

UNITED STATES DEPARTMENT OF THE INTERIOR
OFFICE OF HEARINGS AND APPEALS
INTERIOR BOARD OF LAND APPEALS

THE PRYORS COALITION; GALLATIN
YELLOWSTONE WILDERNESS
ALLIANCE; GREAT OLD BROADS FOR
WILDERNESS; and GALLATIN
WILDLIFE ASSOCIATION

Appellants.

Appeal of Pryor Mountain Travel
Management Plan, DOI BLM MT-CO10-
2019-00029-EA

IBLA DOCKET NO. 2021-286

Reply to BLM's Answer

On April 28, 2021 the Billings Field Office of BLM Released the Final Pryor Mountain Travel Management Plan (TMP), Environmental Assessment (EA) and Record of Decision (ROD). On June 17, 2021 the Pryors Coalition et al. (PC) filed a Statement of Reasons (SOR) for Appeal of the TMP, EA and ROD. On April 19, 2022 BLM filed its Answer to the PC's SOR. We now file a Reply to BLM's Answer.

According to the Code of Federal Regulations¹ *"The filing of a reply brief is discouraged. However, an appellant who wishes to file a reply brief may do so within 15 days after service of an answer under § 4.414."* However, despite the fact that the CFR discourages replies, there are issues in BLM's answer that justify, and even compel us to reply. In the interest of brevity, and because we have only a few days to reply, we did not attempt a comprehensive rebuttal. We address some particularly egregious issues, but partially honor the spirit of § 4.412 (d) by keeping our reply brief.

¹ 43 CFR § 4.412 (d)

A. Route Evaluations

BLM refers to their “route evaluations” repeatedly to construct arguments against our appeal (SOR). The following facts about the route evaluations show that those arguments are unconvincing.

1. BLM’s route evaluations were not publicly available at any time during the travel planning process.² The route evaluations were provided to us by BLM about August 23, 2021- *two months after* we submitted our appeal of the TMP. Therefore we had no opportunity to comment on them in our appeal, nor did we know they merited comment. BLM’s emphasis on this new (to us) information in their answer is justification for our reply.

2. The original route evaluations³ for about 145 route segments were prepared between July and November 2009 (with a few in 2010). At that time BLM was not considering designation of non-motorized (let alone non-mechanized) routes. That is demonstrated by the fact that the 2013 draft RMP included site-specific route designations in the Pryors - but *only for motorized* routes.⁴ (The June 2015 “*proposed* final RMP” proposed designation of a few non-motorized routes.⁵)

3. The route evaluation forms are check-box, and “yes” or “no” answer forms without commentary or discussion of the individual routes. The forms did not include check-boxes regarding non-motorized or non-mechanized designation. That fact is further evidence that BLM was not considering non-motorized designations when preparing those route evaluations. The route evaluations were not intended nor designed to evaluate routes for non-motorized or non-mechanized designation.

² BLM writes: “*The administrative record in its entirety has not been made publicly available at this time. Individual route evaluations were completed and are maintained within the Administrative Record. They were not made available to the public via ePlanning to prevent disclosure of locations of sensitive resources protected by law.*” (April 2021, Pryor Mountain TMP EA, Public Comment Summary at 5.). This seems an overblown concern since the check-box route evaluation forms only indicate that routes were “*In or Through or To*” or “*Proximate (within 300’) to a “CULTURAL/ARCH SITE.”*” The forms do not disclose the nature or location of any such sites.

³ Case record provided by BLM: File name “RMP Pryor ADMIN.Billings.RouteReports.09-21-10.pdf”

⁴ See legends of Maps 143, 144, 145, 146 of the travel management alternatives in the 2013 draft RMP. The 2013 draft RMP is not included in BLM’s case record, so we will attached these maps to the email submitting this Reply. One exception proves the rule. Alternative B includes designation of a single ½ mile non-motorized route. This is because that ½ mile two-track in Bear Canyon was violently and totally washed out in a spring 2011 flood.

⁵ Appendix O on Travel Management, June 2015 proposed final RMP.

4. The “updated” route evaluations⁶ are all dated 03/10/2021, *four months after* the 11/13/2020 updated draft TMP, and less than two months before the 4/28/2021 final TMP and ROD - which is largely identical to the 2020 draft. It seems that these updated evaluations are ex post facto justification for prior decisions, and cover for the use of 12 year-old route evaluations.

5. With a few exceptions, the “updated” 2021 route evaluations are identical to the 2009 evaluations (which did not evaluate non-motorized or non-mechanized designation)... except the various 2009 dates are all changed to “3/10/21,” and one additional name, J. Alexander, is added to the list of 2009 preparers. Alexander is the current Recreation Planner for the Billings Field Office. It is not clear how many, if any, of the 2009 preparers listed on the 2021 evaluations were involved in the “updates,” or how many are even still working in BLM’s Billings Field Office. We know that several are not. Four routes⁷ that had not been evaluated in 2009 were evaluated in 2021. None of the 9 to 11 names on the 2009 evaluations appear on these new evaluations, suggesting that none of them were involved in any of the updates.

6. Routes PM1145 (Rocky Juniper Trail) and PM1147 (Sykes Arch Trail)⁸ are among the few evaluated in 2021, but not in 2009. Examination of the evaluation forms for these two routes raises concern about the accuracy of all the route evaluation forms. Check-boxes identify “ATV” and “VEHICLE EXPLORING” among “Primary” “Public Use[s]” for these two routes. No one who had ever set foot on either route would check those boxes. And if they were carefully reviewing the forms would have corrected them. Both routes are incorrectly identified as “*Open in previous decision*” which would mean that they were open to all motor vehicles. But neither route has a foot-trail tread, let alone a two-track.⁹ At best they follow wildlife and feral horse trails. Probably neither has ever “seen” a wheeled vehicle. Neither route was even thought of in any “previous decision.”

Our concern here is not with these two particular routes. We are delighted that BLM is designating them as primitive (i.e. no constructed trail-bed) non-mechanized routes.¹⁰ They were

⁶ Case record provided by BLM: File name “Pryor Route Evals Final.pdf”.

⁷ PM1141, PM1143, PM1145, PM1147

⁸ Typographical errors misnumber these as PM145 and PM147 in the route evaluation forms..

⁹ An 0.3 mile segment (PM1008) of the approximately 3.5 mile Sykes Arch route follows an administrative two-track to be closed according to BLM’s Travel Plan map. (BLM’s case record ,file name: PryorMtns_TMP_ROD_Map.pdf.)

¹⁰ “*This [Sykes Arch] trail traverses NPS recommended wilderness and BLM WSA and would not be improved to the level that would allow equestrian passage. No mechanized use would be allowed.*” And “*The Sykes Arch trail would be managed solely*

both proposed by the Pryors Coalition and its supporters. The concern is that these route evaluations were apparently prepared and reviewed by people not intimately familiar with the routes.¹¹ There are other questionable checks on these and other route evaluations.¹² Often it seems that every route has nearly the same checks. Many boxes are identically checked (or not) for every route.

The more than 900 total pages of checked boxes in the 2009, and mostly identical, 2021 route evaluations, seem to be a strong paper record - perhaps intended to repel appeals. But a closer look, including the six points above, indicate that the evaluations, and claims based on them, are a very weak link in arguments against our appeal. Even if these reports are assumed accurate, reliable and up to date, they fail to address fundamental issues raised by BLM's stated purpose, need and goals for the TMP, and raised in our appeal. The thousands of checks (and "yes" or "no" answers), with no discussion or explanation, do little or nothing to address a basic question: *What route designation(s) - open motorized, non-mechanized, or closed - best implement the purpose, need and goals of the TMP?* The evaluation forms created, and mostly filled out in 2009, were not designed to address this 2019 - 2022 TMP question.

B. BLM is Incorrect

BLM asserts¹³ that we are incorrect in stating in our appeal SOR that Appendix O was deleted from the September 2015 Approved Final RMP. It is the assertion in BLM's Answer that is incorrect. They failed to distinguish between the June 2015 Proposed RMP, and the September 2015 Approved Final RMP. BLM cites and links to the June Proposed Final RMP, which does include Appendix O with site-specific Travel Management designations. There is a totally different Appendix O in the September Approved Final RMP titled "Visual Resource Management Program."

If correct BLM's assertion would have undercut the Pryors Coalition et al.'s credibility with the IBLA. This error in BLM's answer suggests that knowledgeable BLM staff were insufficiently

for hiking use. This trail was envisioned to be marked with signs or cairns and would not be constructed except for specific areas...." EA, Appendix E, page E-2

¹¹ We are confident that those of the five listed evaluation team members for these two routes with whom we are acquainted know better than these errors. Perhaps the problem is with the underfunding, and understaffing of BLM such that staff can't do everything they want to do, and must outsource work to out of state contractors. This situation can cause deficiencies in many planning efforts including this TMP.

¹² Due to our short two-week deadline and effort to keep this Reply brief, we cannot research and rebut all assertions in BLM's route evaluations and Answer that we find questionable. We note that BLM had ten months to prepare their Answer.

¹³ BLM's Answer, footnote 8, page 3.

involved in drafting, reviewing and fact checking BLM's Answer. Therefore skepticism is merited toward other assertions in BLM's Answer that may be incorrect or misleading.

C. Environmental Consequences of TMP: BLM's Answer includes Confusing Misrepresentation of Plaintiff's SOR

Pages 18 through 20 of BLM's Answer lack organizational headings, but from the middle of page 18 through the first of page 20, it appears to be a response to section H on Environmental Consequences in our Statement of Reasons (SOR) for appeal.¹⁴ We recommend a careful rereading of that section of our SOR.

This discussion is about BLM's analysis of the environmental consequences of the TMP on natural and cultural resources.¹⁵ Specifically it is about changes, between the No Action Alternative and the Proposed Action, in the miles of routes impacting various resources.

An example of the misrepresentation in BLM's Answer is:

"The Appellants also contend that a designation as Limited – Administrative and Authorized Users; Limited-non motorized and e-bike Class 1-3; or Limited-seasonal are really just an open "public route" designation."¹⁶

We "contend" no such thing(s), and BLM gives no citation in our SOR. We are not sure what "are really just" means.

We certainly don't contend that administrative designations "are really just an open 'public route' designation." In fact the primary motivation for our modified analysis of Environmental Consequences is that BLM did *not* distinguish between public open, and administrative routes in their analysis. We did, for the reasons explained in our SOR¹⁷: Administrative routes get much less use than public routes. And the administrative routes to be "closed" in the proposed action get even less use. Therefore their "closure" will have small environmental consequence (compared to open public routes). BLM's lumping of administrative routes and public open routes together distorts the analysis.¹⁸ Analyzing public routes separately gives a more informative result.

¹⁴ SOR, page 8-10

¹⁵ TMP/EA, section 3.1.2, pages 3-5 to 3-15

¹⁶ BLM's Answer, p 19

¹⁷ SOR, section H. 1. a. page 9

¹⁸ Including little used or unused administrative routes in the no action side of the comparison, and then excluding those to be closed from the proposed action side makes it appear that environmental impacts have been reduced when they have not, or have been only slightly reduced (compared to open public routes). Combining both public routes and administrative routes in the same comparison allows small reductions in impacts of closed administrative routes to cancel out larger environmental impacts of public routes. That is why we analyze public routes separately.

As explained in our SOR,¹⁹ we did include 6.2 miles of seasonally closed routes²⁰, and 2.6 miles of limited width designated route with “open” routes in our analysis of environmental consequences. This is because the seasonal routes are fully open ten months of the year (83%), and seasonally closed for only 2 months. And the “limited width” route has no designated width limit in the proposed action. It’s use will not change between the no action and proposed action. These 8.8 miles of routes are included in the no-action side of the comparison. Excluding them from the proposed action side, even though their environmental impact is essentially unchanged, makes it look like there is a reduction in environmental impacts when there is not. Including the 8.8 miles on both sides is the honest way to analyze the environmental impacts of the proposed action.²¹

BLM’s Answer claims:

*“[Appellants] present information that lumps both open routes and other limited designations together to create **their own data tables**, in which they base their allegations of flawed analysis. This disagreement stems from the fact that the appellants are now lumping “all public routes” together, rather than distinguishing between those that are open to all motorized uses and those that are limited to a number of uses, such as season, non-motorized uses (including e-bikes), and **administrative**, etc. **Yet at the same time, Appellants contend that open routes should be treated differently than those limited to certain uses (e.g. administrative).**”²² (Underline and bold emphasis added.)*

The single data table we prepared uses BLM’s own data. We did include a few “limited” routes as explained above. We did not “lump” in administrative routes as BLM claims. It was BLM’s analysis that “lumped” the open and administrative routes together. Despite BLM’s implication in the final sentence, our analysis was consistent.

D. The Proposed TMP does not satisfy BLM’s stated Purpose, Need and Goals

BLM argues that, since we did not cite any legally required ratio of open motorized vs. non-mechanized route designations, or specific mileage goals in the purpose and need, then we have not demonstrated that the TMP fails to satisfy the stated purpose, need and goals of the action. We are not aware of any such numerical standards, but words have meaning without the need for numbers.

¹⁹ SOR, section H. 1. b. page 9

²⁰ Apparently BLM thought we were objecting to seasonal closures and inserted a justification for seasonal closures. If anything we might recommend more and longer seasonal closures.

²¹ We also included e-bike routes because, despite contrary claims, they are motor vehicles more powerful than professional cyclists. It could be argued that non-mechanized trails should be included in this analysis too since hikers and equestrians also have environmental impacts.

²² BLM’s Answer, page 19

The absence of numerical standards allows BLM planners more discretion, but does not allow unlimited discretion.

We think most people would agree that the mere handful of, mostly short, designated non-mechanized routes does not satisfy the common language meaning of BLM's own words in the stated purpose, need and goals, or in BLM's claims about the final TMP. A few quotes from BLM (underlines added):

"The purpose of the action is to provide a logical and sustainable travel and transportation network that addresses the diversity of access and recreational needs of the public..." (EA 1-1)

"BLM proposes to design and implement a trail system incorporating existing routes that would focus on a balance of motorized and non-motorized use..." (EA 2-8)

"Specifically, desired future conditions include: "A wide variety of trail-based recreational opportunities (e.g., hiking, ... horseback riding) in a manner that reduces existing user conflicts." (TMP page 11)

"While the TMP objectives for the Pryor Mountains prioritize conservation, the proposed travel network also provides enhanced recreation opportunities for the public and provides a balance between motorized and non-motorized uses. (EA 2-7)

Furthermore the addition of non-mechanized and non-motorized trails will provide enhanced opportunities for public recreation. (BLM's Answer 8)

Is there any degree of difference between the extensive network of interconnecting motorized routes, and the few scattered non-mechanized routes, that BLM would consider incompatible with BLM's own language? Do BLM's words mean anything?

The TMP provides no *network* of non-mechanized routes, only a scattered handful of short trails and certainly no *wide variety*. No numerical standard is needed to understand that there is no *balance* between motorized and non-mechanized trails when the discrepancy is this large with Approximately 120 miles of open motorized routes vs. 11 miles of non-mechanized routes.

BLM has invented a new standard: the TMP "*provides enhanced opportunities*" for non-mechanized and non-motorized recreation. Technically the new TMP meets this standard, since there are absolutely *no* designated non-motorized or non-mechanized routes in the no action alternative.²³ But that is the lowest possible bar for a standard. BLM's words cited above surely mean more than that.²⁴

²³ Similarly the TMP meets BLM's "*reduces existing user conflicts*," another lowest possible bar.

²⁴ This low-bar standard suggests that BLM minimizes the importance to the public of low speed, low commotion foot-trails (i.e. non-mechanized trails). We are concerned that this attitude may lead to lax implementation and enforcement of non-mechanized routes. The Pygmy Panther Trail constitutes a quarter of the mere eleven miles designated as non-

E. Specific Routes

BLM's answer addresses several specific route designations primarily by repeating the explanations given previously by BLM in the EA. We discussed the inadequacy of those explanations in our SOR and will not repeat those comments here in detail.

A synopsis of our response to BLM's explanations: *The route goes somewhere interesting*, is less than compelling as a reason for designating it open for motorized use. Might hikers like to go to interesting places? *Hikers might impact soils and vegetation on a naturally restoring route*, is quite puzzling as a reason for not designating a non-mechanized route when the route is used with wheeled vehicles by administrators and permittees. Blaming hikers for illegal trespass by motorized scofflaws is a poor argument for not designating a non-mechanized route. When there are more than a hundred miles of open motorized routes, and barely a handful of designated non-mechanized routes, it is disingenuous to claim that hikers will have a better experience when they don't go hiking on trails they don't know about because BLM won't tell them about trails that get away from the motorized commotion.

See our SOR for a more complete discussion of these points.

F. Route Evaluations: Examples

BLM's answer includes several glowing descriptions of BLM's route evaluations that make it appear that the evaluation process and resulting designations are beyond reproach.²⁵

For example:

"The route evaluations were conducted by a contractor and the Bureau of Land Management in 2009 and updated in 2020 by BLM, utilizing on the ground field evaluations, public comment, and GIS applications. The proposed route designations were based on a thorough route evaluation process that was conducted by an interdisciplinary team (IDT) of resource specialists, and public input provided through multiple public comment periods. The route evaluations considered recreation opportunities (e.g. motorized, non-motorized, and non-mechanized), needs for administrative access (e.g. livestock management), and potential for conflicts with natural and cultural resources. Based on this information collected for each route, the IDT considered each route individually and as a network. The proposed designations provide for a range of recreation

mechanized in the TMP. Thus we were distressed to find, exactly one year after the new TMP was signed, a newly signed Pygmy Peak Trailhead identifying it as open to mountain bikes. This route has never been designated for mountain bike use - either before or after the new TMP. So this is not an old sign that predates the new TMP. (Previously the route was designated for administrative use only. The sign is not in a 9/18/2018 photo.) BiFO says this sign will be corrected promptly, but the fact this mistake happened suggests that IDT and others in the BiFO do not have the unified and well informed understanding of route evaluations and designation that is reported in BLM's Answer.

²⁵ Section A above challenges several of BLMS assertions in the following quote.

opportunities while minimizing potential impacts to resources. Moreover, the route evaluation forms were updated as part of this process.”²⁶

We are certain that good people worked on the TMP and EA, but they also have numerous other management responsibilities in the Billings Field Office area, which is much larger than the Pryors. It is impossible for limited BiFO staff to have detailed information on all the areas they are responsible for. The first line of the above quote, referring to an outside contractor, indicates that BLM is understaffed for the many tasks required. The contractor for this TMP is based in Arizona. They certainly have limited on-the-ground experience in the Pryors.

Two Examples: Demijohn Flat PM1021 & PM 1022

As examples of the many route evaluations, we look more closely at the evaluation of two specific routes. We pick PM1021 and PM1022 because:

- We have been proposing these routes for non-motorized or non-mechanized designation at least since a June 2013 comment letter from the Pryors Coalition (PC) to BLM.
- BLM received numerous letters from PC supporters requesting such a designation in the 2015 TMP.²⁷
- These routes (8.2 miles including PM1019, PM1021, & PM1022) were proposed by BLM for designation as non-motorized in the 2015 proposed final RMP.²⁸
- These two routes (PM1021, & PM1022) were again proposed by BLM for non-motorized designation in the October 2019 draft TMP.²⁹
- BLM dropped the non-motorized designation for these routes in the updated 2020 draft, and final 2021 TMPs for reasons that, frankly, do not make any sense to us.³⁰

So these two routes have been actively “in play” for years. What do the 2009 and 2021 route evaluations forms for these two routes tell us?³¹

The only differences between the 2009 and 2021 forms are: the date is changed from 07/31/2009 to 03/10/2021; the name J. Alexander is added to the list of 2009 Team Members (who we have no reason to believe were involved in the 2021 “update”³²); and the mileage numbers are changed.

²⁶ BLM’s Answer, pages 6 & 7.

²⁷ Search for “demijohn” in Volume 3 of the 2015 proposed final RMP.

²⁸ Table O-2 in Appendix O, pages o-9 & O-10.

²⁹ 2019 draft TMP/EA, Figure 2-3. Proposed Action, page 2-7; and Demijohn Loop Extension Route, page 2-6

³⁰ SOR page 3 & 4

³¹ For convenience 2009 and 2021 route evaluations forms for PM1021, & PM1022 will be submitted with this reply.

³² See section A 5 above

There has been no meaningful updating of the forms. Even after 8 years of public requests that PM 11021 be designated as a non-motorized hiking trail, hiking is not listed as a public use of the route.³³ There is no indication on the evaluation forms that these routes were ever considered for non-motorized designation. The evaluation forms provide no explanation of why the routes were designated as non-motorized in 2015 and 2019, or why they were then undesignated in 2020. All we see is a bunch of checked boxes - unchanged between 2009 and 2021. What check boxes, if any, informed the changing BLM designations?

BLM States:

“BLM would consider any future proposals for non-motorized trails on and off administrative routes. If new trails were established thru subsequent NEPA process they would be added to public maps.”³⁴

Why not do this now in this Appeal process? These routes have been continuously proposed and NEPA evaluated for 9 years.

Another Example: Bent Springs Trail (PM1132)

The Pryors Coalition, and others, requested that Bent Springs Trail (PM1132) along with PM1134 be designated as non-mechanized routes to make a needed hiking loop. BLM writes regarding Bent Springs Trail:

“In March 2021, in response to public comments received on this route, to include comments from the Appellants, BLM updated the route evaluation and determined that this route should continue to be designated as open.”³⁵

We just get a declaratory “BLM determined....” According to the route evaluation form, only J. Alexander was involved in the update - other than the 2009 team. In December 6, 2019 comments on the November 14, 2019 draft TMP the PC, and others, requested non-mechanized designation for Bent Springs Trail. Apparently BLM did not update the route evaluation in preparation for the November 13, 2020 updated draft TMP. According to BLM’s answer (quoted above) and the date on the 2021 evaluation form, BLM did not update the route evaluation until March 2021, four months after the 2020 updated draft TMP was released - and only six weeks before the Final TMP and ROD was released. More than one hundred evaluation forms were “updated” on March 10, 2021.³⁶

³³ The 2009 form for route PM2021 indicates, under “Special Resources” that the route is “In proposed ACEC expansion. The 2021 report still indicates the “proposed” expansion, despite the fact that the 2015 RMP designated the East Pryor ACEC to include the route. Apparently knowledgeable BLM staff have not had time to review these forms carefully.

³⁴ Balanced Use: Appendix E - Public Comment Summary, page 3,4, EA page 135,6. Also see SOR page 4, section C. 1. e.

³⁵ BLM’s Answer page 12

³⁶ The 2009 forms were not all the same day. PM1132 was 06/25/2009, PM1021 and PM1022 were 07/31/2009.

BLM was not considering non-motorized designation when the 2009 forms were prepared.³⁷ The 2009 and the “updated”(?) 2021 evaluation forms for Bent Springs Trail are identical.³⁸ There is no indication that the route was reevaluated in the new context of a TMP proposed to address the public need for non-mechanized routes. There is no indication that this was one of the few specific routes requested by the non-mechanized public. The form only indicates “hiking” as a “secondary” public use of the route. No explanation is given for why this route was not suitable for non-mechanized designation.

These examples do not support BLM’s claim that route designations were well founded on thorough route evaluations.

G. An Appeal is not Litigation

BLM’s Answer suggests that if we don’t indicate specific regulations and/or case law that legally require BLM to make changes to the TMP, then we are merely dissatisfied with the Decision, and expressing a difference of opinion.

There is considerable intermediate ground between these two extremes. An appeal is not litigation. We are not attorneys. Our hope was that the appeal would provide an opportunity for a higher level in the DOI to take another look at the TMP Decision, and consider whether some adjustments might improve management of the landscape and/or provide better opportunities for the public.

Yes, we are dissatisfied with the decision, otherwise we would not be appealing it. But that doesn’t mean it is just a difference of opinion. We have presented facts calling into question BLM’s analysis and failure to satisfy the common language meaning of BLM’s purpose, need, and goals. The fact that many members and supporters of our organizations are dissatisfied suggests that the TMP does not *address the diversity of recreational needs of the public nor minimize conflicts between off-road vehicle use and non-mechanized use* as required by the purpose and need, and E.O. 11644.

Not long ago some of us participated in an appeal of a USFS Forest Management Plan. The process did not have the aura of faux-litigation. Most of the debate was about the merit of various possible decisions in the FMP - not legal technicalities. We were not fully satisfied with the process or results of the appeal, but the FS did make some modifications to the FMP as a result of the appeal.

We urge BLM and the IBLA to consider the appeal as an opportunity for possible improvement of land management rather than as practice litigation.

³⁷ See section A 2 above.

³⁸ For convenience the 2009 and 2021 route evaluations forms for PM1132 will be submitted with this reply.

Respectfully submitted this 3rd day of May, 2022

/s/ Dick Walton

Dick Walton

For the Appellants

CERTIFICATE OF SERVICE

On May 2, 2021, I emailed this document to the following:

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