



United States Department of the Interior



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In Reply Refer To:
6500 (920.JC)

December 11, 2013

Catherine Wightman
Montana Fish, Wildlife & Parks
PO Box 200701
Helena, Montana 59620-0701

Dear Ms. Wightman:

The Montana/Dakotas Bureau of Land Management (BLM) applauds the efforts of the State of Montana to develop a sage-grouse habitat conservation strategy to complement the BLM planning efforts and provide a framework for conservation of the species across Montana. We recognize the extraordinary level of effort it took on the part of you and your partners to produce a comprehensive strategy in such a compressed timeframe.

In offering our comments on the Draft Montana Greater Sage-Grouse Habitat Conservation Strategy (DHCS) we focused on those issues where the Bureau of Land Management feels the current draft could be altered to provide for a more consistent and coordinated approach that will benefit both the State and BLM. Our comments derive from the range of alternatives in our draft land use plans and amendments and the comments and input we have received from our cooperators and a broad spectrum of interested stakeholders. The first section describes our overall impressions and general comments followed by a table of comments addressing specific components and content of the draft plan.

Overall Concerns and Comments

In general, we feel the document would benefit from the increased clarity and structural changes outlined herein. A number of the detailed comments provided below note inconsistency or internal conflicts within the document as well as a number of ambiguities which, if addressed, will yield a more defensible plan. In a number of places, the document seems to imply that these recommendations will apply to Federal permitting processes. We would like to see those sections clarified to note that they apply to activities and actions requiring State permits only, with the caveat that many of the activities that occur on public lands are also permitted under the auspices of the State.

We encourage the council to include a section early on in the document that better describes the goal of the actions described in the document and which entities will be required to use this document. We suggest that the goal statement in the current Montana Plan and Conservation Strategies for Sage Grouse in Montana – Final (2005) (PCSM) is still valid and should be used. This goal statement reads “*Provide for the long-term conservation and enhancement of the sagebrush steppe/mixed grass prairie complex within Montana in a manner that supports sage grouse, a healthy diversity and abundance of wildlife species, and human uses.*” We would also like to see a direct statement in the section noting that the stipulations in the plan apply to those activities permitted by the State of Montana as noted above.

We suggest that a section should be included in the DHCS to clarify the relationship between the DHCS and the PCSM. The BLM was a signatory on this document and the conservation actions in the document were developed with a wide variety of stakeholders and management agencies. Although portions of the document are now dated, the current plan is a valuable foundation for sage-grouse conservation in Montana and has provided a framework for the sage-grouse management actions in many of our resource management plans. We note that the DHSC suggests that the DHSC is an update to the PCSM (Pg. 3, line 20-21), but the DHSC does not include much of the content of the PCSM. We hope the DHCS will be incorporated into the PCSM as needed to reflect regulatory certainty, new information, research, and management obtained since its development. In fact, many of our concerns with the DHCS are dealt with in a more effective manner in the PCSM than they are in the DHSC.

Two major issues where we feel the PCSM provides a more robust and reasoned approach are; fire in sagebrush systems, and the control of noxious weeds. In our estimation the current language in the DHCS suggests that sagebrush can be managed as a static system. We feel the guidelines in the PCSM better address the dynamic nature of sagebrush and sage-grouse habitats and allow for a full range of habitat management activities to ensure the range of habitats needed by sage-grouse continue to persist.

The delineation of Special Management Core Areas, particularly those currently within areas prioritized for sage-grouse management in our land use plans and plan amendments is problematic for us. We also recognize that there are special management concerns for a few of these areas, but others appear to be added to avoid potential future issues with sage-grouse management. The plan appears to delineate SMCA's for resources that the State has no regulatory authority over, particularly bentonite and coal mining.

We recognize the potential utility of establishing disturbance caps, but the process to monitor and determine as well as the subsequent permitting process is also a concern for the BLM. We anticipate working closely with the State of Montana to further clarify how this approach to sage-grouse conservation will work within our draft plan and plan amendment range of alternatives. We would like to make sure that we can cooperatively develop a process to ensure that the lands the BLM manages are not unduly constrained by actions the State or BLM are unable to regulate.

We would also encourage the council to incorporate more rigorous use of references in the document so that the reader can conveniently assess the scientific basis for the recommendations. Additionally, we feel the document would benefit from the addition of a section that more thoroughly addresses re-establishment of sagebrush communities and actions the State could use to facilitate sagebrush restoration.

Detailed Comments

Attached are detailed comments that address a wide range of issues with the draft plan, ranging from language suggestions, to more detailed comments regarding the general issues noted above. Thank you again for the opportunity to comment on the Draft Montana Greater Sage-Grouse Habitat Conservation Strategy. We look forward to our continued coordination in the development and the implementation of our respective planning process and working towards an effective and consistent sage-grouse conservation strategy throughout Montana. If you have any questions regarding these comments or other sage-grouse related issues, please contact Conservation Biologist John Carlson in our state office at (406) 896-5024.

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General		No mention or recommendations for recreational uses on State lands.
3	7	Consider adding "industry" as we believe they are a key cooperator/player in the conservation of sage-grouse.
6	3-5	The Local Sage Grouse Working Groups were established several years ago and are still functioning groups. Very few private landowners have been participating in the meetings. Participation by landowners and land managers in this established forum should be encouraged.
7	1	Suggest you add "and enhance" after conserve. The goal should not be to simply conserve sage-grouse populations.
7	2	In line 2, it is stated, "the following stipulations" and line 12 reference is made to "general overarching provisions." Are these the same and if so, suggest they are referred to one way.
7	5-7	What are the "rangeland health standards" being used? How will private lands be monitored? Who will do the monitoring?
7	6-7	Reference is made to rangeland health standards. This is generally regarded as a BLM term. Are entities outside of BLM going to know what this means? In addition, are rangeland health standards identified?
7	12	In line 2, it is stated, "the following stipulations" and line 12 reference is made to "general overarching provisions." Are these the same and if so, suggest they are referred to one way.

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8	1	Suggest “and improve” be inserted after conserve.
8	2-3	We would agree the focus should be private lands. However, there may be instances where sagebrush habitats could be improved on land not in private holdings.
8	8	States “It is assumed” but will they? Do existing uses and rights fall into the 5% disturbance? This is contradictory throughout the document.
8	14-15	Suggest “recognizing that all” be replaced with “subject to” and delete “shall continue”.
8	16-17	Stipulation 6 is contradicted throughout the document, as there are references to various State agencies responsibilities for review.
8	18	What permits are you referring to? Elsewhere in the document, you state the provisions are only applicable to those actions requiring a State of Montana permit. Please clarify.
8	21	Again, in order to provide for “certainty”, suggest “may” be replaced with “shall”.
9	1	Core and connectivity and general habitat constitutes all sage-grouse habitat. We suggest you state the focus will be on core, with connectivity secondary, and general a lesser priority.
9	9	With silver sagebrush habitat, we may not want to suppress under the right conditions. Three-tipped and mountain may be included in other areas of the State.
9	9-11	Would the State of MT prioritize sage-grouse habitat over the private land and property, structures etc.?
10	1-2	The last sentence does not flow well with the stipulation. We suggest this be deleted.
10	3	Suggest inserting “and if warranted, recommended for implementation” after reevaluated.
11	1-3	Please consider adding “and Special Management Core Areas” after “Core Areas”.
11	4-9	A definition for Special Management Core Areas” should be included here.
12	4	Suggest this be deleted.
12	5-6	Delete “to ... listings” as this is understood.
12	16-17	You state individuals would not be eligible. What about ranch LLC or partnerships? These are not individuals, but the intent may have been to exclude such entities.
13	5	Suggest “and enhance” be inserted after conserve.
14	1	Define active lek
14	2	Since this section is specific to Core areas, we suggest you delete, “within Core Areas”
14	6	Suggest “significant” is deleted and “resulting in the loss of sage-

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		grouse populations" be inserted after damage.
14	13	Item b. - Replace Authorized with Permitted. A permit may be issued, which constitutes a valid existing right, prior to an activity being authorized.
14	14	Item c. - We suggest this be deleted, as it may be difficult to identify what constitutes "Proposed Activities".
15	2	Suggest remove "typically"
15	3-4	Suggest deleting, "in Core....present."
15	11	remove "special management core areas"
15	11-12	Measurements in eastern Montana suggest that on a calm morning, decibel levels are around 22dBAs in non-impacted areas. May want to provide a default of no greater than 32 decibels at the perimeter of the lek.
15	17	Locate roads more than two miles from lek, but if there are multiple leks in area this may not be possible or you may end up with twice as many miles of road to avoid certain areas.
15	17 - 18	If the wells are NSO 1-mile and many wells produce waste water that require transporting off-site, 2-miles for roads will not be consistent unless we are requiring reinjection or piped off-site.
16	3	Location of overhead lines one mile from lek may not be practical (depending on other landownership within one mile) and topography may allow for it to be closer.
16	3-4	Suggest all low voltage powerlines in Core Areas be buried (whenever technically feasible) or sited in those instances burying lines is not possible.
16	3-4	Why is there a discrepancy between Core Areas (minimum of one mile from active leks), general habitat (within 2 miles of important breeding, brood-rearing, and winter habitat follow current APLIC guidelines), and exempt activities (within 0.6 miles from leks no review is required if construction does not occur March 15 to July 15) for siting powerlines?
16	7	Suggest "encouraged" be replaced with "required" and "economically" be replaced with "technically".
16	9	Insert "or suspected" after identified. It will be difficult/impossible to positively identify powerlines contributing to sage-grouse population declines.
16	20-23	This section seems inadequate. Other than the one pad per square mile, this says nothing further. Noise associated with pump jacks, location of flow lines, size of the pads and much more should have been addressed.
16	21 - 22	Appears to allow "main roads" within 2 miles of lek
16-17	24-19	This section was hard to follow. We suggest you identify what types of mining you are referring to. Is the focus bentonite? What underground mining in core areas would require bore holes, etc.?

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		mining you are referring to. Is the focus bentonite? What underground mining in core areas would require bore holes, etc.?
17	8-9	If the focus of this is bentonite, limiting disturbance to one project per square mile may be unachievable. But this all depends on the definition of a project area. Is it one pit location, multiple pits in the general area, or some other defined area? Suggest this is reconsidered. May want to require compensatory mitigation.
17-18	20-10	There are no stipulations applied to coal mining. This appears to simply identify a portion of the coal permitting process. Item b on page 18 discusses "Unsuitability Criteria." Is the intent to recommend designating coal mining in core areas as unsuitable (with exception)?
18	11	Wind energy development will be avoided in sage-grouse core area. This is more consistent and less confusing with the mitigation framework on p. 30 line 12. Given the amount of private lands, true wind energy exclusion in core habitat would require state permitting approval on all lands, which we understand is something the State cannot currently regulate.
18	13	Is grazing considered a vegetation removal activity? Maybe this section should be identified as all other surface disturbing activities.
18	15	The 4 miles is inconsistent with the 5% stipulation and the 2 mile requirement for main roads. We suggest you make this a part of the 5% disturbance or manage consistent with other disturbances.
18	18	Use language from general habitat instead (p. 26 lines 9-16)
18	18	This is vague on what constitutes an enhancement vs. "treatment aimed at reducing sagebrush". Prescribed fire treatments obviously reduce sagebrush but could have the effect of enhancing old, decadent stands, creating lek space, etc.
18	18-23	This portion of the strategy seems too stringent; if future research indicates that sagebrush stands with certain canopy coverages or lacking herbaceous understory may benefit from a treatment it would not be allowed. I suggest modification of this section to leave the potential to treat sagebrush if science and monitoring indicate sage-grouse could benefit from the treated sagebrush.
18	18-23	The strategy states to "oppose prescribed fire in sagebrush habitat" (p. 33, line 18) and that "sagebrush canopy cover should be maintained at present levels" (p. 18, line 20-21). Yet, it also states to "prioritize conifer reduction in Core Areas where appropriate" (p. 33, line 22 and p. 36, line 7-8). Does this mean that the State will not permit the use of prescribed fire to reduce conifer expansion in all sagebrush habitats? Prescribed fire should not be used in all sagebrush habitat depending on the sagebrush species (i.e. Wyoming big sage, Basin big sage). However, prescribed fire is a useful tool to reduce conifer expansion on sites with mountain big sage and three-tip sagebrush. These species

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		respond well to fire, regenerating within 15 years, on average. Sites with mountain big sagebrush and three-tip are usually the sites with conifer expansion, as opposed to sites with Wyoming and Basin big sagebrush. Prescribed fire is much more successful at eradicating seedling conifers compared to only using mechanical treatments. Restricting the use of prescribed fire to reduce conifer expansion would eliminate a successful method for landowners to prevent sagebrush habitat from transitioning into conifer forest. Enforcing a ban on prescribed fire in sagebrush habitat would negatively tie the hands of landowners and land managers.
18	20 – 21	States “Sagebrush canopy cover should be maintained at present levels?” What about burning or sagebrush removal for the long-term maintenance of sagebrush/grassland habitats? Ecosystems are dynamic, therefore by the very definition will not be maintained at present levels. A range of sagebrush canopy cover within the different sagebrush habitat types should be defined to best meet seasonal habitat needs of sage grouse , (eg 15 – 25% in Mountain big sagebrush in nesting/brood rearing habitat, etc.).
18	21	Suggest replacing “at” with “or increased from”
19	10	Currently most DNRC rangelands do not have grazing management plans. Does this mean they will have to have AMP’s for future management?
19	15	What does prioritize suppression mean? All fires are prioritized given certain listed priorities. Is this saying prioritize fires in core habitat areas over general habitats? If so then should state this. It would be helpful to state what else sage brush fires are supposed to be prioritized over.
19	15-18	We are curious how this is going to be enforced by the State of MT through the DNRC to the counties. Nearly all the sage-grouse habitat is in Eastern MT. All of the wildfire suppression resources in eastern MT for the DNRC lands are county fire departments. Most of these departments are volunteers who are unpaid and leave their jobs to respond to a wildfire on State or private ground. They typically put the fires out as fast and as easily as they can...so depending on which type of tactic they deploy, this may benefit or not benefit sage-grouse habitat.
19	16	Suggest changing to the following “wildfires <i>over 10 acres</i> , lands shall be treated...” Better to define minimum acreage size—10 was used for exempt reservoirs on p. 29 line 4. Otherwise treatment and monitoring could be onerous and provide little value.
19	19	Who will be responsible for the monitoring? Will this also take place on private lands?
19	19-21	Please specify who will conduct the monitoring. Monitoring is often

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		required in plans, but never implemented because the funding or labor is not available to conduct the monitoring. A requirement of the project proponents to monitor is a good approach; however, in the case of wildfires it would fall on the State agencies to complete.
19	19-24	What if no active leks are known, but surveys have not been conducted to locate active leks. Some areas have had very few surveys done.
20	3-6	This stipulation generates numerous concerns. First, sage-grouse population response to surface disturbing/disruptive activities often takes several years to be realized. Research has shown the lag effect can be four or more years. We would expect the reverse to also be true. Second, simply shutting down operations until populations rebound may never occur. If wind towers, coal mining, major transmission lines, etc. are in place, simply shutting down operations without removal and complete restoration of the disturbed sites will have little if any impact. Finally, because the burden of proof will likely be the responsibility of the permitting agency, having the science to support or agency authority needed for shutting down operations seems highly unlikely, if not impossible. We believe actions need to be in place prior to development that will not result in impacts to sage-grouse habitats and the associated populations.
20	14	Suggest providing a specific timeframe for weed control. "The operator is required to control noxious and invasive plant species, including all non-native annual grasses for 3 years after a seeding has been deemed successful."
20	15	Include Japanese brome (<i>Bromus japonicas</i>) with cheatgrass.
20	19-20	Suggest defining what happens if existing activities exceed 5% disturbance threshold. Will activity be denied? Does activity need to be completely within existing disturbed or unsuitable habitat? Is offset mitigation acceptable?
21	All	We applaud the Council's effort to recognize all Core Areas are not the same and those with ongoing or valid existing rights may need to be treated differently than Core Areas devoid of disturbance. We ask the Council to consider; 1) removal of the Core Area designation for the PR Basin and Cedar Creek areas. Both areas are, or will be, developed to a point; providing viable sage-grouse habitat for many years is improbable. The BLM suggests management should be focused on the other Core Areas, as the ability to impact sage-grouse populations may be greater. 2) Bentonite Special Core Areas left as the plan states, is acceptable, as development and subsequent reclamation is more rapid than areas developed for coal or oil & gas. But the area

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		needs to mapped to not have core area within the red polygon. It is understandable that the unshaped areas within the red polygon will not be mined for bentonite, but the area does contain a transportation network (e.g. haul roads). Due to the existing impact of these roads, this area is better suited for the special management delineation. If the PR Basin Special Management Core Area designation is carried forward, we suggest the small portions of Core Areas directly adjacent to the Special Management Area be changed to Special Management Areas. The small areas not designated as Special Management Areas are not large enough to effectively enhance sage-grouse population and with coal mining directly adjacent to these areas, their value as Core Areas is limited.
22	14	We suggest inserting, "or expand existing" prior to "Special". We believe it is probable the boundaries of those Special Management Core Areas could be expanded.
22	table	We suggest Oil and Gas be added to the resource column in Carter County and coal bed natural gas be added to resource column in the Powder River Basin.
23	9	Insert "decline" prior to threshold.
23	11	Insert "negatively" prior to impacted.
23	22-23	Replace "maintain habitat conditions" with minimize habitat loss". We believe we should strive to maintain and enhance all sage-grouse habitat. However, if we are going to preclude development in Core Areas, we have a responsibility to provide areas for development to occur. In some instances, this will be general habitat. No net loss is unrealistic.
24		Why would buffers for leks be different in General habitat than in Core Habitat. A lek is a lek, and while I understand different levels in management constraints in General and Core habitat, there are fewer leks in General habitat so on an individual basis are just as important to sustaining sage-grouse populations. (For example – line 3 defines only a 0.25 miles NSO of active leks. That level of disturbance only ¼ mile from a lek seems likely to cause lek abandonment.)
24	3	Why are they using 0.25 mile lek buffers? If I remember right, WY is 0.5 miles.
24	3-4	There is a long history of using guidelines or stipulations within a 1/4-mile buffer around leks to protect sage-grouse from adverse impacts of human activities. We have been unable to document any scientific literature that served as the basis for the establishment of this buffer, and new data suggest that this buffer size is inadequate to prevent impacts to breeding populations (Walker et al. 2007a).

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24	11	Suggest “and” be replaced with “or” as it is probable nesting and early brood rearing areas are not one and the same.
25-26	14-4	There is no stipulation or management guideline identified. We suggest a requirement for off-set mitigation be required (it is a part of the BLM’s mitigation for federal coal) for those areas of non-federal coal.
26	4	Do MSUMRA/SMCRA have sage grouse stipulations?
26	13	Evaluated by whom, on what lands and for what purpose?
26	9-12	This section needs to be re-worded. Where are your optimum levels of sagebrush identified? What are “optimum levels as described above?”
28	1-2	Item 6 in the General Provisions states, “The strategy in no way adds or expands the review or approval authority of any State agency.” It seems the last sentence somewhat contradicts this statement, as does the general direction outlined throughout the strategy.
28	4-6	We see this as problematic unless there is an entity with the authority to review the results. Without consistency related to what parameters shall or shall not be included, discrepancies seem likely.
28	9	Please provide clarification for “the following core areas.” As written, it is confusing.
28	11	Suggest “and if warranted, recommended” be inserted following “considered.” Need to provide a mechanism for approval.
28	17	Addition to EXEMPT ACTIVITIES - should include conifer encroachment treatment (mechanical, herbicide and Rx fire) in mountain big sage brush (<i>Artemisia tridentata</i> var. <i>vaseyana</i>) and three tipped sage brush (<i>Artemisia tripartita</i>) where monitoring data shows a need for treatment to prevent conversion to forested habitat.
29	1	Again, we suggest you provide clarification as to what “meet rangeland health standards” means, what are the standards, who determines if standards are being met?
29	1	Existing grazing operations that meet whose rangeland health standards? And who is going to measure/monitor this?
29	1 – 3	Just because there is an allotment management plan in place does not ensure that Rangeland Health Standards will be met. The most common reason that rest-rotation grazing plans fail is overstocking. Therefore the statement should be re-worded as follows: “Existing grazing operations that meet Rangeland Health Standards or utilize recognized rangeland management practices designed to make progress towards meeting rangeland health standards. “ A monitoring plan should be put in place to measure progress towards meeting Rangeland Health Standards where they are not currently met.
29	4	Why is this only applied to reservoirs less than 10 acres in size? Any reservoir, not properly constructed, has the potential to produce <i>Culex tarsalis</i> , the mosquito responsible for transmitting West Nile virus.

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29	5-6	Drilling of agricultural and residential wells is very different than construction of reservoirs. We suggest references to wells be either made a separate bullet or deleted. Wells are generally not an issue. However, overhead powerlines need to power the wells or windmills can be problematic.
29	7-8	Suggesting review is not required if construction does not take place between March 15 and July 15 makes no sense. The timing restriction while providing limited value to lekking or nesting sage-grouse is much less of an issue when compared to the structures being in close proximity to leks for the long term and impacts of the associated use of the reservoirs or wells.
29	9	Suggest inserting "overhead" prior to "electrical".
29	9-10	Again, suggesting review is not required if construction does not take place between March 15 and July 15 makes no sense. The timing restriction while providing limited value to lekking or nesting sage-grouse is much less of an issue when compared to the above-ground powerlines being in close proximity to leks and within sage-grouse habitat for the long term.
29	11-13	Suggest "Effective raptor and corvid perching deterrents shall be installed on all poles within 0.6 miles from leks."
29	15-16	Define/illustrate properly marked fences that will be exempt.
29	15-16	Wire fences if built using wildlife friendly specifications as provided in "A Landowner's Guide to Wildlife Friendly Fences: How to Build Fence with Wildlife in Mind"(MTFWP) and fitted with visibility markers where high potential for collisions has been modeled
29	15-16	Suggest adding "or suspected" to the end of the sentence. Even better pole fences should be avoided in areas where potential collisions are suspected.
29	19-20	Spring development if the spring is protected with a fence built using wildlife friendly specifications as provided in "A Landowner's Guide to Wildlife Friendly Fences: How to Build Fence with Wildlife in Mind" (MTFWP) and enough water remains at the site to provide mesic (wet) vegetation.
29	22	Spraying of grasshoppers could have a negative impact on sage-grouse chick survival.
29	24	Delete "existing"
30	3	Item L – Either delete or revise to state any pedestrian surveys, inventories or monitoring.
30	7	What is the "Service's hierarchy"? This needs to be clarified in the strategy.
30	12	State "Avoid new disturbance to habitat in Core Areas." Should be "unnatural disturbance". Mountain big sage brush and three-tipped

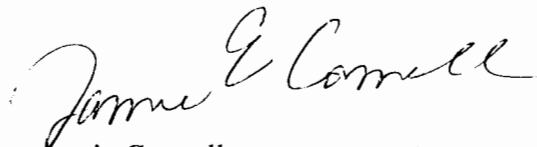
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		sagebrush habitats evolved with fire as a natural disturbance and recover relatively quickly following fire. This creates structural and seral diversity at the landscape level as well as an increase in forbs within the burned mosaic. In addition, these cooler burning Rx fires result in a vegetative break in larger expanses of sagebrush steppe habitat making wildfire suppression efforts more effective in these areas.
31	4	Suggest adding “including Special Management Core Areas” after Area.
31	21	Who in the “The State of Montana” does this refer to? Is this only if State-owned (DNRC) land is involved?
32	15	Does this mean all State lands will have grazing management plans?
32	23	Does the State even have a project database that lists all the range structures on State lands? And if so who is going to be responsible for monitoring the effects to sage grouse?
32	8-10	BLM has identified monitoring standards, which are largely tied to permit renewal/issuance and rangeland health assessments. If Standards for Rangeland Health are not being met, the BLM must take action to ensure Standards are met. One of the Standards is tied to wildlife habitat with the primary emphasis in suitable habitat, being sage-grouse.
33	8	Clarify “Wildfire temporarily or permanently eradicates sagebrush habitat.” Identify the science behind this and explain the effects to different species of sagebrush.
33	9	What does “positive feedback loop” mean in this context?
33	10-11	The statement, “the replacement of ... sagebrush ecosystem.” is simply not true for the majority of Management Zone 1. This is true for the Great Basin, but is largely inaccurate in Montana.
33	18	Oppose prescribed fire in sage-grouse core habitat unless it is demonstrated to be a benefit to sage-grouse.
33	18	Evaluate on a case-by-case basis all proposed RX burns in core or general habitats. A blanket statement or policy that opposing all RX burns may preclude some benefits from occurring as a result of this type of treatment.
33	18	Sagebrush reacts differently to fire depending on the species. This statement is painted with too broad of a brush. Prescribed burning should not be conducted in Wyoming big sagebrush, black sagebrush, low sagebrush, Basin big sagebrush or silver sagebrush habitats as these habitats did not evolve with fire and usually cross over a threshold with this type of disturbance. However, Mountain big sagebrush and three-tipped sagebrush habitats evolved with fire, fire is a natural disturbance in these habitat types and periodically fire is necessary to prevent conversion to forested habitat (conifer

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		encroachment). Could restrict with timing or % of 6 level HUC to be burned within the given timeframe to mitigate concerns.
33	18	Fire may be used in silver sagebrush habitats if it will promote the health of the sage-grouse habitat.
33	18	Probably should say "oppose broadcast prescribed fires." Pile burns of, say, encroached conifer that was removed to enhance habitat would be a good thing.
33	18	Says "Oppose prescribed fire in sagebrush habitat." This is very limiting and does not address pile burning to eliminate conifers that were thinned and piled. Also prescribed burning can help to maintain diversity in sagebrush habitats if done correctly. Statement limits any opportunity.
33	19	Suggest replacing with "Prioritize eradication of non-native annual grass species and/or address management practices."
33	22	Agree with statement, but how will it be implemented? Need to allow the most effective tool, Rx burns and/or mechanical treatments to achieve objectives.
33	19 – 20	"Prioritize eradication of cheatgrass" is vague. Suggest the following: A. Prioritize prevention and spread of cheatgrass by 1) minimizing disturbance in susceptible areas; 2) seeding during the first fall following disturbance with a competitive seed mix; 3) managing for healthy cool season bunchgrasses within sagebrush steppe ecosystems; 4) proper application of herbicides to treat other noxious weed species (too much herbicide on a site specific basis favors cheatgrass). B. Treat existing cheatgrass infestations on a priority basis (eg. Core Habitat as highest priority) using all tools as science and technology evolve.
34	6-7	What are "private operators"? Local landowners?
34	8	Suggest deleting, not needed.
34	9	Should probably say "burnouts" or "burning out" instead of "backfires." Backfires are a larger-scale tactic, meant to change the direction of the main fire. Maybe that is what is meant. Perhaps replace with "use direct attack tactics as much as possible; minimize acreage burned."
34	12	"fire risk is likely" is unclear and vague. How is this determined?
34	14	Consider adding some of the BLM best management practices including: To the extent possible, locate wildfire suppression facilities (i.e., base camps, spike camps, drop points, staging areas, heli-bases) in areas where physical disturbance to sage-grouse habitat can be minimized. These include disturbed areas, grasslands, near roads/trails

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		or in other areas where there is existing disturbance or minimal sagebrush cover. • Minimize unnecessary cross-country vehicle travel during fire operations in sage-grouse habitat. • Minimize burnout operations in key sage-grouse habitat areas by constructing direct fire line whenever safe and practical to do so. • Utilize retardant and mechanized equipment to minimize burned acreage. • As safety allows, conduct mop-up where the black adjoins unburned islands, dog legs, or other habitat features to minimize sagebrush loss. • Power-wash all firefighting vehicles, to the extent possible, including engines, water tenders, personal vehicles, and ATVs prior to deploying in or near sage-grouse habitat areas to minimize noxious weed spread.
34	18	What "tools" does this refer to?
34	18	Should just say "invasives," cheatgrass isn't the only concern.
35	8	Monitoring doesn't ensure success. It just measures whether or not objectives are achieved.
35	11	Suggest adding "shrubs" after forbs.
36	3-4	Although this may be a good idea, little would be gained through such a designation. Suggest this be deleted.
36	5	Prioritize eradication of non-native annual grass species and/or address management practices.
36	5	Prioritize eradication of cheatgrass is not a realistic goal – If you are prioritizing for eradication then biological control wouldn't be an option. The control will never totally eliminate its food source. Biological controls will reduce competitiveness of the species and allow for natives to better compete.
36	5	Don't use the chemical trade name "Plateau"; this looks like you are endorsing a certain company and type of herbicide. Instead either just put herbicide treatments or use the chemical name of imazapic.
36	7 – 8	Agree with statement. And need to allow for all tools including mechanical, herbicide and Rx burn to achieve sagebrush steppe restoration objectives.
36	20	You may want to add "the following" at the end of this line.
37	1	Although suggest noting that some old homesteads may be historic structures. This becomes a SHPO issue.
37	3	This is inconsistent with the stipulation section, where one to two miles is generally identified as buffer distances. This should either comply with the stipulation section or in that section, state "unless otherwise stated in the document"

Page No.	Line No(s).	Comment/Suggested Revision
38	General	Hunting is predation and should follow the same guidelines as defined under Predation. In areas where sage-grouse populations are reduced or declining, no hunting should be allowed.
39	12	Suggest that the membership of the MSGOT team appointed by the Governor be reexamined to ensure that there is an adequate representation of science and biology expertise.
40	All	We agree that at least in the early years, the manpower request may be inadequate to meet demands. This could result in delays in approval for development.
49	3	Requiring 5% minimum silver sage canopy coverage for greater sage-grouse habitat is not supported by the literature. Canopy coverage for the Silver Sage/Undifferentiated Wheatgrass Community Type averages 2% with a range from 0 – 7%. The patchy nature of silver sage stimulates forb production which is necessary for sage-grouse brood survival.
49	3	Habitat Assessment Framework identifies <10% as Unsuitable Habitat.
49	20-22	Surface disturbing activities including roads/road maintenance and farming should be included in the calculation.
51	26-27	Identifies existing disturbance as being calculated in the total disturbance; this is contradictory to how it was explained at the public meeting. And what it says elsewhere in the document about existing disturbances being grandfathered.

Sincerely,



Jamie Connell

BLM Montana/Dakotas State Director