li>• community richness</li> <li>• community structure</li> <li>• exotic plants</li> <li>• plant status</li> <li>• seed production</li> <li>• recruitment</li> <li>• nutrient cycle</li> </ul> <p>Standard #2: Riparian and wetland areas are in proper functioning condition.</p> <p>As indicated by:</p> <p>Hydrologic</p> <ul style="list-style-type: none"> <li>• floodplain inundated in relatively frequent events (1-3 years)</li> <li>• amount of altered streambanks</li> <li>• sinuosity, width/depth ratio, and gradient are in balance with the landscape setting (i.e., landform, geology, and bioclimatic region)</li> <li>• upland watershed not contributing to riparian degradation</li> </ul> <p>Erosion/Deposition</p> <ul style="list-style-type: none"> <li>• floodplain and channel characteristics; i.e., rocks, coarse and/or woody debris adequate to dissipate energy</li> <li>• point bars are being created and older point bars are being vegetated</li> <li>• lateral stream movement is associated with natural sinuosity</li> <li>• system is vertically stable</li> <li>• stream is in balance with water and sediment being supplied by the watershed (i.e., no excessive erosion or deposition)</li> </ul> <p>Vegetation</p> <ul style="list-style-type: none"> <li>• reproduction and diverse age class of vegetation</li> <li>• diverse composition of vegetation</li> <li>• species present indicate maintenance of riparian soil moisture characteristics</li> </ul>
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	<ul style="list-style-type: none"> <li>• streambank vegetation is comprised of those plants or plant communities that have deep binding root masses capable of withstanding high streamflow events</li> <li>• utilization of trees and shrubs</li> <li>• riparian plants exhibit high vigor</li> <li>• adequate vegetative cover present to protect banks and dissipate energy during high flows</li> <li>• where appropriate, plant communities in the riparian area are an adequate source of woody debris</li> </ul>
<p><b>Vegetation – Native Plants</b></p> <p>Manage for healthy vegetation communities that provide for a wide variety of long-term benefits such as aesthetics, wildlife, recreation, livestock grazing, etc.</p>	<p>Monitoring of Standards for Rangeland Health (Appendix B), other resource conditions and compliance is a continuous process to ensure management goals and objectives are being met. Monitoring results are documented in periodic evaluation reports.</p> <p>Standard #1: Uplands are in proper functioning condition.</p> <p>As indicated by:</p> <p>Physical Environment</p> <ul style="list-style-type: none"> <li>• erosional flow patterns</li> <li>• surface litter</li> <li>• soil movement by water and wind</li> <li>• soil crusting and surface sealing</li> <li>• compaction layer</li> <li>• rills</li> <li>• gullies</li> <li>• cover amount</li> <li>• cover distribution</li> </ul> <p>Biotic Environment</p> <ul style="list-style-type: none"> <li>• community richness</li> <li>• community structure</li> <li>• exotic plants</li> <li>• plant status</li> <li>• seed production</li> <li>• recruitment</li> <li>• nutrient cycle</li> </ul> <p>Standard #5: Habitats are provided to maintain healthy, productive and diverse populations of native plant and animal species, including special status species (federally threatened, endangered, candidate or Montana species of special concern as defined in BLM Manual 6840, Special Status Species Management).</p> <p>As indicated by:</p> <ul style="list-style-type: none"> <li>• plants and animals are diverse, vigorous and reproducing satisfactorily; noxious weeds are absent or insignificant in the overall plant community</li> <li>• spatial distribution of species is suitable to ensure reproductive capability and recovery</li> <li>• a variety of age classes are present</li> </ul>

	<ul style="list-style-type: none"> <li>• connectivity of habitat or presence of corridors prevents habitat fragmentation</li> <li>• species richness (including plants, animals, insects and microbes) are represented</li> </ul>
<p><b>Vegetation – Riparian</b></p> <p>Achieve, or make significant progress toward, proper functioning condition in riparian and wetland areas and sustain a diverse age-class and composition of riparian-wetland vegetation for areas.</p>	<p>Monitoring of Standards for Rangeland Health (Appendix B), other resource conditions and compliance is a continuous process to ensure management goals and objectives are being met. Monitoring results are documented in periodic evaluation reports.</p> <p>Standard #2: Riparian and wetland areas are in proper maintenance and recovery of riparian-wetland functioning condition.</p> <p>As indicated by:</p> <p>Hydrologic</p> <ul style="list-style-type: none"> <li>• floodplain inundated in relatively frequent events (1-3 years)</li> <li>• amount of altered streambanks</li> <li>• sinuosity, width/depth ratio, and gradient are in balance with the landscape setting (i.e., landform, geology, and bioclimatic region)</li> <li>• upland watershed not contributing to riparian degradation</li> </ul> <p>Erosion/Deposition</p> <ul style="list-style-type: none"> <li>• floodplain and channel characteristics; i.e., rocks, coarse and/or woody debris adequate to dissipate energy</li> <li>• point bars are being created and older point bars are being vegetated</li> <li>• lateral stream movement is associated with natural sinuosity</li> <li>• system is vertically stable</li> <li>• stream is in balance with water and sediment being supplied by the watershed (i.e., no excessive erosion or deposition)</li> </ul> <p>Vegetation</p> <ul style="list-style-type: none"> <li>• reproduction and diverse age class of vegetation</li> <li>• diverse composition of vegetation</li> <li>• species present indicate maintenance of riparian soil moisture characteristics</li> <li>• streambank vegetation is comprised of those plants or plant communities that have deep binding root masses capable of withstanding high streamflow events</li> <li>• utilization of trees and shrubs</li> <li>• riparian plants exhibit high vigor</li> <li>• adequate vegetative cover present to protect banks and dissipate energy during high flows</li> <li>• where appropriate, plant communities in the riparian area are an adequate source of woody debris</li> </ul> <p>Riparian-wetland objectives will continue to be developed and implemented through the watershed planning process or as a result of monitoring data.</p>

<p><b>Vegetation – Noxious and Invasive Plants</b></p> <p>Control, contain and, if possible, eradicate invasive plants.</p>	<p>The Integrated Weed Management plan will be updated on a periodic basis as a result of monitoring data or when new national or state plans are developed. Disturbed areas will be monitored for noxious plant infestation and control measures will be implemented as needed.</p> <p>Implementation monitoring is usually done through the annual work plan accomplishment reporting.</p> <p>Effectiveness monitoring is usually done at the local project implementation level.</p> <p>For non-herbicide treatments, implementation monitoring is accomplished through site revisits performed during the growing season of the target species to determine if treatments were implemented correctly and the best time for follow-up treatments.</p> <p>For herbicide use, implementation monitoring is accomplished through the use of Pesticide Use Proposals (PUPs) and Pesticide Application Records (PARs). Both documents are required by the BLM in order to track pesticide use annually. The PUP requires reporting of the pesticide proposed for use and the maximum application rate. It also requires reporting of the number and timing of applications. Targeted species and non-targeted species at the treatment site are described, as well as the other site characteristics. A description of sensitive resources and mitigation measures to protect these resources is also required. Most importantly, the integrated weed management approach to be taken is required.</p> <p>Monitoring of invasive plant treatment effectiveness can range from site visits to compare the targeted population size against pre-treatment inventory data, to comparing pre-treatment and post-treatment photo points, to more elaborate transect work, depending on the species and site-specific variables.</p>
<p><b>Visual Resources</b></p> <p>Protect the cultural landscape (viewshed) and the visual features in the landscape.</p>	<p>The visual resource contrast rating system will be used during project level planning to determine whether or not proposed activities will meet VRM objectives.</p>
<p><b>Water Quality</b></p> <p>Maintain and/or improve the existing hydrologic systems in the Monument.</p>	<p>Through an existing memorandum of understanding with the Montana Department of Environmental Quality (DEQ), the BLM will participate in the development, implementation, and monitoring of water quality restoration plans and TMDLs in watershed planning areas in which the BLM is a significant land manager or water user.</p>
<p><b>Livestock Grazing</b></p> <p>Permit livestock grazing consistent with maintaining healthy vegetation communities.</p>	<p>Continued monitoring as it relates to Standards for Rangeland Health will be the basis of making adjustments to livestock grazing. Monitoring intensity will be based on meeting Standards for Rangeland Health. Livestock grazing will continue to be managed through development and monitoring of grazing activity plans and supervision of grazing use. Livestock forage allocation and rangeland health will be monitored on a continuing basis for actual use, utilization and trends, and to ensure compliance with the terms and conditions of grazing permits and leases.</p>



<p><b>Minerals – Oil and Gas</b></p> <p>Provide reasonable oil and gas exploration and development on existing leased land without diminishing the objects of the Monument.</p>	<p>At periodic intervals BLM personnel, usually petroleum engineering technicians, will conduct inspections of drilling rigs and operations to ensure compliance with approved plans and regulations. During the production phase, the BLM monitors field activities. The BLM also monitors the effectiveness of BMPs and reclamation success.</p> <p>The BLM plans to monitor all oil and gas activity within the Monument in compliance with the guidance established by the Washington Office. Because of the sensitivity of the area, all activities (drilling, abandonment, and production inspections) shall be rated High priority. Guidance is contained in Instruction Memorandum No. 2008-196, which states:</p> <p>“All producing Indian and Federal cases rated High according to the Federal Oil and Federal Oil and Gas Royalty Management Act (FOGRMA) criteria must be inspected annually.”</p> <p>Ensuring that drilling and plugging operations are in compliance will minimize potential problems in the long term, particularly with regard to contamination of subsurface resources, including fresh water aquifers and surface-related environmental concerns. The IM continues with instructions to:</p> <p>“Conduct environmental inspections annually on all cases rated High due to environmental concerns. A well that has completed drilling operations and is in a producing well status is considered a High Priority Environmental Interim Inspection for reclamation concerns. High priority environmental inspections are determined if the case meets at least one of the following:</p> <p>The operations on a case are located in or adjacent to an area of special environmental sensitivity such as:</p> <ol style="list-style-type: none"> <li>a. designated wilderness areas,</li> <li>b. National Park Service and National Landscape Conservation System units,</li> <li>c. wilderness study areas,</li> <li>d. areas of critical environmental concern,</li> <li>e. sensitive watersheds,</li> <li>f. VRM Class I and II viewsheds,</li> <li>g. riparian areas,</li> <li>h. floodplains,</li> <li>i. wetlands,</li> <li>j. threatened and endangered species habitat,</li> <li>k. historic landmarks, etc.”</li> </ol> <p>The Monument is contained in criteria b.</p> <p>The BLM will document the protection of the surface after drilling operations as required by the Office of the Inspector General. After drilling operations have been completed, a majority of the pad location is normally reclaimed (reseeded, recontoured, and so on). It is important to document BLM inspection of the reclaimed area to ensure the environment is protected and the area is being properly revegetated.</p>
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	<p>The BLM ensures compliance by enforcing the following laws and regulations: 43 CFR 3100s, Onshore Orders #1, #2, #3, #5 and #7, the Gold Book, American Petroleum Institute (API) Recommended Practices, American Gas Association (AGA) and officially designated ANSI/API 2530 and AGA Committee Report No. 3, Second Edition 1985. In addition, each Application for Permit to Drill has Conditions of Approval, the mitigation in this document and the Surface Use Plan of Operations (SUPO) which all contain measures the Operators must perform.</p>
<p><b>Fire Management</b></p> <p>Manage wildland fire safely, efficiently and with minimal impact to resource values while minimizing the risk of catastrophic fire within the Monument and communities adjacent to the Monument. This includes maintaining or reestablishing the natural influence of fire on vegetation communities and associations.</p>	<p>Land uses will be monitored and adjusted as necessary after a fire to sustain soils and vegetation.</p>
<p><b>Recreation</b></p> <p>Manage for a variety of sustainable visitor opportunities in mostly primitive and natural landscapes.</p>	<p>Visitor use standards and indicators (Appendix G) establish a broad framework for managing visitor use and impacts to resources and social conditions. As monitoring confirms change in visitor use patterns and impacts, or as populations shift or other major social events occur that may dramatically change use patterns, additional refinement within those standards and indicators may become necessary.</p> <p>Recreation permits are monitored for compliance with stipulations, terms, and conditions. The amount of such monitoring is commensurate with the resource values at risk, the permittee's past record of compliance, and the ability to obtain monitoring services through other means, and other factors (BLM Handbook H-2930-1).</p>
<p><b>Transportation</b></p> <p>Provide access to state and federal land and reasonable access for private landowners while protecting the features of the Monument.</p> <p>Manage legal and physical public access to and within the Monument to provide opportunities for diverse recreation activities (motorized and non-motorized) while considering the surrounding regional recreation opportunities in northcentral Montana.</p>	<p>New signs will be added where monitoring indicates a need to enhance safety or prevent resource damage or visitor confusion. The BLM will monitor the effectiveness of Minimum Maintenance Standards.</p>
<p><b>Wilderness Study Areas</b></p> <p>Preserve or enhance the primitive characteristics of the wilderness study areas.</p>	<p>All wilderness study areas are monitored on a minimum standard of surveillance that will insure compliance with the Interim Management Policy and Guidelines for Lands Under Wilderness Review (IMP). A basic monitoring level of at least once per month during the months the area is accessible by the public should be adhered to, or more frequently if necessary because of potential use activities or resource conflicts.</p>