Public Comment Summary 2011 Upland Game Bird Enhancement Program Draft Strategic Plan June 20, 2011

Introduction

FWP received comments on the UGBEP Draft Strategic Plan via the website (Survey Monkey), email, hard copy mailings, and at public meetings held in all seven Regional Headquarters and Helena Headquarters on May 18, 2011. The formal comment period was functionally initiated April 14, 2011 with that day's FWP Commission process and adoptions. An "interested person" letter generally describing the proposed draft UGBEP Strategic Plan was posted on the website and mailed to an established list of interested parties. Electronic copies of the plan were available on the FWP web site. Hard copies were available at the public meetings and were also distributed upon request.

In all, 53 comment entries were received through the deadline of 5:00 PM, June 06, 2011: 19 comment entries were received electronically via the Survey Monkey web interface; 10 written/email comments from the general public; and 24 comments received during the Regional public meetings. All comments were from Montana addresses and included unique inputs as well as common or repeating messages referencing the local, regional, and/or statewide scale of circumstances, management, or advocacy.

This summary report represents an effort to enumerate rationales and values that *repeatedly* surfaced in public comment, listed here in no specific defined order, and as they pertained specifically to the UGBEP Draft Strategic Plan. Moreover, this document is not a tabulation of supporting vs. opposing comment numbers (both support and opposition were represented across the total comment set). As such a coarse summary, it is not intended to replace, dismiss, or represent all/any comments received and forwarded to the Commission and FWP staff. Rather, this summary has been assembled only to assist all parties generally recognize and consider relatively consistent elements of public comment so that those elements at least (along with any others) may be better considered in light of proposal justifications.

Specific Topics and Themes with Council's Response (bold)

Consistent Themes

 Eliminate supplemental feeding because of costs and lack of long-term effectiveness

Supplemental feeding is addressed by statute and ARM Rule. Council holds their position to limit emergency supplemental feeding to Sheridan, Roosevelt, and Daniels counties.

 Eliminate pheasant releases because of costs and lack of long-term effectiveness

Funding pheasant releases is a statutory requirement. In the draft plan and located under the section, "Council Recommendations for Future Consideration," the Council states: While recognizing social and economic values, it is the recommendation of this Council to gradually eliminate investment in pheasant releases and transfer those funds to habitat enhancement. Three members of the Council opposed this motion, which received majority support.

- Support the conservation of Russian olive trees on upland sites
 In the draft plan and under the section, "Council Recommendations for Future Consideration," the Council states: Council recognizes the value of Russian olive as an effective source of food and woody cover outside riparian areas and subirrigated habitats. The Council further encourages FWP to conserve Russian olive on strategically located dryland sites for food and winter cover.
- Focus/emphasis on habitat enhancement efforts rather than bird releases
 In the draft Strategic Plan, the Council listed habitat enhancement efforts
 as a guiding principle in program implementation but acknowledges that pheasant releases are a statutory requirement.
- Support for proposed funding allocations for pheasant releases, turkey transplants, and supplemental feeding (to include those counties identified in the plan).

Council holds their position on funding allocations.

- Emphasis should be on public lands; seek interagency partnerships on publically controlled lands; improve communication and cooperation with DNRC.
 Currently, ARM 12.9.703(3) emphasizes program implementation on private lands. Council holds on their position to have equal emphasis on private and public lands.
- Hunting access: need assurances that opportunities are unbiased and equal
 The contract language addresses the requirement for opportunities that are "unbiased and equal" for all hunters. Council also advises the department to assess access through discussions with Cooperators during scheduled monitoring.
- Reconsider \$200,000 cap could limit opportunity on future enhancement efforts on public lands
 - Council held additional discussion on this subject and revisited "project" definition. When specific activities are done annually to <u>maintain</u> the project, Council advises that these maintenance activities should not be included in the ARM definition of "project." Council advises FWP to develop program language that distinguishes project and maintenance definitions.
- Program focus should be on Block Management areas.
 Access strategies include an emphasis for UGBEP projects on lands enrolled in Block Management (page 97).
- Predator control/management should be incorporated into the strategic plan.
 Strategies for predator control or management will not be identified in the UGBEP strategic plan. This plan is primarily habitat-focused. Productive and effective habitat will reduce the need for predator control.

Other Comments

- Record contracts for long-term, higher dollar amounts, not for short term, lowerbudget contracts; recording projects greater than 1 year on deeds may be a "red flag" to potential landowners.
 - Council holds their position on recording contracts. In the future, the Council will re-evaluate <u>all</u> aspects of the Strategic Plan, to include recording contracts.

- Include a map of Montana with regional boundaries defined
 A map will be developed that clearly identifies regional boundaries that will also show regional headquarters.
- Streamline the application process for habitat projects
 Council has recognized the need to efficiently implement the UGBEP while maintaining a high degree of accountability.
- Focus on clustering project vs. "scattering" projects across the landscape
 Focus areas are identified in the regional strategic plans.
- Inventory publically managed lands to determine potential enhancement efforts
 Inventorying publically managed lands is not within the scope of this strategic plan.
- Pursue fee-title purchase/easement acquisition on quality habitats that provide access in perpetuity.
 - Fee title lands cannot be purchased with UGBEP dollars as per statute.
- Region 4: Plan should account for the likely reduction of CRP; establish greater communication between Block Management program and UGBEP; plan did not cover dryland farming/agricultural habitats
 Region 4 is aware of these comments.
- Funding allocation high fixed costs (pheasant releases and UGB Biologists' salaries) prevent more money from "hitting the ground."
 The UGB Biologists are essential for program implementation as demonstrated by the increase in quality projects hitting the ground since the biologists were hired.
- Too much emphasis on nonnative pheasants not enough on native mountain grouse
 - Council understands and also acknowledges that other criticisms state that there is not enough emphasis on pheasants.
- Program emphasis should focus on CRP enrollment and renovation activities
 Recent program activity addresses seed cost-shares for high value CRP mixes. Council acknowledges the importance of CRP renovation.

o Need an UGBH biologist stationed in Lewistown

One UGB Habitat biologist is already stationed in Conrad, and it would be difficult to justify an additional UGB biologist position when other regions may warrant such a position.

 Plan should proposed an "upper limit" on % dollars spent on administering the program

Revenue and expenditures will be reviewed by the Council annually. Council supports the current positions administering the UGBEP.

 Plan should consider how to improve grazing management on public lands, to include leasing inexpensive grazing leases

Plan emphasizes the need to leverage dollars with other agency programs to fund grazing systems. Leasing inexpensive grazing leases is not within the scope of the UGBEP.

o Plan should promote youth hunting opportunities

All hunter license dollars fund the UGBEP. Council does support youth hunting activities but encourages equality for all hunters who hunt on UGBEP projects. Pheasant regulations do provide an early season for youth.

- Support for performance measures
 Council holds their position.
- Monitoring should take into account bird populations, bird indices, harvest success – FWP should partner with Universities and other groups to get meaningful information.

FWP staff currently conduct these activities.

- Plan should address how to improve Hungarian partridge habitat
 Hungarian partridge habitat is regional and addressed in the regional plans as warranted.
- Land managers should consider reintroduction of sharp-tailed grouse in Regions 1 and 2.

See regional plans.

Identify and establish relationships with organic farming and ranching operations
 Partnerships are encouraged for all who are eligible to participate in the
 UGBEP.

 Several comments submitted on ARM – abolish or modify pheasant ratio, release dates.

In terms of the above comment, ARM will be left as is.

 Recommendation to supplemental feed in 3 counties not supported – FWP should use the US Weather Service and US Dept. of Ag data to determine the need to supplemental feed state-wide.

Council maintains their position to focus feeding efforts in Sheridan, Daniels, and Roosevelt counties.

 Supplemental feeding should be a line item and moved over to the remaining 85% of the funds.

As stated in ARM, supplemental feeding is an "activity related to pheasant releases," and will remain under the Upland Game Bird Release Program ARM.

 Regarding Billings-area enhancement efforts – disagree with the monetary limits set on enhancement projects. Ongoing efforts on public lands are likely the only opportunity for Region 5.

Council has re-evaluated this situation and has made new recommendations to FWP to define maintenance activities, which will not be restricted under the funding cap for "projects."

- Continue efforts with private landowners they are key to habitat conservation.
 Council agrees with the statement.
- Birds need to go on WMA and other public lands.
 Pheasant releases on private lands open up those lands to public access.
 Council maintains their position.
- Coordinate with federal agencies to decimate Russian olive trees
 As stated in the above section, Council maintains their position and recognizes the value of Russian olive as an effective source of food and woody cover outside riparian areas and subirrigated habitats.
- o Should not with partner Block Management projects double-compensates the landowner

Landowners may participate concurrently in the UGBEP and Block Management program as defined by statute (87-1-249(2)(b)).

- Include "pollinator strips" in brood strips section of the plan.
 "Pollinator strips" will be added to the plan.
- Region 3 need to state how program implementation is done. PF Chapter?
 Intern?

Program oversight in future years will provide updates to the Region 3 plan.

- Region 6: need to state that the pheasant release program is not working as the legislature has intended.
 - Council acknowledges that the pheasant release program is a statutory requirement that provides additional access acres and is also an important socio-economic in several areas of Montana.
- Nesting cover address need to rejuvenate stand at least one time (year 6) during the contract period (no more than half in one time period)
 Ground disturbing activities are incorporated in program implementation as needed.
- Provide no-till drills for private landowners
 May be considered for future considerations. Council advises FWP to identify those counties who may already have drills available for UGBHEP projects.
- Update sage-grouse core area map to include area 18-miles north of Malta; update turkey distribution map to include west of Malta; include BLM description (p. 66) and identify Pheasants Unlimited (p.70), and consider adding Weigand and Janson's book on pheasants to literature cited section.
 Strategic plan was not soliciting comments on UGB distributions and refers these comments to Region 6. Referencing specific BLM program descriptions (e.g., Sike's Act) is not warranted at this section of the plan. Identifying BLM is appropriate.
- Habitat contracts should be for a longer period of time.
 The strategic plan identifies habitat contract length as a mechanism to negotiate contracts, to include longer contract terms.
- Community should be behind the program for economic benefits
 Council supports this statement.

- \$2.00 per resident ugb license is "embarrassingly" low for program contribution.
 An increase in funds from license dollars will likely not occur until the fund balance is reduced.
- Plan needs to address the adverse impacts of burning big sagebrush
 Council acknowledges that impacts/conversions to all habitat community
 types could have potentially adverse effects to native upland game birds –
 examples include burning sagebrush-grassland communities or
 conversion of native soils.
- Contracts should have shorter terms for greater landowner buy in ~ suggest 5 years

The overall habitat benefits to upland game birds are often not realized until after 3 or more years, depending on weather conditions. Shelterbelt establishments may take 10 years or more to have realized benefits to upland game birds. Council maintains their position.