



## NATIONAL WILDLIFE FEDERATION®

*Northern Rockies Natural Resource Center*

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*People and Nature: Our Future IS in the Balance*

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Bureau of Land Management  
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### **RE: COMMENTS ON THE DRAFT RESOURCE MANAGEMENT PLAN/PEIS FOR THE UPPER MISSOURI RIVER BREAKS NATIONAL MONUMENT**

Dear Monument Team:

On behalf of the National Wildlife Federation (“NWF”) and our four million members and supporters, we thank you for the opportunity to comment on the Draft Resource Management Plan (“RMP”) for the Upper Missouri River Breaks National Monument (“National Monument”). We submit these comments to ensure that the Bureau of Land Management’s (“BLM”) overall vision and goals coordinate with the management requirements set out in the Presidential Proclamation creating the National Monument. NWF is a conservation and recreation organization with a mission to inspire Americans to protect wildlife for our children’s future.

The BLM must manage the National Monument in a manner to preserve the landscape’s general health and historic quality in perpetuity as consistent with Proclamation 7398. The Proclamation explicitly requires the BLM to protect the National Monument’s scientific and historic objects, ensuring the integrity of the values for which the National Monument was created. The BLM must take meaningful steps to protect these wild landscapes against mineral and mining development, overgrazing, irresponsible off-road vehicle (“ORV”) use, and other development or activities that impair or degrade the values for which the National Monument was created.

The National Monument is an integral component of a broader conservation initiative, the National Landscape Conservation System (“NLCS”), which the Department of the Interior created to “conserve, protect, and restore [the NLCS’s] nationally significant landscapes that have outstanding cultural, ecological, and scientific values for the benefit of current and future generations.” The NLCS – a system comprised of lands designated by both presidential and congressional directives – is the largest and most far-reaching conservation initiative in the history of the BLM. We endorse the BLM’s vision for the NLCS as “Great American

Landscapes – healthy, wild and open.” In addition, we encourage the BLM to integrate the NLCS vision for each National Monument RMP, including the Upper Missouri River Breaks. The designation of National Monuments, together with the establishment of the NLCS itself, represents the cornerstone of a new era in land stewardship, a role we hope BLM will embrace rather than ignore.

NWF commends the BLM for recognizing that “...*The Monument is a relatively small but significant part of this region and cannot provide opportunities for all recreational activities on all BLM land while protecting the objects for which it was designated.*” Multiple-use principles do not apply to the National Monument, as described in the proclamation. The National Monument can not be managed for all activities at the expense of the resource. The BLM should adopt an overall vision to promote the National Monument as “remote and nearly undeveloped as it was in 1805,” as described in Proclamation 7398.

NWF strongly encourages the BLM to actively identify, monitor and protect sage-grouse habitats. In February 2005 a new plan for the management and conservation of sage-grouse in Montana was published (*Management Plan and Conservation Strategies for Sage Grouse in Montana 2/1/2005*, 131 pp.). BLM is a signatory to this plan.

The plan contains two pages of specific conservation actions that can be taken for sage-grouse in relation to minimizing impacts from energy development (pp. 60-61). For example, the plan states that energy development projects should:

- “Allow no surface use in nesting habitat within 2 miles of an active lek during the period of breeding and nesting – 1 March-15 June.”
- “Allow no surface use activities within crucial sage grouse wintering areas during 1 December- 31 March.”
- “Developing a comprehensive infrastructure plan prior to energy development activities to minimize road densities.”
- “Avoid locating roads and power lines in crucial sage grouse breeding, nesting, and wintering areas.”
- “Use minimal surface disturbance to install roads and pipelines and reclaim sites of abandoned wells to natural communities.”
- “Locate storage facilities, generators, and holding tanks outside the line of sight and sound of important breeding habitat.”
- “Minimize ground disturbance in sagebrush stands with documented use by sage grouse:
  - a) breeding habitat- the lek and associated stands of sagebrush,
  - b) nesting habitat- stands of sagebrush within 2 miles of a lek, and
  - c) wintering habitat- sagebrush stands with documented winter use by sage grouse with portions that would remain above the snow even during years of deep-snow conditions.”

As signatory to this plan, NWF believes the BLM is obligated to implement these guidelines to

protect and conserve this critical wildlife resource of the Monument.

NWF appreciates that the BLM intends to acquire public access easements from willing landowners. Many designated open roads within the Monument originate on private land and proceed into the public lands. NWF recommends that these roads be closed within three years unless a formal right-of-way easement can be secured, with the exception for management of Proclamation guaranteed uses like grazing leases or gas exploration leases.

NWF commends the BLM for restricting OHV use to existing designated trails and roads that are marked as open. ORV use should be restricted from ecologically and culturally sensitive areas, and limited to suitable designated routes that will result in the least possible impact on the environment or impairment to other legitimate uses of the National Monument.

NWF recommends that BLM reduce the high road density in the National Monument. BLM must preserve the roadless natural characteristics of the National Monument by prohibiting the construction of new roads; prohibiting the upgrading of existing roads; and closing existing roads that are determined to damage land or water resources, conflict with wildlife management, interfere with maintenance of wildlife habitat or which are determined to be inconsistent with the values on the National Monument. The National Monument's current high road density threatens wildlife resources. BLM should manage the National Monument to protect wildlife resource in perpetuity and can begin to do so by reducing road density.

NWF recommends that all airstrips should be removed from the National Monument.

Thank you for this opportunity to provide comments for the National Monument. The Upper Missouri River Breaks National Monument is a "crown jewel" that was specifically established to protect and conserve the abundant natural and cultural values for all Americans to enjoy. We look forward to working with you on the further development of an RMP that will ensure the protection of the healthy, wild, and open landscapes of this truly wonderful National Monument.

Sincerely,



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National Wildlife Federation



Tom France  
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