



**Montana  
Native  
Plant  
Society**

*To observe - conserve - educate*

P.O. Box 8783 Missoula, MT 59807

CBNG Draft SEIS Comments  
Bureau of Land Management  
P.O. Box 219  
Miles City, MT 59301

12 March 2007

Dear Bureau of Land Management,

We are writing on behalf of more than 600 members of the Montana Native Plant Society (MNPS). We are an organization dedicated to preserving, conserving and studying the flora of Montana and educating the public on the values of the native flora and its habitats. We are writing to comment on the Draft Supplement to the Montana Statewide Oil and Gas Environmental Impact Statement.

We believe that the Bureau of Land Management (BLM) is attempting to protect natural resources by choosing Alternative H as the preferred alternative. We believe the idea of using screens is good as is doing analyses at the watershed level. BLM also appears to acknowledge the importance of native vegetation and the threat from noxious weeds. Nonetheless, we believe that several improvements should be made to the preferred alternative in order to protect the natural resources of the area.

We are not convinced that the screening method in the preferred alternative is adequate to prevent long-term environmental degradation. No restrictions on the pace of development would occur if monitoring data indicates that impacts to resources are being mitigated. This is inadequate protection because many types of degradation have significant lag times. These sorts of problems (e.g., riparian woodland decline from salt water) are not immediately apparent and can only be detected with long-term monitoring. Short-term monitoring may falsely suggest that impacts are being mitigated. We believe that Alternative G would better avoid these sorts of problems by placing a limit on the pace of development. With Alternative G difficult-to-detect degradation would impact less land before being discovered and mitigated for.

We are also concerned that none of the alternatives proposes to take into account the cumulative impacts of methane development on private as well as public lands. Significant habitat degradation could occur in watersheds where a large proportion of the land is in private ownership. The screens should involve landscape-level planning that includes cumulative effects analyses.

We do not believe that the BLM has adequate knowledge of the current location and extent of noxious weeds in the Powder River Basin where most development will first occur. The GAP analysis based on satellite imagery is woefully inadequate for weed mapping, and the SEIS indicates that on-the-ground weed mapping has not been done east of Yellowstone County

(DSEIS, p.3-109). Baseline weed location data is needed to properly screen development proposals. Reliable baseline data can only be obtained through on-the-ground surveys conducted by knowledgeable personnel. It is also not clear from the DSEIS who will monitor roads and well sites for weed invasions. We strongly believe that monitoring should be done by persons paid for by the developers but independent of the developers. We do not want the fox guarding the chicken house.

Finally, we do not believe that the DSEIS provides adequate guidelines for vegetation restoration of roads and other areas impacted by methane development. Roads should be reclaimed with native vegetation immediately after they are no longer necessary. Refund of bonds should be contingent upon this requirement. The DSEIS (p. 4-229) indicates that only 60% of the disturbed vegetation will have to be covered with prescribed vegetation. We do not believe that a loss of 40% of the vegetation is acceptable because it leaves the area open for weed invasion. The DSEIS also indicates that a 1999 BLM seeding policy will be followed; however, much has been learned about restoring grasslands in the past eight years. We suggest that BLM revise its seeding policy to reflect our current understanding of this important procedure.

In summary, we support the idea of screening CBNG proposals but believe that phased development is also desirable. Cumulative effects of development on both public and private lands must be accounted for in the screening process. Current and accurate weed mapping should be conducted to provide a baseline and help guide the screening process. Guidelines for revegetation and monitoring should be improved before development begins. Thank you for this opportunity to comment.

Sincerely,

Susan Winslow  
President

Peter Lesica  
Conservation Chair