



Written Comment Form

Bullwhacker Access

Note: Your entire comment, including your address, phone number, e-mail address or other personal identifying information, may be made publicly available at any time. While you can ask us in your comment to withhold from public view your personal identifying information, we cannot guarantee we will be able to do so.

Name:	SUSAN GILBERTZ
Organization:	PRIVATE CITIZEN
Mailing Address:	850 Delphinium Dr
City/State/Zip:	Billings MT 59102
Email Address:	

RECEIVED
 BLM
 2015 MAR -2 PM 1:59
 CENTRAL MONTANA
 DISTRICT OFFICE
 LEWISTOWN, MT

Yes, include me on the mailing list to receive information.

No, do not include my name and address on the mailing list.

All comments must be received or postmarked by March 5, 2015

Please mail or email your comments to:
Upper Missouri River Breaks National Monument
920 NE Main St., Lewistown, MT 59457

blm_mt_public_access@blm.gov

For more information, contact:
Mike Kania, Monument Manager
(406) 538-1950

Thank you for your comments

Comments Instructions

All substantive comments will be addressed. Useful comments are specific, mention particular pages where appropriate, and address one or more of the following: inaccuracies or discrepancies in information; identification of new information relevant to analysis; identification of new impacts, alternatives, or mitigation measures; specific suggestions for improving management direction.

I attended the public meeting in Billings having no understanding of the history or current circumstances of the issues regarding the "Bullwhacker" lands held within the Upper Missouri River Breaks Nat. Monument. Having listened to the presentation & the public comments made there, I wish to have the following comments entered as public input:

- (1) I am greatly saddened that the court case was never pushed to the Supreme Court as it seems **clear** public access according to law had been established across the Bullwhacker by historic use.
- (2) The notion of building a road around the Bullwhacker property appears a premature solution as the owners are willing to re-visit the land trade possibility.
- (3) Trading of public lands ~~for~~ for private holdings is very tricky, and I remind the BLM that the trade must ~~be~~ assure the public access to lands →

of equal or better quality. ~~with the~~

(4) All 'grumbly's' aside, a trade in this case is apparently advantageous for the larger public; please resist this option in hopes of finding a more palatable trade.

(5) Not everyone will be satisfied w/ a trade, but the larger public interests may legitimately overshadow the interests of a few hearty young men who can access "public land" when no one else can get there without a helicopter



Written Comment Form

Bullwhacker Access

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2015 JAN 30 PM 1:17

Note: Your entire comment, including your address, phone number, e-mail address or other personal identifying information, may be made publicly available at any time. While you can ask us in your comment to withhold from public view your personal identifying information, we cannot guarantee we will be able to do so.

Name:	Elmer Kutzler
Organization:	
Mailing Address:	2415 Heritage Drive
City/State/Zip:	HAure MT 59501
Email Address:	e-kutzler@yahoo.com

CENTRAL MONTANA
DISTRICT OFFICE
LEWISTOWN, MT

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I would like to express my comments regarding the Bullwhacker Access. This access should have not been closed in the first place! But if BLM will not fight it further and presents building a new access, I would express the East side bypass Road described in the EA & would urge proceeding with the construction as soon as possible. It has been closed for too long now the public had access for many, many years & closure of the road by a Judge not knowing what he is talking about & does not mean BLM is relieved of its responsibility to provide ~~the~~ public access. I feel the BLM contributed to the loss of this historic access by failure to defend the access when it was challenged in state court. App 59,000 acres is without motor vehicle access because of what the Wilkes brothers have done. After completion of the new access, BLM should close the short strip of original road (Bullwhacker Road) on the BLM land between the new route and the south boundary of the Wilkes property. After what they have

(Wilkes) over

done, it would serve them justice, not to have access to their parcel of land at all!

I think all would agree that reopening of the original Bullwacker Road would be the best outcome. Unfortunately that option seems not achievable given the facts at work now and foreseeable future, unless the Willks brother want to join people of Montana & leave Texas behind.

The construction of a new bypass Road around the Willks Property is quite feasible. As I have been in, and hunted the area for 45 years, the East Side Route offer is the most physically adaptable route and seems to be about half the cost of the west route. BLM could obtain a public private Partnership funds to mitigate costs.

Everyone I have discussed the route with, all say it needs to reopen soon.

my Interests are very simple. Build a new bypass Road on the East Side of the Bullwacker.

Thank you for your time

Elmer Kutzler
2415 Heritage Drive
HAURE MT 59501

RECEIVED
BLM

18 Feb 2015

BLM

2015 FEB 20 PM 1:33

Lewistown, Montana

Bullwhacker Scoping

CENTRAL MONTANA
DISTRICT OFFICE
LEWISTOWN, MT

Please accept these comments FOR
the Record Regarding
"Bullwhacker Scoping"

I think that the idea of a
New Road is truly Bad. IT
would be expensive, destructive
to the monument, destructive
to wildlife habitat and require
expensive maintenance over the
years.

The Monument is all about
the landscape, the history, the
wildlife and the fact that
it should be held to a higher
standard of protection than
plain old BLM Land.

I think the BLM should
instead explore the possibility
of a land exchange so that
the existing road would provide
access.

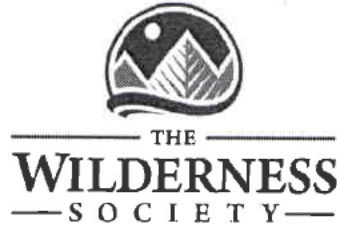
over

OR what about
building a trail for foot,
horse OR bicycle access.
this would best preserve the
wild in the Bullwhacker.

Please — NO New Road
this would tear up
the Bullwhacker and reduce
the amount of viable
wildlife habitat, decrease
the wild, special remote
feel of the area and
not fit in with the
way the monument
should be managed.

Thanks —

Tom Kilmer
621 2nd Street
Helena
Montana



March 5, 2015

Mike Kania, Monument Manager
Upper Missouri River Breaks National Monument
920 Northeast Main
Lewistown, MT 59457
(406) 538-1950
mkania@blm.gov

Sent via email to blm_mt_public_access@blm.gov

RE: Access to the Bullwhacker Coulee Area of the Upper Missouri River Breaks National Monument

Dear Mr. Kania,

Please accept and fully consider these scoping comments and recommendations on behalf of The Wilderness Society (TWS) regarding BLM's proposal to create opportunities for access to the Bullwhacker Coulee Area of the Upper Missouri River Breaks National Monument. TWS has a deep interest in balancing the recreational access needs of the monument while protecting the objects and values that the monument was created to protect. We believe there is a path forward that can allow BLM to fulfill both of these objectives, as set out in the following comments and recommendations.

I. Balancing Recreation Access and Protection of the Monument

The Bullwhacker Coulee Area of the monument contains extraordinary opportunities for hunting, hiking, wildlife watching, camping and other activities due to the incredible wildlife, cultural and wilderness resources within the area. As acknowledged in Proclamation 7398, the Bullwhacker Area of the monument:

contains some of the wildest country on all the Great Plains, as well as important wildlife habitat. During the stress-inducing winter months, mule deer and elk move up to the area from the river, and antelope and sage grouse move down to the area from the benchlands. The heads of the coulees and breaks also contain archeological and historical sites, from teepee rings and remnants of historic trails to abandoned homesteads and lookout sites used by Meriwether Lewis.

As the resource management plan for the monument states: "The recreation emphasis will be to develop and maintain opportunities for dispersed recreational activities such as

hunting, hiking, scenic and wildlife viewing and driving for pleasure, consistent with current policies and practices and the Proclamation.” Monument Management Plan at 61. This is consistent with BLM policy for the National Landscape Conservation System (National Conservation Lands), which ensures that the National Conservation Lands “will be available for a variety of recreation opportunities, to the extent consistent with the designating legislation or proclamation and other applicable law.” BLM Manual 6100 at 1.6(M)(1). This guidance shows that allowing for appropriate recreational access is important to experiencing the monument objects and values.

Consistent with BLM’s broader stewardship mandate for the monument as stated in Proclamation 7398, designated roads and trails in the monument must be “located to minimize impacts to sensitive resources, *enhance visitor recreation experiences*, and conserve, protect, and restore the values for which [the monument] w[as] designated.” Manual 6100, § 1.6(M)(2) (emphasis added). BLM may “only develop new facilities, including roads . . . where they are required under law, required for public health and safety, are necessary for the exercise of valid existing rights or other non-discretionary uses, prevent impacts to fragile resources, or further the purposes for which an area was designated.” BLM Manual 6100, § 1.6(I)(3); *see also* BLM Manual 6220, § 1.6(F)(3) (similar language); 15-Year Strategy, at 11 (same).

In addition to BLM’s specific mandate to minimize impacts from designated routes in the monument is the agency’s general duty to locate routes to protect public lands resources pursuant to Executive Order No. 11,646, 37 Fed. Reg. 2877 (Feb. 9, 1972) and Executive Order No. 11,989, 42 Fed. Reg. 26,959 (May 25, 1977). Pursuant to those orders, BLM regulations require that designated ORV “areas and trails shall be located:”

- 1) “to minimize damage to soil, watershed, vegetation, air, or other resources of the public lands, and to prevent impairment of wilderness suitability;”
- 2) “to minimize harassment of wildlife or significant disruption of wildlife habitats;” and
- 3) “to minimize conflicts between off-road vehicle use and other existing or proposed *recreational uses* of the same or neighboring public lands, and to ensure the compatibility of such uses with existing conditions in populated areas, taking into account noise and other factors.”

43 C.F.R. § 8342.1(a)-(c) (emphasis added). A number of federal courts have held that BLM and other federal land management agencies must *apply* these so-called “minimization criteria” route-by-route and *articulate* a reasonable basis for concluding that each designated route minimizes impacts to important resources.¹ If the minimization

¹ *See, e.g., S. Utah Wilderness Alliance v. Burke (SUWA)*, 981 F. Supp. 2d 1099, 1104-06 (D. Utah 2013) (“Acknowledging the minimization standards is not the same as applying them.”); *Idaho Conservation League v. Guzman*, 766 F. Supp. 2d 1056, 1071-74 (D. Idaho 2011) (“[r]ecord does not demonstrate whether or how [the agency] implemented and incorporated the minimization criteria” under analogous Forest Service regulations); *Ctr. for Biological Diversity v. BLM*, 746 F. Supp. 2d 1055, 1071-81 (N.D. Cal. 2009) (detailed survey and inventory of routes

criteria are applied correctly, the Bullwhacker Area will have less recreational conflicts and enhanced experience to the wildlife and backcountry resources that users seek out in this area.

Section 106 of the NHPA requires federal agencies to “take into account the effect of [any] undertaking on any district, site, building, structure, or object that is included in or eligible for inclusion in the National Register [of Historic Places].” 16 U.S.C. § 470f. It is well established that road designation and construction constitutes an “undertaking” subject to the requirements of section 106. See 36 C.F.R. §§ 800.3(a), 800.16(y) (undertakings include any permit or approval authorizing use of federal lands); BLM Instruction Memorandum 2012-067 (Feb. 10, 2012) (“BLM considers designations of travel areas, roads and trails to be undertakings for purposes of Section 106”); 79 Fed. Reg. at 61,095 (NOI acknowledging intent to comply with section 106). The Ninth Circuit Court of Appeals has required BLM to conduct Class III cultural resource surveys for roads, ways and airstrips in the monument that have not been surveyed previously or were surveyed decades ago. *Mont. Wilderness Ass'n v. Connell*, 725 F.3d 988, 1009 (9th Cir. Mont. 2013). Thus, any new road proposed in the monument will require a full Class III survey before construction of the road.

Recommendations: Providing recreational access and protection of the monument objects and values are not mutually exclusive and are complementary goals if balanced in an appropriate manner. BLM must follow all laws, regulations and policies for analyzing and protecting monument objects and values to ensure the protection of natural and cultural resources. This includes inventory and protection of the monument objects and resources, application of the minimization criteria for motorized use and Class III surveys for cultural resources. If done right, compliance with these mandates will lead to enhanced recreational experiences as contemplate by the laws and policies themselves.

II. Recommended Approach for Access to the Bullwhacker Coulee Area

A. BLM should pursue the land exchange as its preferred alternative

We were pleased to see in a recent article that BLM is willing to reconsider a land exchange proposal to allow for access that did not go forward last year.² Access on the existing road through acquiring the road and land underlying and adjacent to the road will provide the best protection to the monument while allowing the historic access to the Bullwhacker Coulee Area. We strongly recommend that BLM pursue the option of a land exchange with the current owners of the property as the agency’s preferred alternative for the proposed action. If the land exchange proves to be ultimately unviable, and access must include construction of a new road across BLM-managed land, then BLM should

inadequate where “there is nothing in the record to show that the minimization criteria were in fact applied when OHV routes were designated”).

² “BLM Willing to Consider Controversial Missouri Breaks Proposal,” *Billings Gazette* (Jan. 15, 2015). Available at: http://billingsgazette.com/lifestyles/recreation/blm-willing-to-consider-controversial-missouri-breaks-proposal/article_68f8e505-b874-554b-bbfb-a8bc630b45fa.html

propose a mitigation strategy that results in a net gain for conservation to the monument objects and values.

B. If a new road is necessary, then BLM should mitigate impacts that result in a net gain for conservation

As stated above, in the case that a land exchange cannot go forward as a viable alternative, BLM should apply the full mitigation hierarchy to the proposed action, including avoidance of impacts being paramount. In the scoping notice for the proposed action, BLM states that it “would consider mitigation, including the option of closing, rehabilitating, or reclaiming other existing roads to off-set the resource disturbance. The intent would be to ensure no net gain in the present miles of road with in the area.”³ While the BLM’s initial thinking of off-setting resource disturbance is promising, the conservation mandates of the monument proclamation require more than a “no net gain” of roads and resource damage. Rather, because the monument is managed to conserve, protect and restore the monument objects and resources, disturbance should be mitigated by creating a net gain for conservation, protection and restoration of the monument to ensure the monument is better off than before the disturbance.

BLM should be looking at the broader landscape for ecological connectivity and resilience when examining mitigation options for the proposed action. Secretarial Order 3330 requires the development of a landscape-scale mitigation policy for the Department of Interior. In a report to the Secretary of Interior, the Energy and Climate Change Task Force laid out a landscape approach to mitigation.⁴ This approach contained the following steps:

1. Identifying key landscape attributes, and the conditions, trends and baselines that characterize these attributes;
2. Developing landscape-scale goals and strategies;
3. Developing an efficient and effective compensatory mitigation programs for impacts that cannot be avoided or minimized; and
4. Monitoring and evaluating progress and making adjustments, as necessary, to ensure that mitigation is effective despite changing conditions.

In addition to the Department’s direction on landscape-level mitigation in general, BLM Manual 6100 directs that the National Conservation Lands “will be managed as an integral part of the larger landscape” and that “BLM will work to maintain and promote ecological connectivity and resilience.” BLM Manual 6100, § 1.6(A)(6) & (A)(8).⁵

³http://www.blm.gov/mt/st/en/info/newsroom/2014/september/blm_starts_process.html

⁴ Clement, J.P. et al. 2014. A strategy for improving the mitigation policies and practices of the Department of the Interior. A report to the Secretary of the Interior from the Energy and Climate Change Task Force, Washington, D.C., 25 p.

⁵ See also Secretarial Order No. 3308, § 4(b) (BLM must manage NCLS units “as an integral part of the larger landscape . . . to maintain biodiversity, and promote ecological connectivity and resilience in the face of climate change”); 15-Year

Thus, in order to achieve a net gain in conservation for the monument from the proposed action, BLM should evaluate the surrounding landscape for area road closures and reclamation efforts that will promote both conservation and recreational access to the objects and values of the monument. This can be achieved by showing how recreational access will be improved for the relevant surrounding by the construction of the new access road as well as showing how habitat connectivity and access to backcountry recreation experiences improve by the closure and reclamation of certain other areas to roads in the Bullwhacker Coulee Area.

Recommendations: We strongly urge BLM to pursue the land exchange as the preferred solution for renewing access to the Bullwhacker Coulee Area. Recognizing that this is not entirely under BLM's control, if the land exchange proves unviable, then BLM should apply a landscape-level mitigation strategy that mitigates impacts from the new access road through a strategy of avoidance and area closures and reclamation to provide enhanced access while providing a net gain for the conservation, protection and restoration of monument objects and values.

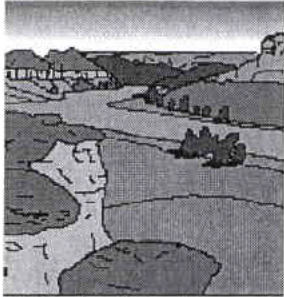
Conclusion

We greatly appreciate the opportunity to provide input on this important issue. We believe there is a path forward that will lead to enhanced recreational access while adhering to the conservation mandates of the proclamation. We look forward to participating in this process. Please contact us with any questions you may have.

Sincerely,



Phil Hanceford
Assistant Director
The Wilderness Society | BLM Action Center
1660 Wynkoop Street, Suite 850, Denver, CO 80202
303.225.4636
phil_hanceford@twso.org



**Friends of the Missouri
Breaks Monument**

March 4, 2015

Bureau of Land Management
Attn: Mike Kania, Manager, Upper Missouri River Breaks National Monument
920 NE Main
Lewistown, MT 59457

Sent by email to blm_mt_public_access@blm.gov. This text has clickable links to websites and documents.

RE: Access to the Bullwhacker area of the Upper Missouri River Breaks National Monument

Dear Mr. Kania:

Thank you so much for the opportunity to submit scoping comments on BLM's process to regain access to the Bullwhacker area of the Upper Missouri River Breaks National Monument.

The Friends of the Missouri Breaks Monument is the 501(c)(3) non-profit organization that supports, protects and preserves the Monument. We represent several hundred members and supporters in central Montana and beyond. Our combination of steady advocacy, respect for the working landscape, and devotion to responsible access has made us a leader in the Friends Grassroots Network, the network of similar "friends" groups that steward BLM monuments and national conservation areas throughout the American West.

But we are not simply hollow champions of this Monument. We've put in our own time and money into restoring the river corridor in cooperation with BLM and other partners. We've invested tens of thousands of dollars in the Monument, by raising private funds to remove invasive salt cedar, recruiting volunteers to plant cottonwood trees, and supporting both private and public riparian pasture projects along the river. Last year alone we donated more than \$25,000 in volunteer labor to the Breaks.

We're offering scoping comments because we are dedicated to the vision of the Missouri Breaks Monument that was laid out in the Monument Proclamation. As the agency moves to regain access to the Bullwhacker area, we'd like to take this

opportunity to ask BLM to consider not only the Proclamation, but also the objects of the Monument, agency manuals, and other guiding documents.

Alternatives we prefer, and why:

1. BLM considering a land swap to make the private Bullwhacker parcel public.

While there is no proposal on the table as of this writing, we support the concept of a swap.

- It would protect the Monument by getting rid of the need to build a 50-foot wide, 5.5+ mile long new road and a new road's associated diminishment of habitat for mule deer, elk, antelope, sage grouse and other wildlife.
- It would make the Bullwhacker parcel public.
- **Out of all the alternatives, this alternative provides the best and perhaps only chance of seeing the Bullwhacker Road re-opened in the near future, possibly as soon as hunting season 2015.** (The landowners have indicated that they will re-open the road if there's progress on a swap.)
- It would allow road access to 50,000+ acres of public land in perpetuity. The Friends have never disputed the existence of the Bullwhacker Road. Our mission includes "advocating for responsible access," – advocating for the existing road fits in with our mission. We want people to be able to use this road and the surrounding area, to hunt, hike, birdwatch, camp, haul cows, etc – whatever reasonable activity that doesn't tear up the land or break the law.
- It would set a most welcome precedent that BLM is taking action on its 2008 (and earlier) pledges to work with counties, the state, and landowners to ensure public road access to the Monument. Only about 20 percent of roads in the Monument are truly public – ie, they don't cross private land, they don't cross state parcels. BLM has taken no action on this since the designation of the Monument in 2001. We think the Bullwhacker Road – the main thoroughfare north of the river, a road whose existence we've always supported – would be the perfect place to start the process.

We would support any land swap that is in the public interest, as per [BLM's criteria](#) for what is in the public interest. Please [click here for the full text of the law governing land exchanges](#).

We would also support swap proposals that 1) give the public a net gain of public land, 2) provide benefit to the wider public south of the Monument, and 3) preserve the North American Model of Wildlife Conservation, in which wildlife are held in the public trust (in our case, managed by the State of Montana).

2. BLM taking no action on building a bypass route. The public could access the area by using the three area airstrips (or via the Missouri River).

While this alternative would not make the Bullwhacker public, or allow road access to the area, the three public airstrips in the area would provide ample access into the Bullwhacker. All three of these airstrips are legal, public airstrips that appear on the [Montana Aeronautical Chart](#).

It's been argued in the past that air access equals public access. We don't agree. (We think that true public access should require no more than a car or truck – and your legs or bike or canoe, if you like.) But if air access is considered good public access for BLM parcels outside the Monument, air access should be considered good public access for BLM's Monument lands as well.

This alternative would also protect the Monument, by obviating the need for a major new road that would cut up habitat for the mule deer, elk, antelope and sage grouse mentioned as objects of the Monument in the 2001 Proclamation.

Alternatives we don't support, and why:

We do not support either bypass route (east side or west side) BLM is proposing.

1. Neither route fits in with the Monument Proclamation, or with BLM management guidelines.

- We don't understand how a new road fits in with the Monument proclamation.

The Bullwacker area of the monument contains some of the wildest country on all the Great Plains, as well as important wildlife habitat. During the stress-inducing winter months, mule deer and elk move up to the area from the river, and antelope and sage grouse move down to the area from the benchlands. The heads of the coulees and breaks also contain archeological and historical sites, from teepee rings and remnants of historic trails to abandoned homesteads and lookout sites used by Meriwether Lewis. (Establishment of the Upper Missouri River Breaks National Monument – A Proclamation, January 17, 2001.)

- We don't understand how a new road fits in with BLM's policy manuals on national monuments.

Land use planning decisions for each ... unit must be consistent with the purposes and objectives of the designating proclamation or Act of Congress. (BLM Manual 6100 – National Landscape Conservation System, p. 1-6.)

The BLM will only develop new facilities, including structures and roads, within Monuments and NCAs where they are necessary for public health and safety, are required under law, are necessary for the exercise of valid existing rights or other non-discretionary uses, prevent impacts to fragile resources, or further the purposes for which an area was designated. (BLM Manual 6220 – National Monuments, National Conservation Areas, and Similar Designations, p. 1-11.)

- We don't understand how a new road fits in with BLM's national strategy for managing monuments.

All ...units are designated in keeping with an overarching and explicit commitment: to conserve, protect, and restore natural and cultural resources as the prevailing activities within those areas, shaping all other aspects of management. To provide for uses that are compatible with landscape and resource values, ...managers will focus on conservation as the primary consideration in planning for and management of NLCS lands, consistent with designating legislation. (The National Landscape Conservation System, 15-year Strategy, 2010-2025, p. 3.)

- We don't understand how a new road fits in with BLM's state strategy for managing monuments.

Goal 1A: Clearly communicate that the conservation, protection, and restoration of NLCS values is the highest priority in NLCS planning and management, consistent with the designating legislation or presidential proclamation. (BLM Montana/Dakotas, National Landscape Conservation System, Three-Year Strategy, 2013-2015, p. 3)

2. Neither route would protect the objects of the Monument.

The Proclamation specifically mentions elk, mule deer, antelope, sage grouse, and archaeological and historical sites as objects of the Bullwhacker, and therefore the Monument. BLM is tasked with protecting the objects of the Monument. The Friends' mission is to protect the Monument (and therefore the objects within it).

We haven't heard from BLM how building a new road in the Monument would protect the Monument or its objects. Particularly when studies show that roads are a detriment to both the wildlife habitat and the archaeological/historical sites that BLM is supposed to be protecting.

- Studies show that road density is terrible for wildlife habitat, particularly for elk, listed specifically as an object of the Bullwhacker (and of the Monument). Click here to read a study specifically about the Breaks. You can also Google search other studies. We don't understand how a new road – in an already very densely roaded area – will protect the objects of the Monument.
- We also question how a new road would protect the Greater Sage-grouse, which is on the verge of being listed under the Endangered Species Act.
- And we question how a new road will protect archaeological, cultural and historical objects of the Monument. Studies show – click here for an example – that proximity to roads is a factor in vandalism of archaeological sites.

3. Neither route is financially prudent for the American taxpayer, or for the BLM.

- BLM said at the January scoping meeting in Billings that the east side bypass – 5.8 miles, through three major coulees, and requiring 43 culverts, would cost roughly \$600,000. BLM said the west side route, with 61 culverts, would cost 40-50 percent more. Neither of these rough estimates includes maintenance costs. BLM Central Montana District Manager Stan Benes said at the meeting, “We do not have the budget to build this road.” We are wondering where the money is going to come from.
- Given that BLM operates on tight budgets, we would be curious to know what projects, programs or focus areas will be cancelled or delayed due to this road-building project. The Friends and our volunteers are particularly concerned about the fate of our cottonwood restoration collaborative with the Friends, BLM and the Conservation Districts Council if BLM has to pay for and staff this road-building project.

4. The EA process around building these routes is not enough, considering the impact either route will have on the objects of the Monument.

The following items delve more into BLM process under the rules the agency follows as stewards of our public lands. We are questioning whether BLM should be doing what's called a full Environmental Impact Statement (EIS), rather than just an Environmental Assessment (EA).

- Why is BLM doing an EA, as opposed to a full Environmental Impact Statement (EIS)? Under the EA process, providing the public with an initial draft to comment on is optional.
- Will there be an opportunity to comment on a draft of the Environmental Assessment (EA) once it is completed?
- How does BLM envision ending this EA process with a Finding of No Significant Impact? It's difficult to see how BLM will be able to do this on a plan to build a new five-mile road in a national monument.

Thank you again for the opportunity to provide scoping comments. Please let me know if you have any questions or concerns regarding this letter. We would be happy to discuss our recommendations further.

Sincerely,



Beth Kampschorr
Executive Director
beth@missouribreaks.org



Kania, Michael <mkania@blm.gov>

Trails to the Bullwhacker

1 message

Mary <mfrieze@midrivers.com>

Mon, Dec 15, 2014 at 9:28 AM

To: jconnell@blm.gov

Cc: blm_mt_public_access@blm.gov, mkania@blm.gov, gbeyersd@blm.gov, gbenes@blm.gov, Zane Fulbright <zfulbrig@blm.gov>, mrschaef@blm.gov, Mark Good <mgood@wildmontana.org>, Beth Kampschror <bkampschror@gmail.com>

Dear Ms. Connell,

Two weeks ago, on December 1st, I emailed a letter to you concerning restored vehicle access to the Bullwhacker. That was before I attended the BLM Lewistown scoping meeting on this issue. I've since that meeting reversed my opinion about the proposed road to the Bullwhacker. I sincerely do not believe there should be a new road in the Missouri Breaks. Not building a road is actually a very reasonable solution to the problem. At the scoping meeting several people voiced the opinion that a trail (or trails) leading to the Bullwhacker area to be an excellent idea.

My attached letter pertains to this proposal of access by trail. I believe this is the best possible solution – it also opens up an excellent way to protect the land and objects in this large area of our Monument.

Please seriously consider the ideas in the attached letter. **Also, please disregard and destroy my letter written on December 1, 2014.**

Thank you very much.

Sincerely,

Mary Frieze



This email has been checked for viruses by Avast antivirus software.
www.avast.com



Trail to the Bullwhacker.docx
41K

1116 West Evelyn Street
Lewistown, Montana 59457
12/15/2014

Ms. Jamie Connell, State Director
Montana State Office
Bureau of Land Management
5001 Southgate Drive
Billings, MT 59101

Dear Ms. Connell:

I do not believe that a new road should be built to restore public vehicular access to the Bullwhacker area in the Upper Missouri Breaks National Monument (UMRBNM). There should not be new road construction in the Bullwhacker.

On December 4th I went to the BLM scoping meeting in Lewistown about the construction of this road. BLM personnel led an excellent public discussion about the possible routes for the road, and they showed slides of the terrain for the two most feasible routes. Prior to this meeting I was in favor of such a road as long as BLM decommissioned other roads to result in a no-net increase in total vehicular road mileage within the UMRBNM boundaries. (You may remember that I stated this opinion in a letter I emailed to you on December 1st. I also Cc'd other people concerned with this issue, and I have Cc'd the same people today.)

While I viewed the BLM slides of the wild lands through which this road would pass, I learned of the destruction to those lands this road would cause. Also I learned of the enormous cost and the difficulties of building the road, and I came to realize that this road should not be built – not on the two most feasible routes, nor on any other route.

On March 25, 2011, the Montana 17th District Court decreed as private a four mile section of a road through the Anchor Ranch. Prior to this decree, the public drove south four miles through the Anchor Ranch to access the Bullwhacker area. People must now park their vehicles north of the Anchor Ranch and walk (or ride horseback) to the Bullwhacker area.

The Bullwhacker area is not now, nor has it ever been, inaccessible to the public. Each year people visit by airplane, boat, horse, and on foot. The Missouri Breaks are rough and wild land, and even before the court's decision once a person was away from the motor vehicle, airplane, or boat, extensive and arduous hiking (or horseback riding) was necessary to move about in the Bullwhacker. For the driving public, not building the road will only mean that once the car or truck is parked people have a few miles further to walk or ride horseback.

During the discussion at the meeting on December 4th people noted that there are no designated hiking trails in the Monument, and that the wording of the 2001 presidential proclamation that established the UMRBNM does not prohibit trails. Out of this came an excellent alternative to the proposed road construction: the creation of a trail system in place of the road.

The two most feasible routes for the proposed roads would make a wonderful trail system. One of these routes is to the East of the portion of the Anchor Ranch with the court decreed private road, and the other is to the West. This trail system would give designated access to the Bullwhacker, and each trail would lead the visitor through some grandly wild country with much less disruption to the landscape than the proposed road.

South of the closed Anchor Ranch road the original BLM road to the Bullwhacker still exists, and the trail routes join together there. At this juncture, a campsite with a fire pit could be located, and others could be strategically located along each trail. Also, at the North end of the Anchor Ranch road closure, it will be necessary to provide the public with a parking lot at each trail head, several campsites with fire pits, and a toilet.

The original BLM Bullwhacker Road passes the Gilmore cabin about eight miles southwest of the southern end of the closed Anchor Ranch road. This cabin has been beautifully restored by BLM in recent years and is an excellent place to stay. However, the pit toilet at the Gilmore is all but falling over, and with the building of the new trail system, this toilet must be replaced, and the horse corrals should be rebuilt.

If a road were built to bypass the Anchor Ranch road, it would come with a huge price tag. Building trails is much less expensive and could be paid for, with money left over, by the funds set aside since March 2011 for maintenance of the Anchor Ranch road. This "left over" money could pay for more trail construction and/or needed mitigation projects throughout the Missouri Breaks.

Since 2011 there have been fewer vehicles in the Bullwhacker and the creation of such a trail system bypassing the Anchor Ranch road will continue this trend. The BLM Approved Resource Management Plan (RMP) map shows many miles of roads in the Bullwhacker, both closed and open to motorized vehicles. All of these roads start with the original Bullwhacker Road and dead end to public use after several miles. Prior to 2011 people continued to drive not only on the open roads, but also on the closed roads. A trail system as access to the Bullwhacker will facilitate BLM in meeting the RMP goal of effective road closure. Ideally, many of these roads will be officially transformed into designated trails.

Together, the closure of the Anchor Ranch road and the creation of this trail system create a marvelous opportunity for the public in the use and enjoyment of the Breaks, and for BLM in the protection and preservation of our National Monument. In the 2001 presidential proclamation that established the Monument, BLM was tasked with preparing "a transportation plan that addresses the actions, including road closures or travel restrictions, necessary to protect the objects identified in this proclamation."

As of 2001, BLM was given special directives on how to manage the Missouri Breaks Monument. BLM personnel, with no exception, have a mandate to manage our Monument and everything in it according to the proclamation – it is not to be treated the same as the rest of BLM land. This land was "set apart and reserved as the Upper Missouri River Breaks National Monument, for the purpose of protecting the objects identified above, all lands and interests in lands owned or controlled by the United States" within its boundaries.

Please disregard and destroy my previous letter written on December 1, 2014.

Sincerely,

Mary Frieze

406-535-7380 mfrieze@midrivers.com

cc: Upper Missouri River Breaks National Monument, Stan Benes, Geoff Beyersdorf, Zane Fulbright, Mike Kania, Mark Schaefer, Beth Kampschorr, Mark Good



Kania, Michael <mkania@blm.gov>

Matt's comments regarding Bullwhacker road

1 message

Plagenz, Matthew J -FS <mplagenz@fs.fed.us>

Fri, Dec 5, 2014 at 12:58 PM

To: "Stan Benes (gbenes@blm.gov)" <gbenes@blm.gov>, "Beyersdorf, Geoff" <gbeyersd@blm.gov>, "mkania@blm.gov" <mkania@blm.gov>

My two cents worth from your meeting last night:

- 1) Do not build the road. Too much money, maintenance, and possibly too much litigation.
- 2) Encourage local sportsman (Birdwell, Schwomeyer, Kring) to engage with Wilks's representatives on working together towards possible land exchange proposal. If these two groups can come to an agreement on something then I think you have a realistic chance of wider public support from folks in Fergus County and Montana in general. The sportsmen group will do a good job getting feedback from other local sportsman as negotiations occur. Don't take this as an insult but, any proposed land exchange that is *perceived to be* brought forward specifically from the BLM and/or the Wilks Ranch will not be supported by most folks. It is the culture around these parts. Let it be the Sportsman's thoughts and ideas and success has a chance. Although, the BLM can and should be a part of the working group from "the outside". Particularly helping communicate to the public the progress as these two groups negotiate towards a formal land exchange proposal.
- 3) Request Wilks's as a good faith gesture to re-open the Bullwhacker road while negotiations with Sportsman are occurring.
- 4) I also liked the idea of some trailhead development. If this particular part of the monument is largely going to be non-motorized then let's develop some trailheads to accommodate livestock use, etc.....

Good Luck!



Matt Plagenz
Zone Fire Management Officer (Detail)

Forest Service

Lewis and Clark National Forest ,
Judith/Musselshell Ranger Districts

p: 406-538-1922
c: 406-868-7425
mplagenz@fs.fed.us

920 NE Main Street
Lewistown, MT 59457
www.fs.fed.us



Caring for the land and serving people

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Kania, Michael <mkania@blm.gov>

Bullwhacker road

1 message

Clint Loomis <cloomis@midrivers.com>

Mon, Dec 1, 2014 at 11:33 AM

To: jconnell@blm.gov

Cc: gbenes@blm.gov, gbeyersd@blm.gov, Zane Fulbright <zfulbrig@blm.gov>, "Kania, Michael" <mkania@blm.gov>, mrschaef@blm.gov, Mark Good <mgood@wildmontana.org>, Beth Kampschror <beth@missouribreaks.org>

Dear Ms. Connell:

I am disappointed that a land swap could not have been made that would have maintained the present road. I know an exchange at one time was possible. This new road goes against the original proclamation. It feels like BLM is not treating the Monument as land designated to preserve its wilderness characteristics and honor the intentions of the Antiquities Act, but rather acting as if it were just another parcel of BLM land. I don't know how the upper levels of management particularly in the Billings office reached this decision. The decision flies in the face of best practices.

That being said, I also feel it would be a travesty to the American public if this vast chunk of OUR land is left inaccessible or worse yet available only to those who have the money to fly in or the means to access it by boat/canoe. In my mind a way into the area is very important, but I too wonder at what cost to both the public's pocketbook and more importantly to the management of the land and the wildlife.

I know the Breaks currently doesn't have a single hiking trail. Wouldn't it be less expensive, and more exciting to all who enjoy the area to have a jewel of a hiking trail developed in the heart of the Monument? I know this area and how difficult it is to maintain the roads. The placement and construction is going to require serious expenditure of funds and its annual upkeep will also stress the BLM budget. Wouldn't it be better to build a hiking trail, and use the rest of the money to obliterate some of the 'red' roads after they've been surveyed for potential archeological value? In discussions with BLM staff, the question of why the 'red' roads haven't been closed thus far has always led back to not having enough money or staff. The Friends have offered to assist; the Conservation Corps can be hired. With the money the road is going to cost, archeologists and temps. could be hired to do the job of eliminating the roads BLM has sought for years to remove from the Monument.

It is because the proclamation for the Wild and Scenic Missouri Breaks National Monument is not as detailed as those of other Monuments, that it takes exceptional leadership to protect this unique American treasure and with that strengthen the citizens' trust in the BLM to manage our public lands according to the intent of the Monument's proclamation. I do sincerely hope this is of the highest priority when you and your staff finalize plans for providing access into the Bullwhacker area.

12/15/2014

DEPARTMENT OF THE INTERIOR Mail - Bullwhacker road

Sincerely,

Clint Loomis (citizen)

Lewistown, Mt



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Kania, Michael <mkania@blm.gov>

Re: Bullwhacker

1 message

Benes, Gary <gbenes@blm.gov>

Tue, Jan 27, 2015 at 10:55 AM

To: Mike Penfold <penrodmt@gmail.com>, Michael Kania <mkania@blm.gov>

Thanks very much Mike. I appreciate your comments. I thought your discussion of the area and the opportunity available to the public, at the Billings meeting, was excellent and well stated. Yes, there is indeed far more to it than elk hunting and right of way. I am hopeful that an exchange option can be developed by a working group of all interested parties in the next couple months. As we mentioned at the meetings, and as you state again here, them old timers put the road in the best place. The best solution would be to regain access to that same road.

Gary L. "Stan" Benes
Central District Manager
Bureau of Land Management
Lewistown, Montana 59457
Ph: 406-538-1900

On Tue, Jan 27, 2015 at 8:54 AM, Mike Penfold <penrodmt@gmail.com> wrote:

Stan Benes, BLM District Manager

Mike Kania, Monument Manger

Reference: Bull whacker Road

Dear Stan and Mike,

We appreciate you having a meeting on the Bullwhacker issue in Billings. The potential of a land exchange had not had a public discussion before this meeting. I was pleased that you have decided to put the land exchange back into consideration for the Bullwhacker access alternatives. This letter is to confirm my comments made at that meeting at Lewistown and Billings. My recommendation for alternatives to consider for access to Bullwhacker is as follows:

1. Build new road around Anchor Ranch.
2. Acquire the Anchor Ranch by land exchange or purchase.
3. Build walking trial around Anchor Ranch.
4. Acquire Right-of-Way by eminent domain.

Please consider a few other thoughts. I strongly prefer acquiring the Anchor Ranch. The Bullwhacker/Cow Creek areas have very diverse wildlife habitat and is the largest contiguous parcel of BLM land in the State. This broader Bullwhacker/Cow Creek area has amazing public use options considering it is in the National Monument, National Wild and Scenic River has part of the Nez Perce National Historic Trail. The area has many cultural sites and has habitat for a wide range of wildlife including deer, elk, bighorn sheep, sage grouse, prairie dog, bird of prey and others. Recreation and hunting opportunities are diverse.

It seems that opponents of the land exchange have tended to see the issue as trading elk hunting for a right of way. A more appropriate way to consider the acquisition is to understand that the Anchor Ranch is a keystone property for the entire area. Acquisition of the Anchor Ranch opens up a wide array of public recreation and wildlife management opportunities. It was important to hear the Wilks family is willing to continue negotiations on a possible land exchange and the additional options that open access to other public land. I have felt that most of the public have not understood the complete land exchange proposal and the public values associated with it. Better public understanding of the overall exchange proposal would be desirable.

I have hunted and recreated in the Breaks for 30 years. I have spent much time on roads in the Breaks. Your staff's presentation at the meetings identified the difficulties of building and maintaining a new road. The old timers knew where to put roads in this break type country and that is where the current road is. Your EA or EIS analysis will clearly show that building new roads around the Anchor Ranch is an expensive option and environmentally the most impacting.

While Durfee Hills has important elk habitat and hunting, its public access is by air, which severely limits its public use. When I was with BLM here in Montana, we conducted dozens of land exchanges. It is always the case that exchanging public land out of public ownership will be controversial. Each parcel of public land has public value and there is a constituency who would prefer retaining ownership. It is also the case that BLM in Montana manages the most fractured public land base of any state and much of that public land is isolated and surrounded by private land. If we are to build a land base that provides improved public land base values it will be through an aggressive land exchange program.

I know that this issue has been a tough one and thanks for keeping the door open for a land exchange.

Best regards,

Mike Penfold, Billings, MT



Kania, Michael <mkania@blm.gov>

Bullwhacker

1 message

Clint Loomis <cloomis@midrivers.com>

Tue, Feb 17, 2015 at 9:46 AM

To: BLM_MT_Billings_FO@blm.gov, BLM_MT_Central_DO@blm.gov, BLM_MT_Lewistown_FO@blm.gov, "Kania, Michael" <mkania@blm.gov>

Mike Kania:

Let me state up front that I am not in favor of BLM building a new road into the Bullwhacker. I am in favor of BLM working with interested parties in acquiring the portion of road currently held by private land owners by means of a land exchange provided that the net gain for the private owners does not exceed the value of the Bullwhacker property.

Couldn't we try again to bring all the interested stakeholders together to see what can be agreed to? I suspect that there are scattered parcels of federal land in the Little Snowies which the Wilkes Brother hold of interest. Might these be used in the exchange? Would it not be mutually beneficial to both the landowner and the BLM if portions of land could be consolidated for management purposes?

I have to be honest about accessing federal land in the Little Snowies. The parcels on the map are surrounded by private holdings and don't add to any public wilderness experience. I have lived here forever and have yet to find a reason or means to get to those small blocks of land. On the other hand I have had amazing days accessing the Bullwhacker area via the Anchor Ranch road and am angered by the way it has been manipulated to exclude the American public from getting into some of the most marvelous wilderness in Montana. I don't know what implications a transfer might have on native plants and animals and that should be carefully assessed before any exchange is made.

I have attended public meetings in which accessing the Bullwhacker has been discussed and have seen the road options, heard the costs and the difficulty in constructing and maintaining a new road and for those reasons alone, as a tax paying citizen, I am not in favor of adding to BLM's already overly stretched responsibilities. I would rather the 'don't do anything option' coupled with closing off the side roads that merge with the existing 'main' road to punching in a new one.

Personally, I feel the BLM has the responsibility to honor the Monument's proclamation to the best of its ability, and resist outside pressure to allow access via building a new road. For the good of the land, the plants and animals, and the area's historical value, it's important to have an agency that is clear in its intentions to preserve and protect all aspects of this landscape.

If I had my way I would keep the existing road, and with the money saved from building a new road put in two vault toilets: one where the road currently enters the private land and one at the Gilmore, and finally build the Monument's second hiking/mountain bike/horse trail that leads to the river. That would be such a win/win feather in BLM's and the American public's hat, and it might begin to build a fondness for the Monument that would even lead to regional economic stimulus!

Clint

www.cloomisstudio.com



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Kania, Michael <mkania@blm.gov>

Fwd: Bullwhacker roads

1 message

Jamie Connell <jconnell@blm.gov>

Tue, Dec 9, 2014 at 9:58 AM

To: Gary Benes <gbenes@blm.gov>, Geoff Beyersdorf <gbeyersd@blm.gov>, Michael Kania <mkania@blm.gov>

FYI

Jamie

Sent from my iPad

Jamie Connell
State Director, BLM Montana-Dakotas

Office 406-896-5012
Cell 406-839-5754

Begin forwarded message:

From: Kent Gilge <gilge@ttc-cmc.net>
Date: December 9, 2014 at 6:58:11 AM MST
To: <jconnell@blm.gov>
Subject: Bullwhacker roads

I have followed the Bullwhacker road proposal scoping and I am of the opinion that neither road option is viable . The road is currently in the right place and negotiations with the Wilks should be restarted to find a solution agreeable to those north and south of the river.

Kent Gilge
4145 70th Ave W
Havre, MT 59501

—

From Kent Gilge " If you see people as losers you will treat them with contempt. If you see people as lost you will treat them with

12/15/2014

DEPARTMENT OF THE INTERIOR Mail - Fwd: Bullwhacker roads

compassion." unknown



Kania, Michael <mkania@blm.gov>

Bullwhacker

1 message

Clint Loomis <cloomis@midrivers.com>

Tue, Feb 17, 2015 at 9:46 AM

To: BLM_MT_Billings_FO@blm.gov, BLM_MT_Central_DO@blm.gov, BLM_MT_Lewistown_FO@blm.gov, "Kania, Michael" <mkania@blm.gov>

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Clint



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Mitch Forsyth
1530 12th Ave
Havre, MT 59501

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2014 DEC 29 PM 2:39

Bureau of Land Management
Mike Kania
Manager, Upper Missouri River Breaks National Monument
920 NE Main St
Lewistown, MT 59457

CENTRAL MONTANA
DISTRICT OFFICE
LEWISTOWN, MT

Dear Mr. Kania:

After attending the Bullwhacker Road public meeting in Chinook, I was left with the impression that there are no alternative road routes into the Bullwhacker area and BLM is not pursuing any other options to restore road access.

The BLM staff spent most of the meeting laying out reasons why neither the east or west route is a viable option. The reasons offered included initial construction costs, maintenance costs, loss of big game and greater sage-grouse habitat, impacts to scenic quality, engineering challenges (steep coulees, unstable soils) and funding. It seems unrealistic that BLM will be able to secure the funding necessary to construct and maintain a dirt road paralleling an existing road, where it has been determined the existing road is situated in the most practical location. Therefore, the "No Action" alternative is the likely choice which doesn't solve the issue of how to restore road access into the Bullwhacker area.

The three public scoping meetings should have been designed to allow the public an opportunity to provide comments on how to restore road access into the Bullwhacker area. That's the issue, not which road to construct. All actions need to be explored which may involve easements, land exchanges, changing the designation of existing roads and constructing new roads.

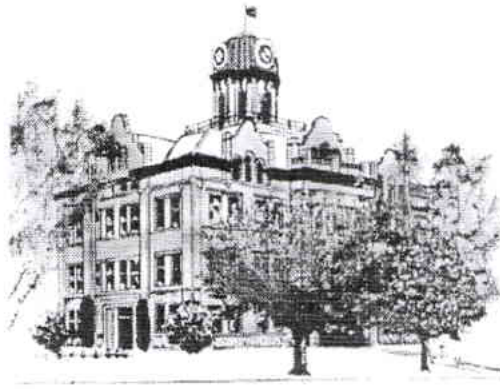
BLM stated in their November 18, 2014 news release that "A proposed land exchange to restore access was considered, but was determined to be not in the best interest of the American people who have entrusted the BLM to manage their public lands for them." The rationale, justification and decision making process BLM used to eliminate a potential land exchange was never presented at the Chinook meeting.

The benefits of restoring road access into the Bullwhacker area are many. The Bullwhacker Road provided year-round access allowing the public to participate in a variety of uses on public land - hunting, hiking, access to historic and prehistoric sites, scenic and wildlife viewing, access to other special management areas such as wilderness areas and access to historic cabins. I urge the BLM to reconsider and reopen negotiations with the landowner to acquire the existing Bullwhacker Road. The benefits of a land exchange far outweigh the negative impacts associated with constructing a road in a *National Monument*. You have a willing landowner where fee acquisition is an opportunity. Not only an opportunity to acquire the Bullwhacker Road, but also other private land in the area providing additional access to public lands.

Sincerely,



Mitch Forsyth



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BLM

2014 DEC 12 PM 1:18

CENTRAL MONTANA
DISTRICT OFFICE
LEWISTOWN, MT

FERGUS COUNTY

December 10, 2014

BLM
Upper Missouri River Breaks National Monument
Attn: Mike Kania, Monument Manager
920 NE Main St.
Lewistown, MT 59457

RE: BLM Rerouting Road

Dear Mr. Kanina,

The Fergus County Commissioners are in favor of the BLM rerouting the road into the Bullwacker area. We are not commenting on the route as we feel the BLM needs to make that decision on their available resources and best judgment of their preferred route.

We believe that all options should remain on the table until a final decision is reached, i.e. purchase, exchange.

Sincerely,

Ken Ronish
Commissioner

Sandy Youngbauer
Commissioner

Carl Seilstad
Commissioner

Fergus County Commissioners
712 W. Main St., Suite 210
Lewistown, MT 59457

commissioners@co.fergus.mt.us

Ken Ronish, District 1
Sandy Youngbauer, District 2
Carl Seilstad, District 3



March 5, 2015

Mr. Michael Kania
Monument Manager
Upper Missouri River Breaks National Monument
920 NE Main St.
Lewistown, MT 59457

Re: Bullwhacker Access

Dear Mr. Kania,

Thank you for providing this opportunity to comment on the access issue regarding the 50,000 acre Bullwhacker area of the Upper Missouri River Breaks National Monument.

The Montana Wilderness Association (MWA) is a statewide, non-profit organization with more than 5,000 members who enjoy hiking, hunting, fishing, horseback riding, photography, and exploring the solitude offered by public lands in Montana. Our mission is to work with communities to protect Montana's wilderness heritage, quiet beauty, and outdoor traditions now and for future generations. Many of our members live near BLM lands and as an organization, MWA has a long history with the Missouri Breaks starting with the original wilderness inventory process and creation of the Wild and Scenic Missouri, to the more recent creation of the Upper Missouri River Breaks National Monument and the Resource Management Planning process.

I write this letter with support of the board of the Island Range Chapter (IRC) of MWA. The IRC, about 550 members strong, includes north central Montana. The Monument is right in the middle of its geographic area.

MWA members attended the December 2014 meetings when the discussion largely focused on alternatives for building a new road around the Wilks Brothers property to provide vehicle access into the Bullwhacker. During the meetings it became apparent that all of the proposed routes are problematic. To mention just a few: (1) Private landowners will not provide access to the Bullwhacker through Cow Creek ACEC drainage. (2) The proposed routes and both the west and east side of the Robinson Ranch (Wilks Brothers) property present severe, if not overwhelming, physical challenges— both in the road building and long-term maintenance. (3) A new road will likely have impacts to wildlife, especially on the east side where it would encroach on prime sage grouse habitat.

CENTRAL MONTANA
DISTRICT OFFICE
LEWISTOWN, MT

2015 MAR -6 PM 1:16

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What is apparent from the public meetings is that there is a strong desire from the public, for a fuller range of alternatives. Most attractive of the alternatives would be to reopen, and hopefully more successfully negotiate, a land exchange for the Robinson ranch property. (1) Acquiring the Robinson property would expand access and recreational opportunities to in the monument. (2) A new road would not be needed, saving taxpayers and your budget many hundreds of thousands of dollars in the long term. (3) Impacts to wildlife could be avoided.

Other alternatives we can support include (1) construction of a foot or horseback trail bypass rather than a motor vehicle road and (2) no action, leaving access via the three airstrips or river.

Also of concern: Allowing motorized vehicles into areas that up to now have been inaccessible to vehicles will likely have impacts, especially to wildlife. To honor the Monument Proclamation vehicles must stay on "roads." However, most routes in the monument do not meet the current BLM definition of a road (Manual 6310)— *A route that was established or has been maintained solely by the passage of vehicles would not be considered a road for the purposes of wilderness inventory, even if it is used on a relatively regular and continuous basis. Vehicle routes constructed by mechanical means but that are no longer being maintained by mechanical methods are not wilderness inventory roads.* We ask the BLM continue to examine the option of closing roads to at least ensure that there will be no net gain in present miles accessible to motorized vehicles.

Thank you for providing this opportunity to comment on the DEIS and draft RMP for the HiLine District. We sincerely appreciate the opportunity to participate in this and other important decisions affecting public lands in Montana. We hope you find these comments to be helpful, informative, and useful in deciding how best to manage the area.

If you have any questions or comments, or wish to discuss the issues raised in this comment letter in greater detail, please do not hesitate to contact me.

Sincerely,



Ralph W. Knapp
Vice President, Island Range Chapter
3018 3rd Ave S
Great Falls MT 59405
406/866-0756
rwknapp@bresnan.net

DEPT. OF INTERIOR
BUR. OF LAND MANAGEMENT

2015 JAN 16 AM 10 31

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2015 JAN 20 PM 1:29

BLM state Office

Southgate Drive

Billings MT 59101

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MONTANA STATE OFFICE
BILLINGS MONTANA

Jan'14 2014

CENTRAL MONTANA
DISTRICT OFFICE
LEWISTOWN, MT

Attention Mike Kania

The Public Land and Water Access Association believes the best option for access into the vast public lands in the Bullwacker area involves building an alternate road on BLM land on the EAST of the existing road that was closed by court order on private land. After bypassing the private land the alternate route should then be connected to the original road on BLM land when it is reasonable to do so.

Once this road is available to the public, the original road should then be closed from the hookup point back to the boundary with private land.

To meet the concerns of those who are not happy with any new roads in the Monument, decommission one of several roads on BLM land that are not available to the public due to private land blocking access near their origin. We believe the Erwin Ridge Road is an example of this situation. We are sure there are numerous others.

If a grazing permittee claims he or she needs to travel such a road issue the a permit to use the road a limited number of times for the sole purpose of activities related to the grazing permit.

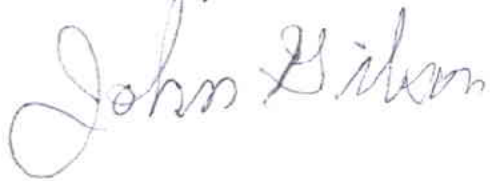
Our selection of an east side alternate road is based on the following observations.\

1. Your plans show that public access into this vast area of public land is important. The east side would appear to be the best and cheapest.
2. The vastness of the area (50,000acres) is simply too large to be walk in only.
3. The land exchange that includes the Durfee Hills is off the table. At least it should be. (although you might expect political pressure to revisit this proposal since the fencing debacle has taken place)

4. The decommissioning of a road that is essentially a private road on public land can be the start of a long range effort to correct your road policy.

Thank you for the opportunity to comment.

John Gibson, President

A handwritten signature in cursive script that reads "John Gibson". The signature is written in dark ink and is positioned below the typed name.

**BILL CUNNINGHAM
P.O. BOX 1404
CHOTEAU, MT 59422
(406) 466-5699**

RECEIVED
BLM

2014 DEC 16 PM 1:05

CENTRAL MONTANA
DISTRICT OFFICE
LEWISTOWN, MT

December 14, 2014

Mike Kania, Monument Manager
Bureau of Land Management
920 NE Main Street
Lewistown, MT 59457

RE: Comments on Bullwhacker Access

Dear Mike:

I attended the scoping session on December 14, 2014 in Lewistown concerning the proposed Bullwhacker access. For more than 40 years I've floated, hiked and hunted in the Missouri Breaks and am very familiar with the Monument in general and the Bullwhacker area in particular.

I'll state at the outset that I am adamantly opposed to the construction of a bypass road in Bullwhacker. I was heartened to hear Stan Benes state that BLM doesn't really want to build the road and that the agency recognizes that the impacts to the land and to wildlife values would be significant. The east side route would compromise sagebrush grouse habitat and leks at a time when the species faces listing under the ESA. The west side route poses unacceptable cut and fill impacts in extremely rugged terrain with numerous steep coulees. The bottom line is that new road construction in Bullwhacker would seriously detract from the objects of the Monument when BLM should be going in the opposite direction, and that to PROTECT the objects of the Monument.

There is no way that a new road can be justified if stewardship of the Monument is to be more than just rhetoric. While perhaps not an "object" of the Monument according to the court decision Bullwhacker nonetheless specifically mentioned in the Proclamation as some of the most primitive land in the Northern Great Plains. Five and one-half miles of new road in Bullwhacker would obviously violate the spirit if not the letter of the Proclamation and everything the UMRBNM stands for.

I would submit that the public already has sufficient access to this vast contiguous block of BLM public land from the river and from the upper reaches of the Cow Island Road. Additional motorized access on open roads is both unnecessary and inappropriate. Most of the pressure for open road motorized access almost down to the river is from hunters who mistakenly think that more roads mean better hunting. In reality they're their own worst enemy. If they can drive there everyone else can too and guess what. Elk, deer and bighorn sheep will be elsewhere, assuming there is an "elsewhere" for them to flee to.

Several people at the meeting suggested a bypass non-motorized trail rather than a road to get around the Wilkes Brothers inholding. This is an excellent idea. An expansion of this idea would be to construct a 11-mile long bypass **loop** trail for hikers and equestrians that could be used by hunters as well as hikers

during other seasons of the year. A trailhead/parking facility could be established near the west side turn from the Cow Island Road close to the northern edge of the private inholding.

Other suggestions include possible use of eminent domain and another hard look at possible land exchanges with the Wilkes Brothers. I've just heard recently that negotiations may be resuming with the Wilkes Brothers, which, in turn, may open up options other than the environmentally disastrous notion of new road construction.

With so many options and complications on the table BLM will soon discover that a quick and easy EA will not suffice and that a full NEPA EIS will be necessary. If the road option is dropped we can avoid the time and expense of an EIS not to mention the huge cost of the road which would probably eat up BLM's Monument budget for years to come.

Bullwhacker is essentially a vast, wild and mostly quiet place and if the Monument is to be properly managed it needs to stay that way. It is by far the deepest penetration of BLM land in the Monument which makes it all the more special. That means changing a lot of green roads to red, especially those that don't connect due to lack of public access through private land. The half-dozen open roads branching off from Bullwhacker Road would, and should, be closed if only the private inholder has motorized access. And since the inholder has sole motorized access on the main Bullwhacker Road it too should be closed so that he has no preferential treatment above any other member of the public. If Wilkes wants to hike or ride horseback down to the river more power to him. This bold policy has long been avoided by BLM but in this particular case the agency should take another hard look at it and seriously consider closing the Bullwhacker road at the south end of the Wilkes Brothers inholding. Fairness to the public demands nothing less.

Dave Mari suggested an on-the-ground field trip this spring and I would like to second the motion. We'll hope for a window of dry weather. If you do set this up I would like to participate if at all possible.

Thank you for this opportunity to offer comments on an issue that is very important to the future of the Monument.

Sincerely,


Bill Cunningham



DR. RICHARD B. MCMASTER

821 WEST MAIN
LEWISTOWN, MT 59457

(406) 538-2020 • 535-2020

(800) 278-8988

(406) 538-8988 (FAX)

RE: Bullwhacker - EA.

I support building a road to re-establish public access to the BLM land currently locked up. I am not in favor of a land swap for the land in the Durfee Hills.

Thank you
R. McMaster
Lewistown MT

MARCH 3 2015

DOUG KRINGS
PROJECT MANAGER

DEAR MR. KRINGS

I WAS AT THE MEETING IN GREAT
FALLS HELD AT THE LEWIS AND CLARK
INTERPRETIVE CENTER. AFTER LISTENING
TO THE PRESENTATION ON THE PROS
AND CONS BY THE BUM PERSONNEL
I GO ON RECORD IN SUPPORT OF
THE EASTSIDE OPTION TO REESTABLISH
ACCESS INTO THE BULLWACKER AREA.

SINCERELY YOURS

David J Van Tighem

DAVID J. VAN TIGHEM

1312 3 AVE NORTH

GREAT FALLS, MONTANA 59401

HOME PHONE 1-406-452-8249 CELL# 231-3969

HAVRE RIFLE AND PISTOL CLUB

P.O. Box 1777

Havre, Montana 59501

RECEIVED
BLM

2015 FEB 13 PM 1:14

CENTRAL MONTANA
DISTRICT OFFICE
LEWISTOWN, MT

DATE: February 8, 2015

Upper Missouri River Breaks National Monument

920 NE Main Street

Lewistown, MT 59457

RE: Scoping comments concerning Bullwhacker Road in South Blaine County

The Havre Rifle and Pistol Club is group of shooters and hunters in Havre, Chinook and along the HiLine of Montana. Our annual membership for the last several years has been 50 +. Our club operates a local shooting range on Montana Fish, Wildlife and Parks land northwest of Havre that accommodates approximately 800 local shooters. Our members help several times a year with the Montana hunter safety course and host live shooting exercises. A good deal of our membership and the people that use our shooting range are very familiar with the Bullwhacker area and have used the historic access through the private property, some as far back as WWII.

We appreciate that BLM is following through with a public process as part of resolving access in the Bullwhacker area. We were sorely disappointed with uncalled for comments at the Chinook scoping meeting of a few individuals that choose not to be respectful of others and their lands. The vast majority of us want to respect each other. This is not the time to demonize or endorse someone or group of people, idea or political agenda and force a specific action. It is the time to work out a resolution in a focused, factual and mutually respectful way.

We agree that the existing road through the private property is the most sensible, logical, economically and ecologically prudent, but we also recognize that with current circumstances it has become necessary to consider alternatives for access to public land and resources. Our current situation drives home an escalating conflict between Private and Public property rights. Also at issue is the holding of the public land and resources "hostage". *Private Property Rights are important and need to be respected, however the Public's Right to the Public's Property is no less important.* By contrast, if the roles were reversed and a road crossing public land was access to private land this dilemma would not exist, because the private interests would have at least reasonable if not complete open access across the public land to the private land.

It will be important to identify and analyze a full range of alternatives in terms of several criteria and not just a few that "feel right" judged on a few criteria and standards that may be too limiting. The standard mentioned at the Chinook meeting of having an "all season, all weather road suitable for a high clearance two wheel drive vehicle" does not have to be a standard for a road considering that no

existing roads in the area will meet this standard. Even the Cow Island Trail road from Bear Paw springs east across Bullwhacker and Cow Creek and connecting to Highway 66 near Hays (which anyone wanting to access the Bullwhacker area will have to travel) does not meet the above standard.

Of the alternatives presented at the Chinook meeting, we understand the implications of roads east and west of the private land and the route via the Spencer Cow Camp. We also believe that constructing a parallel access road (in addition to the existing road over private land) will depreciate the resource values of both the public and private land.

We do not agree that a No Action alternative will meet the purpose and need of establishing access for the public to the public lands and resources.

Even though the original proposed exchange for public land in the Durfee Hills is not viable in current circumstances, we do not agree that an alternative of still working with the private land owner to arrange an easement or acquisition should be "off the table".

Should an alternative to provide access to the public land through private lands be arranged by other parties we expect that BLM will be supportive and help facilitate such an alternative. We assert the BLM and all parties need to negotiate in good faith and stay focused on the purpose of establishing public access to the public lands.

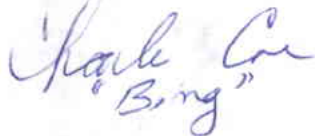
An alternative that would include acquiring the private land on the Bullwhacker ridge by the public or a conservation interest will be an excellent opportunity to recover greater-sage grouse habitat. Lands that have been farmed could be managed to re-establish a mix of forbs, grasses and sagebrush that would be a gain in sage grouse habitat as well as habitat for other wildlife.

We strongly urge BLM to not prematurely make a decision and then write a document to justify a pre-made decision. We believe that an Environmental Impact Statement (EIS) should not be necessary and that a well prepared Environmental Assessment (EA) with a full range of alternatives analyzed is all that will be needed. Paradoxically the cost of preparing an EIS is likely to be more expensive than the actual investment needed to resolve the situation.

Respectfully,

Charles "Bing" Coe

President, Havre Rifle and Pistol Club

A handwritten signature in blue ink that reads "Charles Coe" with "Bing" written below it in a smaller, cursive font.

L. I. (Lou) HAGENER

612 17th Street

Havre, MT 59501

406 265 5205

DATE: February 21, 2015

Upper Missouri River Breaks National Monument

920 NE Main Street

Lewistown, MT 59457

RE: Comments concerning Bullwhacker access

RECEIVED
BLM
2015 FEB 24 PM 1:06
CENTRAL MONTANA
DISTRICT OFFICE
LEWISTOWN, MT

My Name is Lou Hagener. I was born/raised and currently live in Havre. I am old enough to have a vague memory of the Robinsons buying the property on Bullwhacker. Growing up my parents took my brothers, friends and me hunting and exploring several times a year in Bullwhacker and the Missouri Breaks. My first ranch job was on the upper reaches of Cow Creek in 1972. In 1991, I took a job with the local BLM and had business dealings with John Robinson mostly concerning the grazing permit they held on Bullwhacker. In 1991, as an employee of the BLM, I had the discussion with John Robinson about this road and access situation. John affirmed that the public has been using the road through his property for a very long time and as long as he was around it would be open to the public, but he would not grant a right-of-way. John was respecting the public and asked very little of the public even though there were people occasionally not respecting his property. I was involved with development of the land use plan for the Upper Missouri River Breaks National Monument. I retired from the BLM after 30 years of public service in 2008. As a matter of full disclosure I am the brother of the Director of Montana Fish Wildlife and Parks. I cannot/do not represent the FWP or BLM. However, I can speak as an informed local citizen with experience and understanding of laws concerning lands

I appreciate that BLM is following through with a public process as part of resolving access in the Bullwhacker area. However, it appears that BLM is not following its own process by running a "Scopeing" period concurrently with rolling out and analyzing alternatives.

Obviously this matter is a sensitive issue and now is not a time to demonize or endorse someone or group of people, idea or political agenda and force a specific action quickly. It is the time to work out a resolution in a focused, factual and mutually respectful way.

I agree that the existing road through the private property is the most sensible, logical, economically and ecologically prudent, but also recognize that with current circumstances it has become necessary to consider alternatives for access to public land and resources. Our current situation drives home an escalating conflict between Private and Public property rights. Also at issue is the holding of the public land and resources "hostage". *Private Property Rights are important and need to be respected, however the Public's Right to the Public's Property is no less important.* By contrast, if the roles were

reversed and a road crossing public land was access to private land this dilemma would not exist, because the private interests would have at least reasonable if not complete open access across the public land to the private land.

It will be important to identify and analyze a full range of alternatives in terms of several criteria and not just a few that "feel right" judged on a few criteria and standards that may be too limiting. Personally I can come up with about a dozen alternatives. Though I would not endorse all of my own alternatives they would be worthy of analysis.

The No Action alternative will not meet the purpose and need of providing access for the public to the public lands and resources. Even though the original proposed exchange for public land in the Durfee Hills is not viable right now, an alternative of still working with the private land owner to arrange an easement or acquisition should absolutely be "on the table".

Should an alternative to provide access to the public land through private lands be arranged by other parties, I expect BLM to be supportive and help facilitate such an alternative. BLM and all parties need to negotiate in good faith and stay focused on the purpose of establishing public access to the public lands and resources for the long run future.

An alternative that would include acquiring the private land on the Bullwhacker ridge by the public or a conservation interest will be an excellent opportunity to recover greater-sage grouse habitat. Lands that have been farmed could be managed to re-establish a mix of forbs, grasses and sagebrush that would be a gain in sage grouse habitat as well as habitat for other wildlife.

I strongly urge BLM to not make a decision and then write a document to justify a pre-made decision. I believe that an Environmental Impact Statement (EIS) should not be necessary and that a well prepared Environmental Assessment (EA) with a full range of alternatives analyzed is all that will be needed. Ironically the cost of preparing an EIS is likely to be more expensive than the actual investment needed to arrange the needed access.

Respectfully,



L.I. (Lou) Hagener



1865 Hwy 2 East
Havre, MT 59501

March 3, 2015

Upper Missouri Breaks National Monument
920 NE Main Street
Lewistown, MT 59457

Re: Scoping comments concerning Bullwhacker Road in South Blaine County

The Bear Paw Bowmen Archery Club is a non-profit club of archers located mostly in Havre, Montana. Our Annual membership is approximately 15 active members, along with approximately 25 associate members. Our club is active in archery activities in North Central Montana and sponsor several archery events each year. Our members are regularly involved in the Montana Fish, Wildlife and Parks Bow hunter education courses. Several of our members have hunted in the Bullwhacker area for decades and are very familiar with the access situation there.

We appreciate that BLM is following through with a public process, as part of resolving access in the Bullwhacker area. We are sorely disappointed with uncalled for comments at the Chinook scoping meeting of a few individuals that chose not to be respectful of others and their lands. The vast majority of us want to respect each other. This is not the time to demonize or endorse someone or group people, ideas or political agenda and force a specific action. It is the time to work out a resolution in a focused, factual and mutually respectful way.

We agree that the existing road through the private property is the most sensible, logical, economically and ecologically prudent option, but we also recognize that with current circumstances it has become necessary to consider alternatives for access to public land and resources. Our current situation drives home an escalating conflict between Private and Public property rights. Also at issue is the holding of the Public land and resources "hostage". Private Property Rights are important and need to be respected, however the Public's Right to the Public's Property is no less important. By Contrast, if the roles were reversed and a road crossing Public Land was access to private land this dilemma would not exist, because the private interest would have at least reasonable, if not complete, open access across the Public Land to the private land.

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BLM

2015 MAR -4 PM 1:07

CENTRAL MONTANA
DISTRICT OFFICE
LEWISTOWN, MT

It will be important to identify and analyze a full range of alternatives in terms of several criteria and not just a few that “feel right” judged on a few criteria and standards that may be too limiting. The standard mentioned at the Chinook meeting of having an “all season, all weather road, suitable for a high clearance two wheel drive vehicle” does not have to be a standard for a road, considering that no existing road in the area will meet this standard. Even the Cow Island Trail road from Bear Paw Springs east across Bullwhacker and Cow Creek and connecting to Highway 66 near Hays (which anyone wanting to access the Bullwhacker area will have to travel) does not meet the above standard.

Of the alternatives presented at the Chinook meeting, we understand the implications of roads east and west of the private land and the route via the Spencer Cow Camp. We also believe that constructing a parallel access road (in addition to the existing road over private land) will depreciate the resource values of both the public and private lands.

We do not agree that a NO ACTION alternative will meet the purpose and need of establishing access for the public to the public lands and resources.

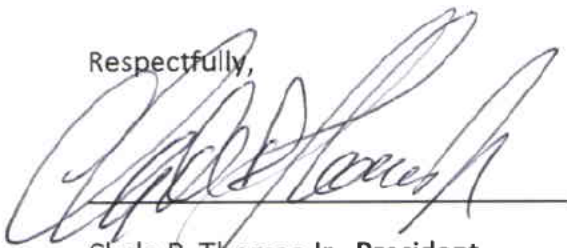
Even though the original proposed exchange for public land in the Dufee Hills is not viable in current circumstances, we do not agree that an alternative of still working with the private land owner to arrange an easement or acquisition should be “off the table”.

Should an alternative to provide access to the public lands through private lands be arranged by other parties we expect the BLM will be supportive and help facilitate such an alternative. We assert the BLM and all parties need to negotiate in good faith and stay focused on the purpose of establishing public access to the public lands.

An alternative that would include acquiring the private land on the Bullwhacker ridge by the public or a conservation interest will be an excellent opportunity to recover greater-sage Grouse habitat. Lands that have been farmed could be managed to re-establish a mix of forbs, grasses and sagebrush that would be a gain in sage grouse habitat, as well as habitat for other wildlife.

We strongly urge BLM to not prematurely make a decision and then write a document to justify a pre-made decision. We believe that an Environmental Assessment (EA) with a full range of alternatives analyzed is all that will be needed. Paradoxically, the cost of preparing an EIS is likely to be more expensive than the actual investment to resolve the situation.

Respectfully,

A handwritten signature in black ink, appearing to read "Clyde R. Thomas Jr.", written over a horizontal line.

Clyde R. Thomas Jr., President
Bear Paw Bowmen
Bearpawbowmen.com

Greg Durward
606 4th AV.
Haver Mt. 59501

I feel that the B.L.M. didn't go through the right steps in determining the different alternatives for the Bullwacker access. There are surely more alternatives than the three you came up with, and the one alternative of no action should not even been a option. I feel the B.L.M. got us into this mess and are hoping for a single way out of it. The B.L.M. should rethink this problem and come up with more alternatives that would give the public access to the Bullwacker watershed.

RECEIVED
BLM

2015 FEB 25 PM 1:28

CENTRAL MONTANA
DISTRICT OFFICE
LEWISTOWN, MT

Marcia Gans
P. O. Box 349
Lewistown, MT 59457

February 24, 2015

Bureau of Land Management
920 NE Main Street
Lewistown, MT 59457

ATTN: Bullwacker Scoping Comment

I disagree with building bypass roads around the private parcel of land in the Bullwacker.

I would like to see the private land returned to public ownership through a land swap. Then the existing basic road could be used by the public with minimal impact.

This would be best for the land and for users of this wild and scenic area.

I hope BLM will initiate and cooperate with discussions about a land swap.

Sincerely,



Marcia Gans



Written Comment Form

Bullwhacker Access

RECEIVED
BLM

2015 FEB 26 PM 1:04

Note: Your entire comment, including your address, phone number, e-mail address or other personal identifying information, may be made publicly available at any time. While you can ask us in your comment to withhold from public view your personal identifying information, we cannot guarantee we will be able to do so.

CENTRAL MONTANA
DISTRICT OFFICE
LEWISTOWN, MT

Name:	Sara Toubman
Organization:	NA
Mailing Address:	940 Wilder Ave
City/State/Zip:	Helena MT 59601
Email Address:	stoubman@gmail.com

Yes, include me on the mailing list to receive information. No, do not include my name and address on the mailing list.

All comments must be received or postmarked by March 5, 2015

Please mail or email your comments to:
Upper Missouri River Breaks National Monument
920 NE Main St. Lewistown, MT 59457

blm_mt_public_access@blm.gov

For more information, contact:
Mike Kania, Monument Manager
(406) 538-1950

Thank you for your comments

Comments Instructions

All substantive comments will be addressed. Useful comments are specific, mention particular pages where appropriate, and address one or more of the following: inaccuracies or discrepancies in information; identification of new information relevant to analysis; identification of new impacts, alternatives, or mitigation measures; specific suggestions for improving management direction.

Please consider a new alternative: to not build a NEW road into the Bullwhacker, but instead consider a land exchange.

Thank you,
Sara Toubman



Written Comment Form

Bullwhacker Access

Note: Your entire comment, including your address, phone number, e-mail address or other personal identifying information, may be made publicly available at any time. While you can ask us in your comment to withhold from public view your personal identifying information, we cannot guarantee we will be able to do so.

Name:	DAVE MARI
Organization:	
Mailing Address:	108 SNOWY MOUNTAIN DR.
City/State/Zip:	LEWISTOWN, MT 59457
Email Address:	dmari@earthlink.net

Yes, include me on the mailing list to receive information.

No, do not include my name and address on the mailing list.

All comments must be received or postmarked by March 5, 2015

Please mail or email your comments to:
Upper Missouri River Breaks National Monument
920 NE Main St., Lewistown, MT 59457

blm_mt_public_access@blm.gov

For more information, contact:
Mike Kania, Monument Manager
(406) 538-1950

Thank you for your comments

Comments Instructions

All substantive comments will be addressed. Useful comments are specific, mention particular pages where appropriate, and address one or more of the following: inaccuracies or discrepancies in information; identification of new information relevant to analysis; identification of new impacts, alternatives, or mitigation measures; specific suggestions for improving management direction.

SEE ATTACHED COMMENTS

RECEIVED
BLM

2014 DEC 18 PM 2:45

CENTRAL MONTANA
DISTRICT OFFICE
LEWISTOWN, MT

These are my personal opinions and do not reflect the position of any organizations to which I belong.

I am disappointed that the access issue in the Bullwhacker area has come down to BLM considering building a new road. While I would enjoy some vehicular access at least part way into the area, I do not feel that the type of road that would have to be constructed is consistent with the intent of the monument. As you know, the Proclamation describes the Bullwhacker area as "some of the wildest country on all the Great Plains".

When the Secretary of the Interior was considering monument designation for the BLM lands in the Breaks, he helicoptered over the entire area. However, he landed at only one place to experience firsthand the spectacular nature of the area from the ground - the Bullwhacker area. The choice of a landing spot was not by chance. He knew the Bullwhacker area was special. While on the ground, he articulated his vision for the area - that ranching, hunting, and other low-impact uses that do not alter the landscape should continue. The proposal to build the type of road you say is necessary to provide vehicular access to the area is not consistent with that vision in my opinion. I hope BLM shares that vision.

I previously objected to the BLM's approval of the backcountry airstrips in the Bullwhacker. I am of the opinion that they are inconsistent with the vision of the monument. I also felt the airstrips catered to the wealthy and provided them an unfair advantage when it came to hunting/recreation. While I still feel that way, the airstrips have been litigated and judged consistent with the Proclamation. Given that, I believe use of the airstrips is an appropriate access alternative to building a new road. The people who initiated the petition against a BLM exchange with the Wilks brothers, and who pressured BLM to abandon the proposal, told me that flying into the Durfee Hills to hunt was "really not expensive". That certainly came as a surprise to me, given my perception of the expense of owning an airplane or paying for a private charter flight. They are some of the same people who now are advocating that you provide motor vehicle access into the Bullwhacker so they can hunt. Given the understanding that flying is "really not expensive", I believe they can fly-in to the backcountry airstrips for access (or they can walk in like others will do).

In priority order, here is the course of action I would recommend:

- A. I think you should pursue once again the notion of an exchange. I don't feel comfortable yet that you have exhausted all options in determining that an exchange is not in the public interest. Keep the lines of communication open with the Wilks brothers. In fact, a key person behind the petition opposing the exchange attended your Lewistown scoping meeting and sounded to me like he was still open to looking at alternatives that might allow some sort of exchange to go forward. The District Manager pointed out the lengthy process of completing a land exchange. The same could be said of doing an EIS on a new road and getting money appropriated to build and maintain it.

If you can complete an exchange, I think you should consider closing all the roads that head east off the existing Bullwhacker road that are designated open in the monument RMP if you can get private land owner permission. These roads will be more accessible than they are now, and they lead into general sage grouse habitat. I would think you would want to minimize that.

- B. If some sort of exchange cannot be negotiated, the next best option in my opinion is a trail system instead of a road into the Bullwhacker. This should be an alternative that you analyze in your environmental document.
- C. And if that isn't feasible and you insist on building a road, then I would like you to consider several mitigating measures:

1. Close the Bullwhacker road yearlong at the wild and scenic river boundary. This road is now open seasonally. This road is extremely steep, meets absolutely no BLM standard for a road, and is nothing but a "hill climb" for off-roaders that causes erosion. For the same reasons, the road to Gist Bottom from Ervin Ridge that is seasonally open to motorized use should also be closed where it gets steep.
2. There should be no net gain in miles of road (the road you are considering building is about 5 miles long). Actually you should close more than 5 miles of roads, because the type of road you are proposing to build will allow more vehicles and different types of vehicles than probably use the existing private road.
3. For years, the BLM has postponed decommissioning roads that are supposed to be closed according to the monument RMP. If you can find the money and time to start building a new road, you should be able to find the time and money to implement the road closures. These closures are no less "urgent" than building a new road. You could start with roads in the WSA's as well as in the Bullwhacker area.

The question of maintenance cost of the proposed roads was asked but never answered at the scoping meeting. I can appreciate that you may not yet be able to put a figure on maintenance costs, but it needs to be addressed in your analysis. Roads in this area are unstable and move. The "new" road going down to Judith Landing was built because the "old" road going down through the PN Ranch kept slumping. A retired BLM soil scientist provided professional guidance on the location of the new road, yet a huge part of the hillside still slumped. The road in the Arrow Creek Breaks between Coffee Creek and Square Butte has required an unprecedented amount of money by the state to try to keep it from moving. Maintenance of the road going down to the Stafford Ferry on the north side of the river prompted Blaine County to explore relocating the road. BLM looked into this with the county and concluded that their proposed location would present the same slumping issue.

RECEIVED
BLM

Dyrck Van Hying
6835 43 St. S.W.
Great Falls, MT 59404
406-453-6039

dvanhying1@msn.com

December 8, 2014

2014 DEC 10 PM 1:12

CENTRAL MONTANA
DISTRICT OFFICE
LEWISTOWN, MT

Mike Kania
Monument Manager
Upper Missouri River Breaks National Monument
BLM District Office
920 NE Main St.,
Lewistown, MT 59457
[<mkania@blm.gov>](mailto:mkania@blm.gov)

SUBJ: Bullwhacker Road Scoping

Dear Mike:

Thank you for allowing me to comment on the Bullwhacker Road Scoping proposed action. I attended the Great Falls public meeting on December 2, 2014 and appreciated the power point presentation. Not only the maps (which I took a copy of your handouts) but the pictures of both east and west side terrain. It seemed Jonathan Moor running the digital projector had a difficult time keeping on track with the presenter.

I understand there were three alternatives presented plus two additional alternatives that were considered but dropped for various reasons.

Alternative 1: No action alternative (no new road)
Alternative 2: West Bullwhacker access route
Alternative 3: East Bullwhacker access route.

After listening to Stan Benes, Mike Kania, Chad Krause presentations, I believe there is only one Alternative, and that is #1, build no new road either on the east or west side of the Wilks Ranch property in the Bullwhacker Road area.

I have moved cattle with Bill Robinson, Anchor Ranch owner in past years over much of the area described in the presentation. Chad Krause described the soil type, how it was deposited and the salt content from the inland sea clay over thousands of years, causing constant dispersal of the soil down hill. This explained why I believe is why a new road would be very difficult to maintain after construction. There is a reason why the existing road is where it is for the last 150 years, because it is at the top of the ridge with no coulee along the route.

The picture presentation by BLM showed both on the east and west side of Wilks property, many coulees that lay in the path of the proposed alternative. Chad even pointed out trees where the soil they grow in had shifted during their life cycle. The tree base several feet in height at an angle, and then the upper portion again growing straight up, showed this soil shift. There was a comment from the audience about Arrow Creek Hill where Montana 80 is being reconstructed. The commenter said the bid for the road was \$13.5M and is now many million over budget. The soil in the Monument is the same type gumbo as Arrow Creek Hill. His question, what has the BLM allowed for maintenance if a road was built?

Some other questions addressed during the presentation was the Monument Proclamation of January 17, 2001.

The Bullwacker area of the monument contains some of the wildest country on all the Great Plains, as well as important wildlife habitat. During the stress-inducing winter months, mule deer and elk move up to the area from the river, and antelope and sage grouse move down to the area from the benchlands. The heads of the coulees and breaks also contain archeological and historical sites, from teepee rings and remnants of historic trails to abandoned homesteads and lookout sites used by Meriwether Lewis.

I understand from the BLM Bullwhacker Road presentation 12/2/2014, that the current Bullwhacker Road on Wilks Ranch Property will remain and Alternative 2 or Alternative 3 would be an additional road through the Bullwhacker. This seems to be contrary to the Proclamation, "*The Bullwacker area of the monument contains some of the wildest country on all the Great Plains*"

Also a new additional road would disturb "*contain archeological and historical sites, from teepee rings*"

The Press Release Date: 09/26/14, BLM starts process to restore Bullwhacker access with by-pass states: *The Historic public access to approximately 50,000 backcountry acres in the Bullwacker area within Blaine County had been lost following a 2011 court decision declaring a portion of the Bullwhacker Road crossing private lands to be a private road. A proposed land exchange to restore access was considered, but was determined to be not in the best interest of the American people who have entrusted the BLM to manage their public lands for them.*

The Historic Public Access to 50,000 backcountry is still available to anyone wishing to hike into the area. According to the UMRBNM Final EIS travel plan and Upper Missouri River Breaks National Monument Approved Resource Management Plan Map 4- Side B East Half Transportation Map handed out at the 12/2/2014 meeting, vehicle access is still available.

In fact, I used this access to Right Coulee and Bullwhacker Coulee area in late Oct 2014. The Square Butte Grazing District (the owner of private property) along the Spencer Cow Camp Road

has a sign in box for Montana Fish Wildlife and Parks “Block Management Program”. During Hunting season (Picture). Along the route MWP sign, “Hunting with Written Permission” with hand written “sign in box at top of hill”. This route is accessible only by ATV because of several washed out coulees. These washed out coulee crossings would require maintenance after heavy rain, if either Alternative 2 or 3 were constructed.



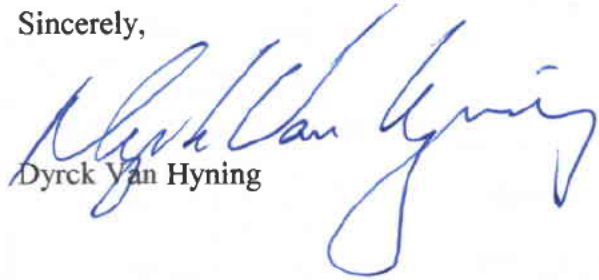
Square Butte Grazing District - MFWP Block Management sign in box on Spencer Cow Camp Road



Square Butte Grazing District Property on Cow Creek “Hunting with Written Permission” Sign

There are really no good solutions at this time to restoring full access to the Bullwhacker area of the Upper Missouri River Breaks National Monument.

Sincerely,

A handwritten signature in blue ink, appearing to read "Dyrck Van Hyning". The signature is fluid and cursive, with a large loop at the end of the last name.

Dyrck Van Hyning

Upper Missouri River Breaks National Monument

Bullwhacker Access Comment Form

Comments can be sent to:

Upper Missouri River Breaks National Monument

920 NE Main Street Lewistown, MT 59457

blm_mt_public_access@blm.gov

(406) 538-1900

CENTRAL MONTANA
OFFICE
LEWISTOWN, MT

Your Name: Les Carpenter

Date: Jan. 9, 2015

Address: PO Box 297
Plains, MT 59859

Phone: 406 826-2888

Email: les47jo55@yahoo.com

Comments Instructions

All substantive comments will be addressed. Useful comments are specific, mention particular pages where appropriate, and address one or more of the following:

- inaccuracies or discrepancies in information
- identification of new information relevant to analysis
- identification of new impacts, alternatives, or mitigation measures
- specific suggestions for improving management direction

Comments:

I am in favor of building a by-pass road around the Wilks Anchor Ranch property. I would prefer the East Side Route. I visited the lower end of Bullwhacker Coulee by canoe in October and would like to be able to access this area by vehicle as well. During my lifetime access to public land has continued to shrink due to private landowners closing access roads. Here is a chance to reverse this trend. Obviously vehicle access to Bullwhacker Coulee has existed since the homesteaders arrived to build their ranch buildings there. Lets keep it open.

Thank you.

Les Carpenter



Written Comment Form

Bullwhacker Access

Note: Your entire comment, including your address, phone number, e-mail address or other personal identifying information, may be made publicly available at any time. While you can ask us in your comment to withhold from public view your personal identifying information, we cannot guarantee we will be able to do so.

Name:	JIM GREENE
Organization:	
Mailing Address:	305 CUTLER ST
City/State/Zip:	HELENA, MT 59601
Email Address:	vogtgreene@gmail.com

Yes, include me on the mailing list to receive information.

No, do not include my name and address on the mailing list.

All comments must be received or postmarked by March 5, 2015

Please mail or email your comments to:
Upper Missouri River Breaks National Monument
920 NE Main St., Lewistown, MT 59457

blm_mt_public_access@blm.gov

For more information, contact:
Mike Kania, Monument Manager
(406) 538-1950

Thank you for your comments

Comments Instructions

All substantive comments will be addressed. Useful comments are specific, mention particular pages where appropriate, and address one or more of the following: inaccuracies or discrepancies in information; identification of new information relevant to analysis; identification of new impacts, alternatives, or mitigation measures; specific suggestions for improving management direction.

I understand the Wilks brothers are still willing to discuss a "land swap." I also understand that many of the attendees at the BLM's recent scoping meetings expressed a strong interest in pursuing a land swap. With this in mind I would request that the BLM go "back to the table" and work with the Wilks brothers to achieve a land swap agreement that is satisfactory to all.

If no land swap is achieved, I suggest the BLM create a non-motorized trail into "the Bullwhacker" suitable for hikers and horses, but unsuitable for ATVs. The Monument Proclamation calls for public hiking trails, but as yet there are no officially designated trails in the Monument.

In order to truly preserve the "objects" of the Upper Missouri River Breaks National Monument, even having no public access is worthy of consideration.

A five mile long, 50' wide road into the Bullwhacker is unacceptable. It would be an insult to the Monument, the Bullwhacker, and the BLM.

Thank you for your consideration, and your efforts.

13 January 2015

Mike Kania, Monument Manager
Upper Missouri River Breaks National Monument
Bureau of Land Management
920 NE Main St
Lewistown MT 59457

RECEIVED
BLM

2015 JAN 14 PM 1:01

CENTRAL MONTANA
DISTRICT OFFICE
LEWISTOWN, MT

Public Access Needed on Historic Bullwhacker Road in Upper Missouri River Breaks National Monument

Mr. Kania-

I write in strong support for the construction of a new public access road around the Wilks brother's property in Blaine County to regain the historic public access to the approximately 50,000 acres of public land in the Bullwhacker watershed that has illegally been taken from the citizens of the United States of America.

The loss of public access is a travesty that the US Department of Interior – Bureau of Land Management (BLM) never should have allowed to happen. This area has been open to the public via the Bullwhacker Road since the homestead days. Starting in the mid-1980s up until the illegal closure by the Wilks brothers, I used the road myself dozens and dozens of times to access those public lands in the Bullwhacker watershed all the way down to the Missouri River.

Additionally, BLM's management plan for the Upper Missouri River Breaks National Monument specifically endorses year-round access to this area. Just because the Wilks brothers illegally closed the public road through their property does NOT relieve the BLM of their legal obligation to provide public access to the Bullwhacker watershed.

Therefore, the BLM must take action to regain public access to this area. For that reason, I oppose the 'no action' alternative in the BLM's Environmental Analysis (EA) and support the proposed east side route over the west side route. Based on my visits to the area over the years, I believe the east side offers the less expensive option for obtaining the critical public road access to the Bullwhacker area, and the east side route will offer improved access to the public lands adjacent to the Cow Creek drainage. If the BLM decides not to construct a new public access route, then the BLM must pursue a legal challenge to regain the public access to the Bullwhacker area lost from the illegal closure of a historic prescriptive public access route.

Sincerely,



Robert Jeffrey
2111 9th Ave.
Helena, MT 59601

RECEIVED
BLM

January 10, 2015

2015 JAN 14 PM 1:01

Bureau of Land Management
920 NE Main
Lewistown MT 59457

CENTRAL MONTANA
DISTRICT OFFICE
LEWISTOWN, MT

**RE: Bullwhacker Road Comments;
Upper Missouri River Breaks National Monument**

I am in support of constructing a new, by-pass road around the Wilks Anchor Ranch property to gain public road access into the Bullwhacker watershed. I prefer the proposed east side route to the west side route.

I oppose the no action alternative. Public road access to the Bullwhacker area is critical to obtain.

I also encourage the BLM to pursue a legal challenge if the public lost access to the Bullwhacker area through the illegal closure of a historic prescriptive public access route.

I have recreated in the Bullwhacker area and encourage the BLM to manage the area responsibly for public recreational and natural resource benefits.

Sincerely,



**Carol Fox
2111 9th Ave.
Helena, MT 59601**

This letter of comments is in regards to the current NEPA scoping for the Bullwhacker public road access.

- 1) I feel the BLM did a poor job of engaging in the original process that resulted in the privatization of the previous public Bullwhacker road access. Therefore, they need to make good with the public and get a new route constructed ASAP.
- 2) The east route as presented at the scoping meetings is the best alternative. Build the east access route.
- 3) The current condition of the east route is being highly misrepresented from the BLM staff. Currently, oil and gas companies travel this route to check pipelines. If it is good enough for them it is plenty good for hunters and other outdoor recreationist. Why not just administratively declare the east road/route as "open" in its current condition?
- 4) Cost is not an issue. Improve the existing east route only in areas that are a safety concern for the public. We do not need a road better than other typical two track trails in the Breaks. You guys are engineering and designing a road standard that is WAY above what is needed. This in my opinion is to steer the public into a direction you want them to go. Shame!
- 5) Funding for a road is not an issue. RMEF and several others will help pay for the road. You know that! Quit trying to manipulate your agenda! Let the public decide.
- 6) What does the current travel management plan say for this area? I think you have already decided you would have a motorized access into the Bullwhacker? So why are we even discussing this?
- 7) Lastly, the whole discussion on a land exchange needs to stop! The public already spoke LOUD AND CLEAR on how they felt about this. NO LAND EXCHANGES.

Eric Peters

RECEIVED
BLM

2015 FEB 27 PM 1:13

CENTRAL MONTANA
DISTRICT OFFICE
LEWISTOWN, MT

RECEIVED
BLM

Written Comment Form 2015 JAN 13 PM 1:39



Bullwhacker Access

Notes: Your entire comment, including your address, phone number, e-mail address or other personal identifying information, may be made publicly available at any time. While you can ask us in your comment to withhold from public view your personal identifying information, we cannot guarantee we will be able to do so.

Name: DARLENZ FOOZ
 Organization: _____
 Mailing Address: 2075 CANYON FRARY ROAD
 City/State/Zip: HELENA, MT 59102
 Email Address: haukedge@gmail.com

Yes, include me on the mailing list to receive information. No, do not include my name and address on the mailing list.

All comments must be received or postmarked by March 5, 2015

Please mail or email your comments to:
Upper Missouri River Breaks National Monument
920 NE Main St., Lewistown, MT 59457

blm_mt_public_access@blm.gov

For more information, contact:
Mike Kania, Monument Manager
(406) 538-1950

Thank you for your comments

Comments Instructions

All substantive comments will be addressed. Useful comments are specific, mention particular pages where appropriate, and address one or more of the following: inaccuracies or discrepancies in information; identification of new information relevant to analysis; identification of new impacts, alternatives, or mitigation measures; specific suggestions for improving management direction.

I TOTALLY SUPPORT BUILDING A NEW ROAD AROUND WILKES.

[Signature]

Form is not required

If you have questions for PLWA, contact us at membership@plwa.org .
 Contributions can be mailed to PLWA, P O Box 80987, Billings, MT 59108 or
 on line at www.plwa.org .

JOIN THE CAUSE - OR MAKE A CONTRIBUTION

To: BLM Central Office

Maitha Vogt

305 Cutler St

Helena, MT 59601

Re: Bullwhacker Road

Please do not build a new road on the pristine prairie of the Bullwhacker Bench. Please consider a land swap for the Rancher Ranch so place all this landscape on public lands. If a land swap is not possible, please consider a trail access, instead of a 50 ft, 5.5 mile road, cutting up the prairie.

Thank you!

Maitha Vogt

CENTRAL MONTANA
DISTRICT OFFICE
LEWISTOWN, MT

2015 FEB 17 PM 1:40

RECEIVED
BLM

RECEIVED
BLM

2015 FEB 17 PM 1:40

2/12/2015

CENTRAL MONTANA
DISTRICT OFFICE
LEWISTOWN, MT

Mike Kanis
BLM
Lewistown, MT

Dear Mike:

Please do not put a road
to the Missouri River Breaks
Monument.

Please try for a land swap.

Theresa Sather
714-2nd St
Helena, MT 59601

AREA MANAGER FOR THE MONUMENT
Mike KANIA
CENTRAL MONTANA DISTRICT
BUREAU OF LAND MANAGEMENT

DEAR Mike,

I oppose the improvement
OF THE BULLWHACKER ROAD
INTO THE WILD HEART
OF THE MONUMENT, THAT
IMPROVEMENT IS ENTIRELY
CONTRARY TO THE DIRECTIVES
UNDER WHICH THE
MONUMENT WAS CREATED.
THE IMPROVEMENT FUNDS
WOULD BE MUCH BETTER
SPENT ON CONTROL OF
CATTLE GRAZING TO
MAINTAIN RIPARIAN
VEGETATION.

Sincerely,

Mark Melby
MARK Melby
920 STATE
HELENA, MT
59601

RECEIVED
BLM

2015 FEB 17 PM 1:40

CENTRAL MONTANA
DISTRICT OFFICE
LEWISTOWN, MT

RECEIVED
BLM

2-12-15

2015 FEB 17 PM 1:40

CENTRAL MONTANA
DISTRICT OFFICE
LEWISTOWN, MT

Mike Kanis
BLM
Lewistown MT

Please do not build a road to
Mississippi River Breaks
Monument.

Please try for a land swap

Sheila Foley
2540 Fernvale Lane
Helena MT 59601

RECEIVED
BLM

2015 FEB 17 PM 1:41

Bureau of Land Mgmt
Mike Smith Monument Manager
920 NE Main St
Lewistown, MT 59457

CENTRAL MONTANA
DISTRICT OFFICE
LEWISTOWN, MT

I am a Lewistown native. My first trip to the breaks was the dedication of the Fred Robinson Bridge. I have recreated a number of times on the river from Fort Barber to Fort Peck. It is rugged beautiful country that can be difficult.

Building a new road through the Bullwacker area makes no sense, it is expensive and problematic. A better alternative is negotiating a long term easement with the existing owner of the current road or maybe a land swap where the BLM can take ownership.

I trust that you will proceed with the best interests of the land and its resources and the interests of active Montanans and the ~~most~~ visitors to our state.

Sincerely

John McEwen
556 Sparta St
Helena, MT 59601

February 12, 2015

RECEIVED
BLM

2015 FEB 18 PM 1:09

Mike Kanig
Monument Manager
Upper Missouri Breaks
Lewistown, MT

CENTRAL MONTANA
DISTRICT OFFICE
LEWISTOWN, MT

Dear Mr. Kanig,

I am concerned about the BLM proposal to construct a road through the Bullwacker parcel.

Ideally public access could be gained by use of the existing private road, though an arrangement with the landowner.

If this is not possible, then I would prefer to see a trail (foot/horse) rather than a full-scale road with all the culverts/grading/disruption associated.

Thank you for your consideration.
Sincerely,

Margaret Regan

Margaret Regan
318 Chaucer St.
Helena, MT 59601

mregan@mt.net
406 431 3939

RECEIVED
BLM

Mr. Mike Kania
Bureau of Land Management
920 NE Main, Lewiston, MT 59457

2015 FEB 18 PM 1:09

CENTRAL MONTANA
DISTRICT OFFICE
LEWISTOWN, MT

Dear Mr. Kania,

I am very concerned about the BLM's intentions re: the Bullwacker parcel. Building a 50-ft wide "bypass road" appears to go against your organization's mission of protecting our public lands.

A large wide road would threaten the habitat of wildlife (such as elk, antelope, sage grouse and other wildlife). It would also disturb the natural beauty of the area, about which I care a great deal. Additionally, it would be a distraction to the many historical and archeological sites.

I urge you to either 1) consider a land swap to make the private Bullwacker parcel public; 2) Take no action on building a bypass route; 3) Build a foot trail or horse trail.

Thank you for listening to my concerns.

Sincerely,
Mary El Johnson

Director of The Kansas (Monument Manager)
Central Montana District
BLM

RECEIVED
BLM RECEIVED
BLM

2019 FEB 18 PM 1:09

CENTRAL MONTANA
DISTRICT OFFICE
LEWISTOWN DISTRICT OFFICE
LEWISTOWN, MT

Dear Mr. Kania,
Though I have some reservations concerning
a land swap of the Bullwacker public parcel
I am convinced that it not be parled for
some other parcel that may have greater scenic,
wildlife, habitat or other natural values.
In particular I'm referring to the Dwyer Hills
on the N-Bar Ranch.

I can support either option #2 or #3
which would still allow public access
via air strips on the Bullwacker parcel
or by trails from the Missouri River.
I do like the concept of having access by
horse or bicycle as well.

What I object to is the proposal of
building 50' wide roads on either side
of the the Wilks-Bullwacker property.
As I understand it either of the proposed
routes would necessarily drop into numerous
creeks and likely be hard to maintain.
Additional a 50' blade swan (for roadway)
would destroy too much native prairie.

Thank you for considering my comments

Jim Brangraver
312 Pine
Helena, MT 59601

Feb 12, 2015

RECEIVED
BLM

James Mullins
928 Wankeshw Ave
Helena MT 59601

2015 FEB 18 PM 1:09

CENTRAL MONTANA
DISTRICT OFFICE
LEWISTOWN, MT

Mike Kania
Monument Manager
Bureau of Land Management
920 N E Main St
Lewistown MT 59457

Dear Mr Kania,

I for one appreciate all the great work BLM does with our public lands of Montana. Generally speaking BLM seems spot on, protecting our Public Lands.

But I am opposed to building a new road to access the Bullwhacker. It is certain that this proposed road will be detrimental to wildlife habitat.

I support public access but I believe it should be consistent with the goals of Monument designation: foot trail, river or horse trail but protects this beautiful area.

Thank you for the opportunity to comment.

Sincerely,
James Mullins

Mike Kania:

RECEIVED
BLM

I am writing in regards to the Bullwhacker road issue. I am concerned about the proposal and subsequent willingness of the BLM to build a new road through the existing monument. This seems like an irrational decision on multiple levels.

- 1) Money spent on a project that is in contrast to the desires & guidelines outlined in the Monument Proclamation
- 2) Project that deviates from the policy outlined on national monuments
- 3) Disturbing the land, habitat, and serenity of a truly unique place
- 4) Letting powerful, wealthy, non-native humans ~~put~~ ~~again~~ dictate federal government agency ~~making~~ decision making

As a Lewistown native, I would like to see you make a decision with the future in mind. Conserving land, habitat, and wild places for future generations to enjoy. Not just drive in to...

Thanks for your time & attention,

Dan Oldenburg

February 13, 2015

RECEIVED
BLM

Lynn Finch
928 Waukesha
Helena MT 59601

2015 FEB 18 PM 1:09

CENTRAL MONTANA
DISTRICT OFFICE
LEWISTOWN, MT

Mike Kania
Monument Manager
Bureau of Land Management
920 NE Main
Lewistown MT 59457

Re: Bullwhacker Comment

Dear Mr. Kania:

In the interest of protecting the Upper Missouri River Breaks National Monument, I would like to express my opposition to the building of the proposed bypass routes to access the Bullwhacker area. I think that a new road would be detrimental to wildlife habitat; it would not meet the interest or goals of the Monument designation.

I'm very interested in public access to this beautiful part of Montana but I would encourage you to look at alternatives to the construction of a ~~new~~ new road.

Sincerely yours,
Lynn Finch

RECEIVED
BLM

January 11, 2015

2015 JAN 15 PM 1:13

To Whom It May Concern:

CENTRAL MONTANA
DISTRICT OFFICE
BOZEMAN, MT

This letter is to voice my support for building a new access road into the Bullwacker area, around the Wilks property. I think the east-side route is the best, but the west side route will do – the important thing is to maintain public access to public land. The Missouri Breaks area is a national treasure, designated and protected so that people may experience and enjoy it as such. Please build a new road and leave something for all Americans to enjoy, not just a wealthy few.

Sincerely,



Mike England
Bozeman, MT
mengland21@gmail.com

RECEIVED
BLM

Hello Mike,

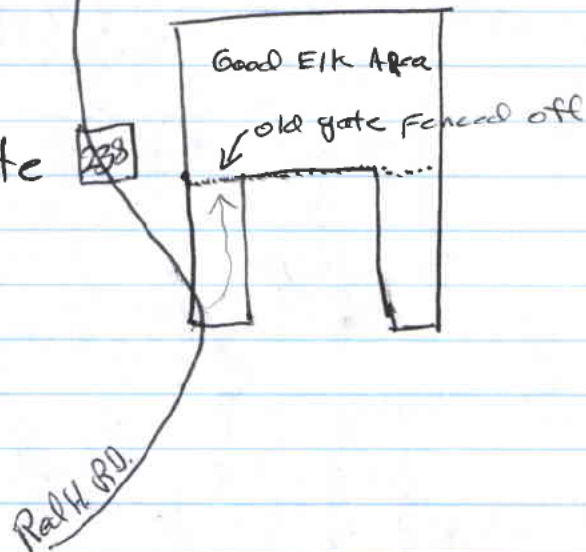
2015 FEB 19 PM 12:28

Feb 15, 2015

CENTRAL MONTANA
DISTRICT OFFICE
LEWISTOWN, MT

I called you last Jan, we talked about
the Wilkes bros land swap and I am sending
a small printout of what my question is.

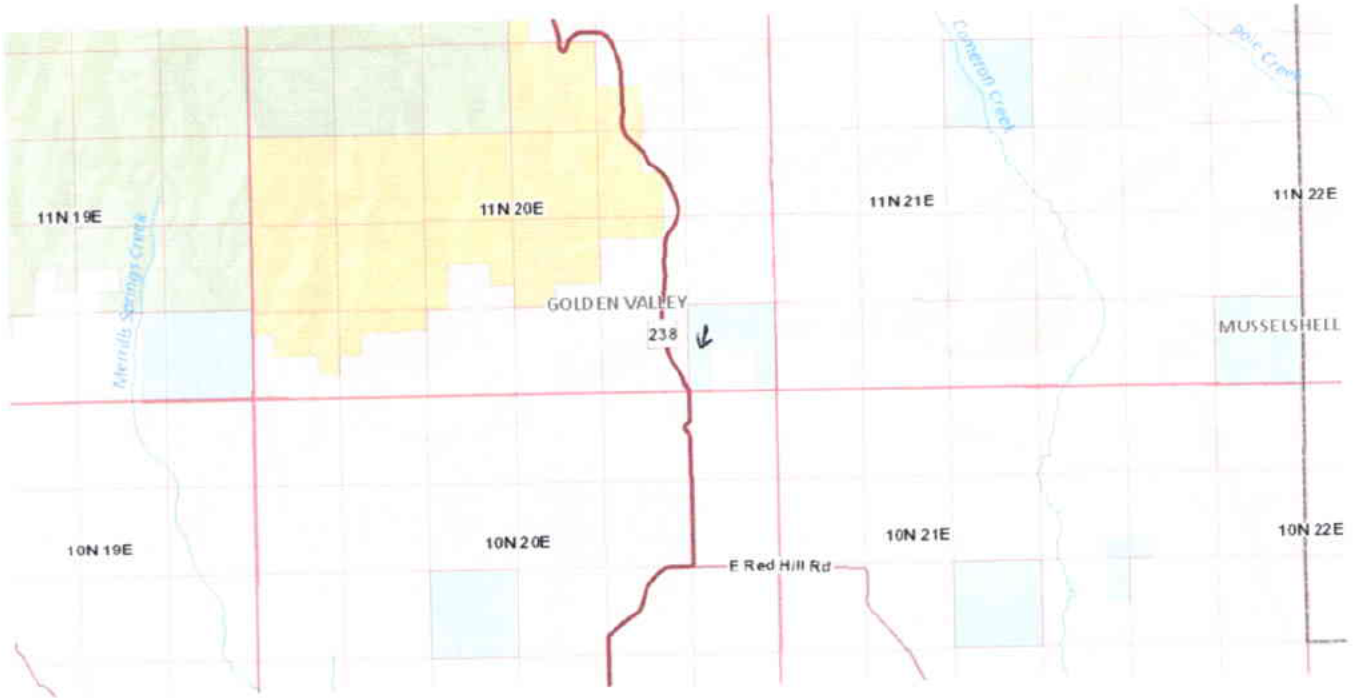
In the middle of this map, the state land
right by the Road Number 238, which is
Red Hill Rd., I can access the state land
off of Red Hill Rd but can go only part
way in, where my arrow is, is an old gate
fenced off, if only I
could cross the old gate
up into more St. Land
To hunt elk & Deer.
I know other people





Who know about this closed off part of St. Land,
we encourage you to open this old gate in part
of the Land trade. Thank you

PS. Dot your I's AND
CROSS your T's in this Deal...

Sincerely,
Jim Munroe



 Mr & Mrs Tim & Paula Mumion
PO Box 72
Shawmut MT 59078-0072 

(406) 632-4608

Please let me know if I can
be of any help.

RECEIVED
BLM

January 24, 2015

2015 JAN 23 PM 1:07

Mr. Mike Kania, BLM Manager
Missouri River Breaks National Monument
920 Northeast Main Street
Lewistown, Montana 59457

CENTRAL MONTANA
DISTRICT OFFICE
LEWISTOWN, MT

Re: Land Exchange

Dear Mr. Kania:

I'm writing you about the land exchange article in Saturday's Billings Gazette dated January 17, 2015. I have no specific agenda and have no party affiliation, but I'm opposed to land exchanges as a general rule.

I'm a retired and former Regional Review Appraiser for the Great Plains Region of USBR. I also served as the Regional Reviewer Appraiser for the Office of the Special Trustee for the American Indians.

I have had some experience in dealing with federal land exchange under applicable CFR's. For the most part these exchanges are a bad idea. In my experience, exchange proposals are nearly always initiated by a private party wanting to exchange some marginal piece of property for some prime reservoir land with the United States. The Fed usually bears all the behind screen investigations, appraisals, review and legal work at the public's expense.

From an appraisal standpoint, the Market Value of the properties to be exchanged must be of equal value, likely requiring adjustment of acreage based on different unit values of properties involved. In order for the exchange to move forward, the parties will require the full support of the Office of the Field Solicitor. Finally, the exchange needs to be in the best interest of the United States, not the party pursuing the exchange.

Unlike North Dakota with section lines open for the use and benefit of the public. We here in Montana must rely on public access rights and other prescriptive rights for access, while at the same time protecting private property rights.

The Wilks brothers should have thought twice before purchasing the Anchor Ranch in Blaine County with their **idea** of trading same with BLM to expand their holding in Flat Willow Creek area of Fergus County involving perhaps 2,700 isolated acres in the Durfee Hills along with other BLM landlocked parcels. BLM had no commitment with the Wilks brothers when they purchased the Anchor Ranch. Their idea was to once again open the Bullwhacker Road though the Anchor Ranch for motorized public access. But the whole idea failed to gain public support. So now the Wilks brothers

and their local representative Darryl James have sweeten the pie with yet another deal maker. They propose connecting a public motorized passage through the Snowy Mountain Range across Red Hill Road and working out a Block Management Agreement with FWLP.

If the Wilks brothers achieve their objective of acquiring BLM parcels in Fergus County, this will negatively impact Montana's forever. The brothers will ultimately amass and control vast blocks of ownership. We simply can't afford to give up ownership of these federal parcels. The bottom line is, that it's all about big money, greed, political influence, controlling access to vast blocks of Montana lands. There seems to be more and more pressure to dispose of Federal and State Trust Lands, but once these lands are gone, they are gone forever. So let's stand tall and protect these valued resources.

Let's not manage under mishmash of policies and regulations that leave these lands vulnerable to an assault by big money, greed and political influence. The real truth is crystal-clear. The America that declares the preservation of natural beauty to be public policy must not at the same time dispose of these isolated and landlocked BLM parcels. They are valued for what they are.

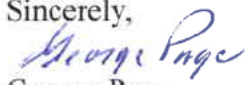
Let's not disrupt the order of all things natural and wild within the Missouri River Breaks National Monument (MRBNM). We don't need motorized public access into the pristine vast badlands landscape. The decision to compromise with a land exchange is pivotal in the struggle to preserve things wild and free. Tell me why do we need to open this area?

I believe BLM managers entrusted with valued lands must stand tall to protect these resources. The disposal of BLM parcels is contrary to the purpose of the monument dedication. The MRBNM is spectacular and ecologically unique to the Montana landscape and must be protected for future generations. Things wild and free are being destroyed by the wrong culture, attitudes and decision making on land ethics that we are entrusted to uphold.

In my view, all this discussion about land exchanges is completely politically driven. The vast monument area is important to us, not for what can be done to it or with it, but as an undisturbed wonder of nature.

I want to be engaged in proceeding with the BLM and the Wilks brothers, so please see that I get a heads-up when meetings are scheduled. I want a voice in these matters. Include my Billings address in your upcoming meetings.

Sincerely,



George Page

4742 Arapaho Lookout

Billings, Montana 59106-9606



Written Comment Form

Bullwhacker Access

Note: Your entire comment, including your address, phone number, e-mail address or other personal identifying information, may be made publicly available at any time. While you can ask us in your comment to withhold from public view your personal identifying information, we cannot guarantee we will be able to do so.

Name:	Aaron Berg
Organization:	
Mailing Address:	P.O. Box 1626
City/State/Zip:	Chinook, MT 59523
Email Address:	

Yes, include me on the mailing list to receive information.

No, do not include my name and address on the mailing list.

All comments must be received or postmarked by March 5, 2015

Please mail or email your comments to:

Upper Missouri River Breaks National Monument
920 NE Main St., Lewistown, MT 59457

blm_mt_public_access@blm.gov

For more information, contact:

Mike Kania, Monument Manager
(406) 538-1950

Thank you for your comments

Comments Instructions

All substantive comments will be addressed. Useful comments are specific, mention particular pages where appropriate, and address one or more of the following: inaccuracies or discrepancies in information; identification of new information relevant to analysis; identification of new impacts, alternatives, or mitigation measures; specific suggestions for improving management direction.

I'm all about the new road being opened, but as a wildlife standpoint it has been good for the mule deer population and other wildlife.



Written Comment Form

Bullwhacker Access

Note: Your entire comment, including your address, phone number, e-mail address or other personal identifying information, may be made publicly available at any time. While you can ask us in your comment to withhold from public view your personal identifying information, we cannot guarantee we will be able to do so.

Name:	DAVE HAIDER
Organization:	
Mailing Address:	Box 513
City/State/Zip:	Chinook MT
Email Address:	DHC INC @ ITS TRIANGLE. Com

Yes, include me on the mailing list to receive information.

No, do not include my name and address on the mailing list.

All comments must be received or postmarked by March 5, 2015

Please mail or email your comments to:

Upper Missouri River Breaks National Monument
920 NE Main St., Lewistown, MT 59457

blm_mt_public_access@blm.gov

For more information, contact:

Mike Kania, Monument Manager
(406) 538-1950

Thank you for your comments

Comments Instructions

All substantive comments will be addressed. Useful comments are specific, mention particular pages where appropriate, and address one or more of the following: inaccuracies or discrepancies in information; identification of new information relevant to analysis; identification of new impacts, alternatives, or mitigation measures; specific suggestions for improving management direction.

GO BACK TALK WITH WILD BROS MOST OF US WILL BE
IN ARE GRAVES BEFORE A NEW ROAD IS BUILT.



Written Comment Form

Bullwhacker Access

Note: Your entire comment, including your address, phone number, e-mail address or other personal identifying information, may be made publicly available at any time. While you can ask us in your comment to withhold from public view your personal identifying information, we cannot guarantee we will be able to do so.

Name:	SAMUEL CARTER
Organization:	
Mailing Address:	P.O. Box 122
City/State/Zip:	CHINOOK MT
Email Address:	scarter@itstriangle

Yes, include me on the mailing list to receive information.

No, do not include my name and address on the mailing list.

All comments must be received or postmarked by March 5, 2015

Please mail or email your comments to:

Upper Missouri River Breaks National Monument
920 NE Main St., Lewistown, MT 59457

blm_mt_public_access@blm.gov

For more information, contact:

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(406) 538-1950

Thank you for your comments

Comments Instructions

All substantive comments will be addressed. Useful comments are specific, mention particular pages where appropriate, and address one or more of the following: inaccuracies or discrepancies in information; identification of new information relevant to analysis; identification of new impacts, alternatives, or mitigation measures; specific suggestions for improving management direction.

I propose to proceed to try and get road on west side of Wilks property, because of Sage grouse issue and wild life use the sage brush flats for grazing.

12/6/2014

To Whom it May Concern:

On December 4th, BLM held a scoping meeting at the District Field Office in Lewistown, advising the public on the potential ramifications of putting a new road into the Bullwhacker area of the Missouri Breaks National Monument. The information provided by the BLM team was very helpful. Mr. Benes led a brief discussion on the history leading to the need to consider the building of a new road. Both the District Manager, Stan Benes, and Monument Manager, Mike Kania, openly stated that they didn't favor a road. However, they also stated the point of the meeting was to lay out the considerations, costs and timeline should this project move forward and to ask for public comment. A rough cost estimate for the two viable options ranged around \$800,000 for the east road and 1 million for the west. Hydrologist, Chad Krause, and the engineer (I didn't get his name) spoke of the challenges in stabilizing the route so the road won't shift and erode, and Mr Kania addressed the potential problem that may arise should the sage grouse be listed as an endangered species. According to Mr. Benes, the road would almost certainly demand an EIS, extending the project out 3-5 years.

Of the public attendees, seven individuals suggested a new option: building a trail system. Two trailheads could be built, one for the east and one for the west, allowing them to meet at the south end of the Anchor Ranch property and form an 11 mile loop. The trail could be designed to allow access by foot, horse and dirt bike. It would be the first non-motorized trail in the Monuments and provide solitude and enjoyment of this remote parcel of land. It was further suggested that the trail could tie into the existing primitive road that goes to the Gilmore cabin (currently inaccessible due to the road closure) and connect with further roads that lead to the overlook and down to the Gist cabin and the Missouri River.

I spoke with a member of the RAC and a Friends of the Missouri Breaks Board member and both favor this option and added other ideas that would greatly enhance the public's use. 1. Develop a series of camp sites along the trail. These would discourage random camping and with fire rings reduce the potential fire risk. 2. Install 2 vault toilets, one at either of the east or west trailheads (to be determined by BLM) and one at the Gilmore cabin (which currently has a very unstable outhouse). 3. If the Gilmore had a stock enclosure, then horsemen/hunters would feel comfortable using this trail.

The engineer said that in the past around \$180,000 was set aside for maintaining the road across the Anchor Ranch property. Since that's not being used for that purpose, Mr Benes said the money is being considered as a way to pay for some of the new road. Since the money isn't fixed to a particular project, why not ear mark it for trail construction, vault toilets and maintenance?

A trail system has much to recommend it. It would provide the public with a safe well thought out loop trail, first in the Monument, provide hunters with access into a remote terrain without the vehicular intrusion, and cause very little impact to the land and on the wildlife. It would buy time for the current/future landowners of the Anchor Ranch to reconsider options. And finally and most importantly uphold the integrity of the Monuments Proclamation.

Sincerely,

Clint Loomis, citizen

cloomis@midrivers.com

12/6/2014

To Whom It May Concern:

On December 4th, BLM held a scoping meeting at the District Field Office in Lewistown, advising the public on the potential ramifications of putting a new road into the Bullwhacker area of the Missouri Breaks National Monument. The information provided by the BLM team was very helpful. Mr. Benes led a brief discussion on the history leading to the need to consider the building of a new road.

Both the District Manager, Stan Benes, and Monument Manager, Mike Kania, openly stated that they don't look forward to building a road. However, they also stated the point of the meeting was to lay out the considerations, costs and timeline should this project move forward and to ask for public comment. A rough cost estimate for the two viable options ranged around \$500,000 for the east road and \$0.8 – 1 million for the west. Hydrologist, Chad Krause, and the engineer, Carl Patten, spoke of the challenges in stabilizing the route so the road won't shift and erode, and Mr Kania addressed the potential problem that may arise should the sage grouse be listed as an endangered species. According to Mr. Benes, the road would almost certainly demand an EIS, extending the project out 3-5 years.

Of the public attendees, seven individuals suggested a new option: building a trail system. Two trailheads could be built, one for the east and one for the west, allowing them to meet at the south end of the Anchor Ranch property and form an 11 mile loop. The trail could be designed to allow access by foot, horse and mountain bike. It would be the first non-motorized trail in the Monuments and provide solitude and enjoyment of this remote parcel of land. It was further suggested that the trail could tie into the existing primitive road that goes to the Gilmore cabin (currently inaccessible due to the road closure) and connect with further roads that lead to the overlook and down to the Gist cabin and the Missouri River.

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Mr Patten said that in the past around \$180,000 was set aside for maintaining the road across the Anchor Ranch property. Since that's not being used for that purpose, Mr Benes said the money is being considered as a way to pay for some of the new road. Since the money isn't fixed to a particular project, why not ear mark it for trail construction, vault toilets and maintenance?

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Sincerely,

Clint Loomis, citizen

cloomis@midrivers.com



Kania, Michael <mkania@blm.gov>

Bullwhacker access issue and land exchange

1 message

Paul and Priscilla <ppcrom@midrivers.com>

Tue, Jan 6, 2015 at 9:23 AM

To: mkania@blm.gov

Dear Mike,

As per our phone conversation on Jan. 6th, 2015. I am in favor of further discussion on a land exchange to open the Bullwhacker area. From the information I have reviewed, it makes sense to exchange some if not all of the proposed Durfee Hills area for the Bullwhacker access. This exchange provides more and easier access to public land. Further discussion between the BLM and the land owners could increase the possibilities of additional private land access or exchange. Possibly in the form of Mt. FWP Block Management.

Regards,
Paul Cromwell
406-366-2869



This email has been checked for viruses by Avast antivirus software.
www.avast.com

Grt Falls

12/2

Bureau of Land Management
Central Montana District
Upper Missouri River Breaks National Monument

Bullwacker Access
SIGN-IN

NAME, MAILING ADDRESS (including zip code), email

Do You Wish to speak during
the Public Comment Period?

PLEASE PRINT LEGIBLE:

RALPH KNAPP, 3018 - 3rd Ave S, Great Falls 59405 rknapp@bresnan.net Yes or No

Bonnie Warren, 4428 - 4th Ave N Gt Falls, 59405 bonniewarren4@hotmail.com Yes or No

Jean Wright, 621 Swan Ct, Gt Falls, 59404 bluesky mtns@gmail.com Yes or No

Cody POLLINGTON 3509 4TH AVE N Yes or No

JOHN BORGREEN 3238 3RD AVE. SO. GREAT FALLS 59405 jbb2@hrcsman.net Yes or No

Arlo Skari PO Box 296 Cloutier, MT 59522 Yes or No

Jim McCollum 2828 Central Ave W GREAT FALLS MT 59404 McCollum14@bresnan.net Yes or No

Dawn James 44 NO LMT CHANCE; HELEN 59601 Yes or No

Kris Hansen 519 1st Ave Havre Yes or No - may be

Ryan Carroll 928 10th Ave. N.W. Yes or No

Mike Badgley Jr 82 41m So Frontage Rd 41m 59405 Yes or No

Jordan Anderson 2021 13th St SW Great Falls MT 59404 jordan.anderson@hotmail.com Yes or No

Randy Gray 2114 3rd Ave No Great Falls MT 59401 randygray@gmail.com Yes or No maybe

Gr + Flls
12/2

Bureau of Land Management
Central Montana District
Upper Missouri River Breaks National Monument

Bullwhacker Access
SIGN-IN

NAME, MAILING ADDRESS (including zip code), email

Do You Wish to speak during
the Public Comment Period?

PLEASE PRINT LEGIBLE:

Frank Carpenter 1236 26th Av SW 59404 frankcarp52@gmail.com Yes or No

Hugh V. Larson 205 5th S. Shelby MT. 59474 Yes or No

DAVID J VAN TIGHEM 1312 3 Ave NO. GREAT FALLS, Mont 59401 Yes or No

Harry Mitchell 4510 13th St So. GTF 59405 Yes or No

Dyrek Van Nyming 6835 43rd S.W. 59404 Yes or No

HUGO J TURBEK 599 TURBEK LN COFFEE CREEK 59404 Yes or No

Dennis Tighe 717 13th St. S.W. G.F. MT Yes or No

Mark Good 1400 First Ave N G.F. MT Yes or No maybe

Gerry Jennings 317 Fox Dr. GF 59404 Yes or No

HART Dolman 3016 Central GF 59401 Yes or No

Yes or No

Yes or No

Yes or No

G + Fills
12/2

Bureau of Land Management
Central Montana District
Upper Missouri River Breaks National Monument
Bullwhacker Access
SIGN-IN

NAME, MAILING ADDRESS (including zip code), email

Do You Wish to speak during
the Public Comment Period?

PLEASE PRINT LEGIBLE:

Seth Kampman

Yes or No

Yes or No

Yes or No

Yes or No

Yes or No

Yes or No

Yes or No

Yes or No

Yes or No

Yes or No

Yes or No

Yes or No

Yes or No

Chak
12/3

Bureau of Land Management
Central Montana District
Upper Missouri River Breaks National Monument

Bullwhacker Access
SIGN-IN

NAME, MAILING ADDRESS (including zip code), email

Do You Wish to speak during
the Public Comment Period?

PLEASE PRINT LEGIBLE:

Cecilia Miller	Yes or <input checked="" type="radio"/> No
Randy Chandler	Yes or <input checked="" type="radio"/> No
Robert Brown Haure	Yes or <input checked="" type="radio"/> No
Aaron Berg	<input checked="" type="radio"/> Yes or <input checked="" type="radio"/> No
Art Kleinjan	Yes or <input checked="" type="radio"/> No
Chad Hulund	<input checked="" type="radio"/> Yes or <input checked="" type="radio"/> No
Jack Brady	Yes or <input checked="" type="radio"/> No
Chris Bergman	Yes or <input checked="" type="radio"/> No
Clyde Douberk	Yes or <input checked="" type="radio"/> No
Jim BRENNAN	Yes or <input checked="" type="radio"/> No
Eric Schweigert	Yes or <input checked="" type="radio"/> No
Jim Donovan	Yes or <input checked="" type="radio"/> No
Nick Siebrasse	Yes or <input checked="" type="radio"/> No

Chnk

12/3

Bureau of Land Management
Central Montana District
Upper Missouri River Breaks National Monument

**Bullwhacker Access
SIGN-IN**

NAME, MAILING ADDRESS (including zip code), email

Do You Wish to speak during
the Public Comment Period?

PLEASE PRINT LEGIBLE:

Elmer Kutzler	Yes or No ?
Jeremy McKellar	Yes or <input checked="" type="radio"/> No
BEN HILMAN 970 LINCOLN AVE, HAVRE MT 59501	Yes or No
Kent Gilge 4145 70 th Ave W Havre MT 59501	<input checked="" type="radio"/> Yes or No
Kody Gilge 523 4th Ave Havre MT 59501	Yes or <input checked="" type="radio"/> No
DALE MABER 1245 CLEVELAND AVE	Yes or <input checked="" type="radio"/> No
Erv Hamblock 1139 Willow Ave Havre MT 59501	Yes or <input checked="" type="radio"/> No
BILL SEABERG 1111 Cleveland Ave, HAVRE MT. 59501	<input checked="" type="radio"/> Yes or No
Robert Dannels P.O. Box 111 Chinook MT 59523	Yes or <input checked="" type="radio"/> No
CARL WISS CHINOOK MT 59523	Yes or <input checked="" type="radio"/> No
Samuel White Chinook MT 59523	<input checked="" type="radio"/> Yes or No
FRANK DePriest Chinook MT 59523	Yes or <input checked="" type="radio"/> No
Dustan Wyberg Havre MT 59501	Yes or <input checked="" type="radio"/> No

Chuk
12/3

Bureau of Land Management
Central Montana District
Upper Missouri River Breaks National Monument

Bullwhacker Access

SIGN-IN

NAME, MAILING ADDRESS (including zip code), email

**Do You Wish to speak during
the Public Comment Period?**

PLEASE PRINT LEGIBLE:

NAME, MAILING ADDRESS (including zip code), email	Do You Wish to speak during the Public Comment Period?
PLEASE PRINT LEGIBLE:	
MAX → Amy Daniel 1955 cnty Rd 462W Havre MT 59501	Yes or <input checked="" type="radio"/> No
Kin Tashu 1336 26.36991 Hwy 2 west Havre MT. 59501	Yes or <input checked="" type="radio"/> No
	Yes or No
	Yes or No
	Yes or No
	Yes or No
	Yes or No
	Yes or No
	Yes or No
	Yes or No
	Yes or No
	Yes or No
	Yes or No

Chnk
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Central Montana District
Upper Missouri River Breaks National Monument

Bullwhacker Access
SIGN-IN

NAME, MAILING ADDRESS (including zip code), email

Do You Wish to speak during
the Public Comment Period?

PLEASE PRINT LEGIBLE:

LYLE KNUDSON	Yes or <input checked="" type="radio"/> No
BRIAN HOCKETT 315 14 TH ST. W. HAURE, MT 59501	Yes or <input checked="" type="radio"/> No
Mert & Vicki Freyholtz 325 7 th ST W Gilford, mt. 59525	Yes or <input checked="" type="radio"/> No
MITCH FORSYTH 1530 12 TH AVE HAURE, MT 59501	Yes or <input checked="" type="radio"/> No
MARK WEBER 2885 Old Hwy Rd. E. Chinook, MT 59523	Yes or <input checked="" type="radio"/> No
Russ Fitz' 1145 Grant Ave Haure MT 59501	<input checked="" type="radio"/> Yes or <input checked="" type="radio"/> No
Tom Brady 1135 Cleveland Ave Haure, Mt 59501	Yes or <input checked="" type="radio"/> No
JOE NABER 617 16 TH ST HAURE MT	Yes or <input checked="" type="radio"/> No
Jim LAMMERDING 4433 16 TH ST. N.E. HAURE, MONTANA 59501	Yes or <input checked="" type="radio"/> No
DAN SCHALUB 3770 9 TH St W HAURE, MT. 59501	Yes or <input checked="" type="radio"/> No
Dan Harry 217 10 th St Chinook Mt 59507	Yes or <input checked="" type="radio"/> No
Dick Andersen P.O. 352 Chinook, MT 59523	Yes or <input checked="" type="radio"/> No
DAVE HAIDER Box 513 Chinook MT 59523	<input checked="" type="radio"/> Yes or <input checked="" type="radio"/> No

Chnk
12/3

Bureau of Land Management
Central Montana District
Upper Missouri River Breaks National Monument
Bullwhacker Access
SIGN-IN

NAME, MAILING ADDRESS (including zip code), email

Do You Wish to speak during
the Public Comment Period?

PLEASE PRINT LEGIBLE:

Greg Durward	606 4th AV. Havre MT. 59501	Yes or <input checked="" type="radio"/> No
Mike Bayson	1012 New York St Chinook, MT	Yes or <input checked="" type="radio"/> No
Scott Hemmer	1721 Rich St W Havre, MT	Yes or <input checked="" type="radio"/> No
Joshua Keller	204 77th Ave West Havre, MT	Yes or <input checked="" type="radio"/> No
William I Harbell	540 Cleveland St Chinook MT	Yes or <input checked="" type="radio"/> No
Robert Farndon	1069 Lincoln Ave Havre MT	Yes or No ?
Lewis Skinner	3107 S Wagner, Mt.	Yes or No
Bob Sharples	Po Box 1418 Chinook, MT	Yes or <input checked="" type="radio"/> No
		Yes or No
		Yes or No
		Yes or No
		Yes or No
		Yes or No

Lew 12/4

Bureau of Land Management
Central Montana District
Upper Missouri River Breaks National Monument

Bullwhacker Access
SIGN-IN

NAME, MAILING ADDRESS (including zip code), email

Do You Wish to speak during
the Public Comment Period?

PLEASE PRINT LEGIBLE:

Tom Darnell, 401 Seventh Ave South, LT greenpeaplan@hotmail.com	Yes or <input checked="" type="radio"/> No
Greg Carter, 19102 Upper Flat Willow, Gross Range MT 59032	Yes or <input checked="" type="radio"/> No
Matt Birdwell 610 W Barnes Lewistown MT 59457	Yes or <input checked="" type="radio"/> No
Beth Kampschroer 324 Fuller, Suite C-4 Helena MT 59601	Yes or <input checked="" type="radio"/> No
Jon Edwards Lewistown, MT	Yes or <input checked="" type="radio"/> No
DARRIE JAMES 441 N. CMT CIRCLE HELENA MT	Yes or <input checked="" type="radio"/> No
R. Moody 109 Bach Lewistown	<input checked="" type="radio"/> Yes or No
Matthia Vogt 305 Cutler St Helena MT	<input checked="" type="radio"/> Yes or No
Jim Greene " " " "	Yes or <input checked="" type="radio"/> No
Bill Cunningham Box 1404 Choteau, MT	<input checked="" type="radio"/> Yes or No
DAVE MARI 102 SNOWY MOUNTAIN DR., LEWISTOWN, MT 59457	Yes or No
	Yes or No
	Yes or No

Low 12/4

Bureau of Land Management
Central Montana District
Upper Missouri River Breaks National Monument

Bullwhacker Access

SIGN-IN

NAME, MAILING ADDRESS (including zip code), email

Do You Wish to speak during
the Public Comment Period?

PLEASE PRINT LEGIBLE:

Mark Schwemeyer Yes or No

Sara Meloy 324 Fuller Ave, Ste C4 Helena, MT 59601 Yes or No

Matt Plagem Yes or No

GARY SWAGEL Yes or No

Dwight Reth Yes or No

Clive Rooney Yes or No

Michael Chapman Yes or No

Yes or No

Yes or No

Yes or No

Yes or No

Yes or No

Yes or No

maybe

Lew 12/4

Bureau of Land Management
Central Montana District
Upper Missouri River Breaks National Monument

Bullwhacker Access
SIGN-IN

NAME, MAILING ADDRESS (including zip code), email

Do You Wish to speak during
the Public Comment Period?

PLEASE PRINT LEGIBLE:

Mary V. Jones Yes or No

GARY AMERMAN Yes or No

Mike Sedgwick 19111 Upper Flat Willow Grass Range 59032 Yes or No

DOUG KEINGS 107 DUCK HAVEN LANE Yes or No

Sandy Youngbauer 712 W Main St Ste 210 Lewisstown, MT 59457 ^{commissioners@co.fergus.mt.us} Yes or No

Gordon Wentworth 816 3rd Ave S, Lewisstown MT Yes or No

Clint Laornis mfrieze@midrivers.com Lewisstown Yes or No

Mary J Frieze 1116 West Evelyn St Lewisstown Yes or No

Yes or No

Yes or No

Yes or No

Yes or No

Yes or No

Yes or No

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

Date
Thursday
JAN 15 2015

Public Mtg.

VISITOR LOG

Visitor's Printed Name	Name of Your Organization	Name of Person You Are Visiting	Purpose of Your Visit	Badge No.	Badge Returned?	Time In	Time Out
<i>GARY BENES</i>	<i>LFO</i>	<i>BRAD PURDY</i>	<i>Public Mtg</i>	—	<input checked="" type="checkbox"/>	<i>3:30</i>	<i>8pm</i>
<i>[Signature]</i>	<i>Gov't. ID</i>	<i>B.X.M.</i>	<i>6-8 IN AFB</i> <i>Conf. Rms.</i>				
<i>MIKE KANIA</i>	<i>LFO</i>	<i>BRAD PURDY</i>		<i>#5</i>	<input checked="" type="checkbox"/>	<i>3:30</i>	<i>8pm</i>
<i>[Signature]</i>	<i>Gov't. ID</i>	<i>B.X.M.</i>		<i>BRN</i>			
<i>CARL PATTEN</i>	<i>LFO</i>	<i>BRAD PURDY</i>		<i>#6</i>	<input checked="" type="checkbox"/>	<i>3:35</i>	<i>8pm</i>
<i>[Signature]</i>	<i>Gov't. ID</i>	<i>B.X.M.</i>		<i>BRN</i>			
<i>GEOFF BEYERSDORF</i>	<i>LFO</i>	<i>BRAD PURDY</i>		—	<input type="checkbox"/>	<i>4:20</i>	<i>8pm</i>
<i>[Signature]</i>	<i>Gov't. ID</i>	<i>B.X.M.</i>					

Reviewed by: *Johnny Jones* Date **FEB 04 2015**

Form 1100-1
(January 2007)

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

VISITOR LOG

After hours
Meeting.
No badges issued
to Public
attendees.

Date

THURS.

1/15/15

Visitor's Printed Name	Name of Your Organization	Name of Person You Are Visiting	Purpose of Your Visit	Badge No.	Badge Returned?	Time In	Time Out
SPLINTER, Joseph	Public Meeting	Public Meeting	Public mtg.				
Visitor's Signature	Form of I.D.	Organization of Person You Are Visiting					
	DL						
Visitor's Printed Name	Name of Your Organization	Name of Person You Are Visiting	Purpose of Your Visit	Badge No.	Badge Returned?	Time In	Time Out
MOODY RON			Public mtg.				
Visitor's Signature	Form of I.D.	Organization of Person You Are Visiting					
	DL						
Visitor's Printed Name	Name of Your Organization	Name of Person You Are Visiting	Purpose of Your Visit	Badge No.	Badge Returned?	Time In	Time Out
GIBSON, John			Public mtg.				
Visitor's Signature	Form of I.D.	Organization of Person You Are Visiting					
	DL						
Visitor's Printed Name	Name of Your Organization	Name of Person You Are Visiting	Purpose of Your Visit	Badge No.	Badge Returned?	Time In	Time Out
KRINGS, William			Public mtg.				
Visitor's Signature	Form of I.D.	Organization of Person You Are Visiting					
	DL						
Visitor's Printed Name	Name of Your Organization	Name of Person You Are Visiting	Purpose of Your Visit	Badge No.	Badge Returned?	Time In	Time Out
Schwalmeyer, Mark			Public mtg.				
Visitor's Signature	Form of I.D.	Organization of Person You Are Visiting					
	DL						

Reviewed by: Tommy Jones Date FEB 04 2015

Form 1100-1
(January 2007)

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

Date: Public Mtg.
1/15/15

VISITOR LOG

Visitor's Printed Name	Name of Your Organization	Name of Person You Are Visiting	Purpose of Your Visit	Badge No.	Badge Returned?	Time In	Time Out
Webster, Margaret			Public Mtg				
Visitor's Signature X Margaret Webster	Form of I.D. DL	Organization of Person You Are Visiting					
Visitor's Printed Name SVERAENE NEUMAN	Name of Your Organization	Name of Person You Are Visiting	"				
Visitor's Signature 	Form of I.D. DL	Organization of Person You Are Visiting					
Visitor's Printed Name THOMAS TYFE JR	Name of Your Organization	Name of Person You Are Visiting	"				
Visitor's Signature 	Form of I.D. DL	Organization of Person You Are Visiting					
Visitor's Printed Name THOMPSON, ROY	Name of Your Organization	Name of Person You Are Visiting	"				
Visitor's Signature X Roy J Thompson	Form of I.D. DL	Organization of Person You Are Visiting					
Visitor's Printed Name FITZGERALD, SARAH	Name of Your Organization	Name of Person You Are Visiting	"				
Visitor's Signature X	Form of I.D. DL	Organization of Person You Are Visiting					

Reviewed by: Jimmy Jones Date FEB 04 2015

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

Date *Public Mtg.*

VISITOR LOG

Visitor's Printed Name	Name of Your Organization	Name of Person You Are Visiting	Purpose of Your Visit	Badge No.	Badge Returned?	Time In	Time Out
<i>Greene, James</i>			<i>Public mtg</i>				
Visitor's Signature <i>x James Greene</i>	Form of I.D. <i>DL</i>	Organization of Person You Are Visiting					
<i>Woff, Martha</i>			<i>''</i>				
Visitor's Signature <i>x Woff</i>	Form of I.D. <i>DL</i>	Organization of Person You Are Visiting					
<i>Darryl, James</i>			<i>''</i>				
Visitor's Signature <i>x Darryl</i>	Form of I.D. <i>DL</i>	Organization of Person You Are Visiting					
<i>Tuback, Hugo</i>			<i>''</i>				
Visitor's Signature <i>x Tuback</i>	Form of I.D. <i>DL</i>	Organization of Person You Are Visiting					
<i>Kampchorr, Beth</i>			<i>''</i>				
Visitor's Signature <i>x Kampchorr</i>	Form of I.D. <i>DL</i>	Organization of Person You Are Visiting					

Reviewed by: *Jimmy Fona* Date *FEB 04 2015*

Form 1100-1
(January 2007)

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

Date
Public Mtg
1/15/15

VISITOR LOG

Visitor's Printed Name	Name of Your Organization	Name of Person You Are Visiting	Purpose of Your Visit	Badge No.	Badge Returned?	Time In	Time Out
OTSTOT, Roger			Public Mtg				
Visitor's Signature	Form of I.D. DL	Organization of Person You Are Visiting					
DevFOLD, Mike	DMJ Refall						
Visitor's Signature	Form of I.D. DL	Organization of Person You Are Visiting					
Gilbertz, SUSAN							
Visitor's Signature	Form of I.D. w/ Mike Penfold	Organization of Person You Are Visiting					
Penfold, DONA							
Visitor's Signature	Form of I.D. DL	Organization of Person You Are Visiting					
FRAZER, Joe							
Visitor's Signature	Form of I.D. DL	Organization of Person You Are Visiting					

Reviewed by: Tommy Jones Date FEB 04 2015

Form 1100-1
(January 2007)

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

Date
Public Mtg
1/15/15

VISITOR LOG

Visitor's Printed Name	Name of Your Organization	Name of Person You Are Visiting	Purpose of Your Visit	Badge No.	Badge Returned?	Time In	Time Out
<i>Bauer, George</i>							
Visitor's Signature <i>X [Signature]</i>	Form of I.D. <i>DL</i>	Organization of Person You Are Visiting	<i>Public Mtg</i>				
<i>Powell, James</i>							
Visitor's Signature <i>X [Signature]</i>	Form of I.D. <i>DL</i>	Organization of Person You Are Visiting	<i> </i>				
<i>Jingyi, DAVID</i>							
Visitor's Signature <i>X [Signature]</i>	Form of I.D. <i>D.L.</i>	Organization of Person You Are Visiting	<i> </i>				
<i>HARDING, RITA</i>							
Visitor's Signature <i>X [Signature]</i>	Form of I.D. <i>DL</i>	Organization of Person You Are Visiting	<i> </i>				
<i>LEA, BERNARD</i>							
Visitor's Signature <i>[Signature]</i>	Form of I.D. <i>DL</i>	Organization of Person You Are Visiting	<i> </i>				

Reviewed by: *Jimmy Lopez* Date: *FEB 04 2015*

Form 1100-1
(January 2007)

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

Date
Public mtg
1/15/15

VISITOR LOG

Visitor's Printed Name	Name of Your Organization	Name of Person You Are Visiting	Purpose of Your Visit	Badge No.	Badge Returned?	Time In	Time Out
French, Brett	Billings CAZ						
Visitor's Signature <i>Brett French</i>	Form of I.D. DL	Organization of Person You Are Visiting					
Visitor's Printed Name McDERMAND, DIANE	Name of Your Organization	Name of Person You Are Visiting	Purpose of Your Visit	Badge No.	Badge Returned?	Time In	Time Out
Visitor's Signature <i>Diane McDermand</i>	Form of I.D. DL	Organization of Person You Are Visiting					
Visitor's Printed Name	Name of Your Organization	Name of Person You Are Visiting	Purpose of Your Visit	Badge No.	Badge Returned?	Time In	Time Out
Visitor's Signature	Form of I.D.	Organization of Person You Are Visiting					
Visitor's Printed Name	Name of Your Organization	Name of Person You Are Visiting	Purpose of Your Visit	Badge No.	Badge Returned?	Time In	Time Out
Visitor's Signature	Form of I.D.	Organization of Person You Are Visiting					
Visitor's Printed Name	Name of Your Organization	Name of Person You Are Visiting	Purpose of Your Visit	Badge No.	Badge Returned?	Time In	Time Out
Visitor's Signature	Form of I.D.	Organization of Person You Are Visiting					

Reviewed by: *Johnny Finner* Date FEB 04 2015

**Bullwhacker Road Access Restoration Scoping Meeting
GreatFalls, MT 12/2/2014**

Questions/Comments from Audience

Why not Imminent Domain?

Any chance of an appeal on Robinson/Bullwhacker Road decision?

What would a road like this cost?

Are there any sage grouse leks within the proposed routes? How many?

Are you definitely going to build a road?

Do you have the funding for a road?

Is there a no road option?

What is the status of the pipeline? Is it active?

Is there a gas line easement?

Is cultural inventory being conducted?

You continuously stated you didn't have public support. Don't remember ever being asked.

So far you have done an excellent job showing how difficult the new route is. Again, why not Imminent Domain option? Montanans have a history of bucking trends, why not visit idea of Imminent Domain? If public is informed...we may prevail.

Who is the State Director?

If you have a million bucks to build a road why can't you use it to buy an easement instead?

Is there a new proposal from Wilks Bros. that didn't include the Durfee Hills? I have a proposal in hand (he did, I saw a map in his hand with what appeared to be the Wilks adjusted map eliminating the Durfee Hills). BLM would gain approx. 4K acres and Wilks approx. 3.4K.

Do we have an estimate of what it would cost to maintain this road once built?

What was the cost of the parcel (Anchor Ranch Bullwhacker Rd section)?

On powerpoint presentation didn't see any fences between the private sections and BLM.

Are there any restrictions in your agency as to how close you can build a road adjacent to private land?

What people in Fergus County had opportunity to object to exchange proposal?

Was there public comment?

Did BLM present what the exchange proposals were?

There was an outpouring of mis-information on this whole issue. People were not aware of what the Wilks proposals were.

Why take the land or build road if the Wilks are offering it for exchange?

There has never been a forum for pro-exchange proponents.

Is the missing link regarding this whole issue the fact there was no public meetings on the whole issue?

I was told that if the BLM moved towards an exchange with the Wilks they would open the road to the public.

I appreciate the BLMs effort on road issue and am very familiar with the type country this road will be built on. Am also a public land rancher and remind myself that the public lands in question don't just belong to the residents of Fergus County but to the people of the United States and any decision regarding those public lands should include the public whether we agree with the decision or not. *(About as close as I can remember...was writing fast, not sure I got all of it, though I thought it a highly commendable piece of oration).*

Was there any public notice? Read it in paper buried on like page 24. You can do better, USFS guy is on TV all the time.

Commend the Agency for these meetings but obvious to me we are not going to reach a decision. Need to revisit this, perhaps a group to work on this process. Get all the players, Agency specialists, ranchers, county commissioners, public, interested parties. But for now, scoping it (Road issue) this way is unproductive.

Can someone respond to above suggestion?

Why an EA and not an EIS?

Who is the Secretary of the Interior?

Are you familiar with Doc Johnson's place? Same sort of thing with this road issue. Planned a road, never built it. Never seen BLM build roads...only close them.

When do you think alternatives will be ready to be advertised?

Which would be the easiest route (East or West)?

Were there springs, ephemeral streams in the drainages? Are they riparian areas?

Bullwhacker Restoring Public Access

Great Falls Scoping Meeting

December 2, 2014

Question Summary

Is the area still rebounding from glaciation?

Is the BLM considering building bridges for the coulee crossings?

Why not use eminent domain?

Any chance for a retrial of the Robinson Decision?

What is the cost of the East route?

How many leks on the east side? West side?

Are you definitely going to build a road?

Do you have funding to build a road?

How many people use the road?

What is the status of the pipeline?

Will cultural surveys be conducted?

If the public were interested in re-looking at a land exchange would BLM revisit that issue?

Could BLM legally challenge the original decision (court) and/or use eminent domain?

Could BLM get an easement from the Wilks?

Is there a new land exchange proposal from the Wilks?

Has BLM calculated the cost of maintenance?

Is there fencing between the BLM and private?

Was there a public venue for comments on the Wilks proposal?

Before today has there been opportunity for public comment on the Wilks proposal?

Why go through eminent domain when the Wilks have already offered the land?

Has there been a forum for a pro exchange group to comment on the Wilks proposal?

Scoping for this issue is unproductive. Has the BLM considered putting together a working group to address this issue?

Which route would be easier to build, cost less, and be maintainable?

Has the agency considered the impacts to ephemeral streams, springs, and riparian areas?

Questions from the Bullwhacker Road Meeting in Chinook, MT on December 3, 2014 at the Chinook Motor Inn, 6 pm. Portions questions or comments in parentheses we added after the fact for clarification purposes.

1. Why can't we use the road above Spencer Cow Camp? I was told by the game warden that I would be cited if he went through the gate onto public land. I was told by someone at the Lewistown Field Office that it was closed in 2008 to protect elk habitat. Why don't we just open the existing road?
2. Is BLM in support of access into the Bullwhacker area? Why was Spencer Cow Camp road marked as closed? You have given us lots of reasons not to build a road, but there is already a road through Spencer Ridge – why can't we use that road?
3. Isn't the private portion of the road on Spencer Ridge already in the Block Management program?
4. Who made the decision to close a mile of road (on BLM land) for every mile of road we build (on BLM land)?
5. Can we say or put a sign on this road (Spencer Ridge Road) that says that the road is impassable by two wheel drive vehicles to release BLM of any liability?
6. So we basically have two options – east and west. Which one does the BLM want?
7. Opinion: "Stay on the east side"
8. Why don't you make the road follow exactly on the property line to avoid the coulee crossing? (referring to the first big coulee crossing on the north end of the east route)
9. Runoff leads to washed out culverts and lost crossings, so why don't you use low water crossings like did on the county road where it crosses Suction Creek? (referring to the new crossing installed by the county in T26N R21E Sec. 16)
10. If sage grouse are listed, then this whole plan is dead in the water anyway, right?
11. How far will the Bullwhacker Road keep going (past the Wilks' property)? What about the Ervin Ridge Road? Why are roads (in the Monument) with no public access open? So the landowner (adjacent to public land containing roads classified as "open with landowner permission" in the Monument RMP) has more right/authority than the average citizen?
12. Opinion: Give up/close the roads that don't have public access.
13. I thought the BLM land was public. Why not close roads with no access?
14. Opinion: Shut off access on BLM land (close roads in Bullwhacker area) beyond Wilks' private land.
15. Why don't we close the road (the Bullwhacker Road across BLM in T25N R20E Sec. 4) to Wilks' private land and use that as part of the roads removed to mitigate the road built to access Bullwhacker?
16. This is a scoping effort. What other alternatives are there? \$500,000 seems like an underestimate to me. Work with Wilks'. Public working group. Look at other alternatives and be more creative.
17. Everyone is interested in access, but there are monumental obstacles – habitat, engineering, maintenance costs, environmental pressure and the threat of lawsuits, and sage grouse. This

issue may be dead before it even gets started. We can't close the door on the opportunity for a land exchange. Why don't we sit down and revisit the exchange – it could solve tons of these issues before spending thousands of dollars.

18. How long will it take to negotiate a land swap? Six to eight years?
19. I would like to discuss with Wilks' – give up the land by Lewistown? I'm not willing to give one square inch (of land). We have a right to those public lands and I want access to those public lands.
20. Does BLM lease ground (grazing permit) to Wilks'? Why not take their grazing permit away?
21. Opinion: The ground we would be trading for (in a land exchange) is not accessible (to the public). It is a way more viable option.
22. Fergus County won't "buy into" a land exchange. I thought BLM was federal and therefore it doesn't belong to Fergus County?
23. Red marks on this map indicate closed roads. If we closed these roads (during the RMP), did we get other roads opened?
24. Back in the day, trying to trade 40 acres of private for 40 acres of BLM went nowhere. Do you have to be a millionaire or have more land to get the BLM to make a trade?
25. What is the acre for acre exchange on the modification to the Wilks' original proposal? Twice the number of acres for Blaine County versus Fergus County? Why wasn't this modification considered?
26. Won't roads just end up in court just like the land exchange?
27. So the land swap is off the table and our only options are an east or west route?
28. Why don't (we) challenge the status of the Bullwhacker Road as a private road?
29. I had a road across my private land declared a public road due to open and notorious use that I never protested. Is there such a thing as open and notorious use?
30. Why didn't the BLM just buy Robinson's ranch?
31. I was told by a BLM employee in Lewistown that for every person that wants access (to the Monument) that 5 people don't want us to have access. I was told most of those people are within the BLM.
32. How many acres of private land do Wilks' own (in the area referred to as "the Wilson Cow Camp")? Has anyone offered to buy the land outright? What about an easement?

Bullwhacker Restoring Public Access

Chinook Scoping Meeting

December 3, 2014

Question Summary

Why doesn't the BLM open the Spencer Cow camp road?

Is BLM truly interested in gaining access into the Bullwhacker?

If there are concerns with safety on the Spencer Cow camp road is there any way the BLM could relinquish responsibility for public safety if individuals utilize the road?

Given the cost and maintenance has BLM considered the use of low water crossings instead of culverts for the coulee crossings?

If according to travel management there is no access to BLM roads that are only seasonally opened why are they still considered open?

BLM should consider giving up those roads (closing) that aren't generally open or accessible.

Has BLM considered that private landowners who limit access through their lands to public lands either shouldn't have access or those roads adjacent to their private should be given first consideration for closing?

Is BLM open to considering there are more alternatives? There is still room to work with the Wilks and/or forming a working group are just two that come to mind.

There are "monumental" obstacles such as road costs, wildlife, environmental, Greater-sage Grouse, etc. has BLM considered not closing the door on an opportunity to visit on a land exchange?

How long would the land exchange process take?

Why can't the BLM use the Wilks grazing permit as leverage for a land exchange?

BLM cannot be giving Fergus county residents preference when the subject lands belong to all of the American public.

When the Monument closed roads under travel management did they open others?

There are many residents with small parcels they would be interested in exchanging, how come a large, wealthy landowner is given preference in consideration for an exchange?

Are the Friends of the Monument supportive of access?

Why is the BLM letting a small group of Fergus county residents take precedence over a larger public?

Is there such a thing as "open and notorious" use of a road?

Why didn't the BLM buy the Anchor Ranch?