

  
MONTANA NATIVE  
PLANT SOCIETY  
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19 October 2020

Dear BLM Billings District,

Thank you for the opportunity to comment on the environmental assessment (EA) and finding of no significant impacts (FONSI) for the GCC-McKamy Gypsum Exploration Project (DOI-BLM-MT-C020-2020-0022-EA). We are writing on behalf of over 700 members of the Montana Native Plant Society (MNPS). The Society is a non-profit organization dedicated to preserving, conserving, and studying Montana's native plants and plant communities, and educating the public about the values of our native flora and its habitats. We express our concerns about the FONSI and the inadequacies of the EA in the following paragraphs.

The desert in the Gyp Springs area was designated as the Pryor Foothills Area of Critical Environmental Concern to protect the rare plants and plant communities occurring in the area. The EA documents the presence of at least four plants listed as species of concern by the Montana Natural Heritage Program. One of these, *Physaria pachyphylla*, is globally rare because the only place on earth it is known to occur is in the Pryor Mountains foothills (Grady and O'Kane 2007). The other three plants listed in the EA are considered rare in Montana where they occur only in the Pryor Mountain Desert (Lesica and Achuff 1992). The EA and FONSI suggest that threats to *Physaria* will be mitigated by having a botanist guiding the miners away from individual plants. We believe that BLM should choose the botanist to be certain that (s)he is competent and prioritizes conservation of the ACEC. Nonetheless, we believe this strategy is short-sighted. Even if individual *Physaria* plants are not destroyed, the project will certainly degrade the habitat (see below) and thus curtail the growth and persistence of the *Physaria* population. The EA and FONSI indicate that there is not going to be any protection or mitigation for the three species that are at the northern edge of their range and considered rare in Montana (*Astragalus oreganus*, *Mentzelia pumila* and *Linanthus caespitosus*). Section 3.2.1 of the Billings Field Office ARMP (MD Veg/SSP-6) states that "BLM-authorized activities should also maintain or improve habitat for special status plants." The submitted Plan of Operation does not address this issue.

The Pryor Foothills Area of Critical Environmental Concern also protects rare plant communities. It is important to protect rare communities because they are likely to harbor rare insects, fungi and microbes that are not so easily inventoried. Two globally rare plant communities occur in or near the ACEC, the *Atriplex nuttallii/Artemisia spinescens* community type and the *Chrysothamnus nauseosus/Eriogonum brevicaulis* community type (DeVelice and Lesica 1993). The area where the ACEC occurs is part of the Wyoming Basin Cliff and Canyon Ecological System which is considered to be "potentially at risk" (S3) by the Montana Natural Heritage Program. The EA and FONSI do not address threats to plant communities or the soil that supports them. The Plan of Operation proposes a reclamation plan that is woefully inadequate. Simply digging up the soil and then putting it back and planting it with a generic seed mix will not restore the sensitive vegetation

types that occur in the project area. Grupo Cementos de Chihuahua has not demonstrated that they can restore the sensitive plant communities. The ACEC occurs in the most arid region of Montana. The harsh climate and soils likely means that true restoration will take decades or more. The EA prepared by BLM states that most of the project area falls with an area that is rated “severe” for potential soil erosion. The EA also states that a significant portion of the project area is “poorly suited for reclamation. Clearly the project is being proposed for a high-risk area. The proposed EA issue 2 is “How will the proposed action affect native vegetation after surface disturbance?” This issue was given short shrift even though the Plan of Operation provides little detail on how the plant communities and the habitat for the globally rare *Physaria pachyphylla* would be restored. Standards for restoration success following the disturbance are not described. We believe that the finding of no significant impact is not well founded, and impacts to rare plants, rare plant communities and delicate soils need a great deal more consideration. Two-track roads that “are almost in a reclaimed back to the original vegetative state” should also be reclaimed to native plant communities after being used for the operation. A BLM botanist should monitor the reclamation and possible noxious weed invasions.

In the 2015 Resource Management Plan BLM recommended that The Pryor Foothills Area be withdrawn from mineral entry. We realize that the ACEC has not yet been withdrawn from mineral entry. However, the designation of the area as an ACEC by BLM, the designation as part of an Important Plant Area by the Montana Native Plant Society (<https://www.mtnativeplants.org/wp-content/uploads/2018/07/IPA-Pryor-Mountains.pdf>) and the information presented above clearly indicates that the area is not appropriate for commercial mining activity, and we feel confident that a competent NEPA analysis would demonstrate this. If full-scale mining is not going to happen, why would Grupo Cementos de Chihuahua want to waste the resources for this project and why would BLM allow it? We urge BLM to attempt to convince the applicants to abandon this project and to deny their application if they insist on moving forward. At the very least we ask BLM to do a more thorough EA and insist that the operator prepare a more thorough plan of operations.


DeVelice, R.E. and P. Lesica. 1993. Plant community classification for vegetation on BLM lands, Pryor Mountains, Carbon County, Montana. Montana Natural Heritage program, Helena, MT.

Grady, B.R. and S.L. O’Kane 2007. New Species and Combinations in *Physaria* (Brassicaceae) from Western North America. *Novon* 17: 182-192.

Lesica, P. 1994. Vegetation map of the rare plant community types in the Pryor Mountains and Pryor Mountain Desert Carbon Co., Montana, unpublished report for BLM. Montana Natural Heritage Program, Helena, MT.

Lesica, P. and P. Achuff. 1992. Distribution of vascular plant species of special concern and limited distribution in the Pryor Mountain Desert, Carbon County, Montana, unpublished report for the Bureau of Land Management, Montana Natural Heritage Program, Helena, MT.

Regards,



Peter Lesica  
Conservation Chair



Gretchen Rupp  
President