



## **Montana Fish, Wildlife & Parks**

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**DECISION NOTICE for the Draft Environmental Assessment:  
Seven Sisters WMA Agricultural Lease  
Region 7 Headquarters  
PO Box 1630, Miles City, MT 59301  
(406) 234-0900**

**DESCRIPTION OF PROPOSED ACTION:**

Seven Sisters WMA was purchased by Montana Fish, Wildlife & Parks (MFWP) to maintain a woodland/cropland complex to benefit a diversity of wildlife while maximizing hunting opportunities, primarily for white-tailed deer and pheasants. The proposed action is to continue a sharecrop agreement on 122 ac of the WMA with a long-time, competent lessee and to initiate a sharecrop agreement on 201 ac of the WMA that were purchased in December 2012. For both leases, lessees will cultivate and retain a portion of the hay/grain crop harvest, leaving the remaining crop standing for wildlife use during winter months.

The benefit and purpose of both leases is to provide winter habitat and forage, primarily for wintering pheasants, deer, and turkeys. The WMA annually winters an average 250 white-tailed deer. Standing crops also benefit migrating waterfowl and a variety of other wildlife species. The area is open to public hunting during all commission-approved seasons, and provides opportunity for deer, upland game bird, and waterfowl hunting.

The WMA has been under an agricultural lease with the same lessee since 2004, and the new acquisition has been leased by the same individual. The lessee has shown initiative on both the previously-leased WMA and the new acquisition to utilize farming practices that increase the productivity of the land. These include fertilizing and conditioning the soil, treating of noxious weeds, and maintaining fields in good condition. The lessee has fulfilled all conditions of previous leases entered into with MFWP.

**ALTERNATIVE TO PROPOSED ACTION:**

**Alternative A: No Action:**

Agricultural lease will not be renewed and agricultural lands will not be cultivated. This alternative would require MFWP to commit resources to manage weeds on the previously cultivated 323 acres of farm fields. Wildlife would be negatively impacted by lack of wintering habitat and food resources.

**Alternative B: Proposed Action:**

Agricultural lease will be renewed for 122 ac of cropland and a new agricultural lease will be initiated for 201 acres of cropland purchased in December 2012. Wildlife will benefit because

high-quality wintering habitat and forage will be available. The lessee(s), MFWP and sportsmen will mutually benefit through the sharecrop agreement.

#### PUBLIC REVIEW PROCESS:

FWP is required by the Montana Environmental Policy Act (MEPA) to assess potential impacts of its proposed actions to the human and physical environments, evaluate those impacts through an interdisciplinary approach, including public input, and make a decision based on this information. FWP released a draft environmental assessment (EA) for public review of this proposal (Seven Sisters Wildlife Management Area Agricultural Lease) on February 1, 2013 and accepted public comment until 5:00 P. M. on February 22, 2013.

Legal notice of the proposal and availability of the Draft EA was published in the *Glendive Ranger Review* and the *Sidney Herald*. Copies of the environmental assessment were distributed to neighboring landowners and interested individuals, groups, and agencies to ensure their knowledge of the proposed project. The EA was available for public review on FWP's web site (<http://fwp.mt.gov/>, "Recent Public Notices" and "Submit Public Comments") from February 1, 2013 through February 22, 2013. An FWP statewide news release was issued January 30, 2012 and posted on FWP's website (<http://fwp.mt.gov/>, "News Releases") the same day.

#### SUMMARY OF PUBLIC COMMENT

FWP received 3 total comments representing 1 person and 1 group. The Gallatin Wildlife Association (Bozeman, Montana) submitted 2 comments. One comment was opposed to the proposed action and two comments requested clarification of the intent and justification for the proposed project but did not state support or opposition for the project. Comments can be viewed in their entirety in Appendix A.

#### RESPONSE TO PUBLIC COMMENT

Below is a summary of comments and FWP responses. Similar comments are grouped together (Comment numbers correspond to the numbering of the individual commenters and paragraphs in Appendix A).

##### Comment #1b:

1. There are no references to any scientific literature indicating positive or negative effects of agricultural food plots, artificial nesting cover, or rest-rotation grazing on white-tailed deer, ring necked pheasants or wild turkey.

##### Comment #1j:

4. Note that, since cropped lands are shared with 25% of the crop unharvested, the unharvested acres will have to be 4 times as valuable (on a per-acre basis) as unmanipulated land before the sharecropping begins to be justified. Admittedly, this is an oversimplification and assumes that the harvested acres have zero value for a selected wildlife function, such as winter food for white-tailed deer. However, the concept is justified and must be considered in evaluating the costs and benefits of the project and in comparing alternatives.

5. Likewise, the value of unharvested irrigated hay would have to be 2.8 times greater than unmanipulated land before the project begins to be justified.

6. Note that, in a given year, the wildlife value of a newly plowed and planted field may be almost zero; in exchange for 25% of the field being wildlife-useful for part of the year.

Comment #2b:

So I propose No Action – do not renew or initiate any crop/haying and please manage for wildlife, not manage for ag/livestock.

*FWP Response: It has been well-documented in the scientific literature that agricultural food plots can be beneficial and even critical for overwinter survival, body condition, and reproduction in a variety of wildlife species (deer, upland game birds, waterfowl, etc.). This is particularly true during extreme winters, when overwinter mortality of wildlife can devastate wildlife populations in Montana. Wildlife commonly forage in both harvested and unharvested agricultural fields during fall and winter—the commenter is incorrect in his assumption that harvested fields have little wildlife value. Harvested fields provide little cover but valuable foraging areas. Alfalfa fields comprise a small portion of the WMA (<5%) and provide valuable brood-rearing habitat, wildlife forage, and soil benefits. Agricultural crops and hayfields are beneficial to favored game species when adequate cover for fawning, nesting, brood rearing, and overwinter survival are abundant. A broader picture of landscape-level habitat is beyond the scope of this EA, which specifically addresses an agricultural lease on a small portion of the WMA. However, the mosaic of cropland, woodlands, shrublands, and grasslands present on the WMA provide ideal habitat for white-tailed deer, pheasants, and turkeys. Although upland game birds will nest in agricultural fields, abundant nesting cover is available on the WMA and nesting cover is not limiting to local upland game bird populations. Rather, winter severity and overwinter survival generally have the greatest impact on upland game bird populations in eastern Montana. An exhaustive literature search and citation are unnecessary for well-documented and ground-proven wildlife management principles and practices. Rest-rotation grazing is beyond the scope of this EA.*

Comment #1c:

2. Despite years of experience with agricultural share-cropping on WMAs (9 years on 7 Sisters, 12 years on Elk Island) no local wildlife data are presented for evaluating the effectiveness of this management technique for any of the three primary wildlife species.

3. There apparently are no plans for evaluating the effectiveness of renewed or new agriculture or grazing activities on any population characteristics of any of the primary wildlife species. When public resources are being committed, we believe management goals should be precisely stated and goal-achievement should be measured. This is necessary for real adaptive management. It is necessary to demonstrate value in the use of public resources.

*FWP Response: The area wildlife biologist annually surveys the WMA for white-tailed deer and pheasants as part of larger trend area surveys for both species. Whitetails and pheasants are abundant on the WMA, with densities similar to or exceeding densities in surrounding areas (based on communication with past and present area biologists). The*

*WMA annually receives significant hunting pressure yet hunter success rates are high (based on communication with sportsmen). The intent of the WMA is not to conduct research, rather to implement science-based practices to manage wildlife populations for the benefit of sportsmen. Rigorous research and data collection as suggested by the commenter would be extremely costly, unnecessary to achieve management goals, and would require landscape-level analyses that are beyond the scope of this EA, which specifically addresses an agricultural lease on a small portion of the WMA.*

Comment #1d:

4. Populations of the three primary wildlife species are complexly limited. That is, limiting factors vary greatly in space and time. However, there is very little or no discussion of habitat limitations for the three wildlife species in the project area. It seems that some habitats being created or maintained by leases on the WMAs are abundant on adjacent or nearby private lands. Will duplication of these habitats provide habitat that is limiting? Might other needed habitat types be scarcer on the area landscape? All four EAs provide broad, unsubstantiated statements regarding the values of the projects to the three primary wildlife species and to many species of “other wildlife”. More precise discussion of this issue is warranted. If it cannot be provided, the need for on-the-ground evaluation of these projects is emphasized.

*FWP Response: A broader picture of landscape-level habitat and spatiotemporal habitat needs of wildlife is beyond the scope of this EA, which specifically addresses an agricultural lease on a small portion of the WMA.*

Comment #1e:

5. Financial costs of alternatives are vague. Our experience is that these costs are often understated for managing private activities on our WMAs. Expected costs for weed control under the no-action alternative are not given. Personnel costs for managing and administering the projects are not provided. Costs of owning and maintaining irrigation equipment, (at least on Isaac Homestead WMA) fences and water use are not provided.

Comment #1f:

6. The alternative of converting these lands to natural vegetation is not explored or analyzed. There is no description of what natural vegetative succession, or wildlife benefits, will occur if any of these projects are not applied to our WMAs. The only implication given is that there will be “weeds”. This seems to be largely a simplification of natural succession used to justify the projects.

Comment #11:

Please consider the above comments in evaluating the Seven Sisters agricultural lease. Since WMAs are relatively rare on the landscape, we must maximize their value in achieving our wildlife goals. Moreover, public funds and other resources should be used as efficiently and effectively as possible. We are under no illusion that this is a simple request.

*FWP Response: Weed control costs would depend on the extent and nature of infestations, and are therefore impossible to accurately calculate. The cost of herbicide plus equipment could easily exceed \$50/ac or >\$16,000 if the entire 322 acres needed treatment. Multiple*

*treatments would likely be necessary to control noxious weeds before vegetation reestablished, and is unlikely to result in high-quality wildlife habitat. Converting lands to natural vegetation through “natural” succession would likely result in a near-monoculture of exotic smooth brome grass, based on “natural” vegetation surrounding areas. Noxious weeds would indeed be an issue and weed control would be necessary (leafy spurge and Canada thistle are two weed species that are common in the area). Few wildlife benefits will result from the no action alternative—smooth brome has little value for upland game bird nesting habitat or whitetail forage. Monotypic stands lack diversity, and without robust forb and insect components grasslands generally decrease in wildlife value. Long-term plans for the proposed lease area do call for conversion of some areas to dense nesting cover while maintaining some land in agricultural production to provide winter food for wildlife. Stands of dense nesting cover also require management to prevent encroachment of smooth brome and other weeds. The proposed agricultural lease is the preferred alternative because it will provide critical winter food and cover for wildlife. Conducting management activities through the proposed sharecropping agreement is a fiscally conservative method of accomplishing wildlife goals. The lessee owns and operates all equipment and is responsible for weed control within the leased areas. Implementing habitat projects and planting food plots without the use of a sharecropper was not considered because it would be extremely costly, would require additional personnel, and would not be justified since both harvested and unharvested cropland areas provide wildlife benefits. Personnel costs would be similar under the no-action and preferred alternative—the area biologist would be required to determine management plans and monitor the area equally under each alternative. FWP does not maintain or own irrigation equipment (all fields are flood irrigated) or fences on the WMA. Costs for irrigation water are set and required to be paid to the Lower Yellowstone Irrigation District regardless of water use (i.e., even if no water is used, the assessed fee must be paid).*

Comment #1g:

1. What is the basis for: “brome grass provides minimal wildlife benefit”? Are there local data or literature comparing uses of brome grass by white-tailed deer, turkeys and especially by nesting pheasants to their uses of alfalfa or other “small grain” crops?

*FWP Response: Below are three citations regarding smooth brome grass and wildlife. An exhaustive literature search on the effects of smooth brome on wildlife is beyond the scope of this EA.*

*“Why is having brome BAD? Brome forms a thick matt of grass at ground level making it difficult for young grassland birds to move around in search of food while in early stages of development when mobility is key to survival. Brome grass also out competes other native grasses and broadleaf plants. This aggressive nature turns the grass stand into a monoculture and discourages the establishment of wildlife-friendly plants that will attract bugs and insects and consequently feed for young birds.”*

*Source: Martincich, J., Pheasants Forever/Quail Forever. Smooth Brome Grass - Control in Conservation Reserve Program (CRP) Fields.*

*([http://www.ks.nrcs.usda.gov/news/coneds12/brome\\_grass.html](http://www.ks.nrcs.usda.gov/news/coneds12/brome_grass.html))*

*Smooth brome is not recommended for wildlife use because of its aggressive nature.*  
Source: NRCS Plant Fact Sheet ([http://plants.usda.gov/factsheet/pdf/fs\\_brin2.pdf](http://plants.usda.gov/factsheet/pdf/fs_brin2.pdf))

*Smooth brome provides poor forage for white-tailed deer.*  
Source: Dittberner, P.L., and M.R. Olson. 1983. *The plant information network (PIN) data base: Colorado, Montana, North Dakota, Utah, and Wyoming.* FWS/OBS-83/86.  
Washington, DC: U.S. Department of the Interior, Fish and Wildlife Service. 786 p.

Comment #1h:

2. There is no discussion and comparison of the specific benefits to the three primary wildlife species from “small grain”, corn, peas, beans, alfalfa, or “perennial foods”.

*FWP Response: Each crop type has benefits for wildlife, soil health, and weed control. The preferred crop in a given field is dictated by conditions in that field. Crops must be rotated to prevent disease and improve soil health. Legumes fix nitrogen to benefit soil fertility. Perennial food plots provide both food and cover, but may not be a good choice in areas where weed infestations are likely or areas with flood-damaged soils. Small grains may be preferred when weed control is a concern. A diversity of crop types is preferred for wildlife because none are nutritionally complete, yet all of the listed crops can provide a critical source of winter food, especially when used in combination.*

Comment #1i:

3. Nesting cover is often considered limiting to pheasant populations. Often, the best nesting cover includes residual cover from the previous growing season. Uncut hay fields and uncut natural grasses can provide nesting cover for at least several years without artificial manipulation. What has been the history (number of acres) of residual grass cover on the project area in recent years and what provisions are being made for residual grass cover in the next few years?

Comment #2a:

Ms. Foster, having read through the various WMA leases currently listed, I find conflicting information and a definite preference for ag/livestock, over real wildlife management being proposed. For example, your Elk Island grazing lease states : "Mowing and haying can result in direct mortality of birds and destruction of nests." Now if you are managing this lease for pheasant, as state, this haying would result in pheasant mortality.

*FWP Response: In eastern Montana, winter survival is generally the factor that most limits pheasant populations. Abundant nesting cover is available on the WMA, however a broader picture of pheasant habitat is beyond the scope of this EA, which specifically addresses an agricultural lease on a small portion of the WMA. Dryland grass fields may be hayed after July 15 (after pheasant nesting is complete) for the express purpose of manipulating vegetation to improve productivity for wildlife. This is conducted on an “as needed” basis, typically no more than once every three years. Irrigated alfalfa fields must sometimes be harvested prior to July 15 in order to remain economically feasible. Alfalfa plantings benefit soil, broods, and can provide high-quality forage for a variety of wildlife species. Alfalfa*

*fields are not intended to provide nesting habitat, nor are they a dominant feature on the WMA. Mortality of hens and destruction of nests has been negligible on the WMA because alfalfa fields comprise <5% of the WMA and the lessee is mindful of local wildlife. Currently no alfalfa fields are planted on the WMA due to flood damage. The statement referenced in Comment #2a refers to early-season haying or mowing of large areas ( $\geq 100$  ac) of grassland nesting habitat, and is not comparable with haying small acreages of alfalfa prior to July 15.*

Comment # 1k:

7. Referring to the last page of Appendix C, it is unclear if there will be any state share from the 201 new acres planted “at lessee's discretion” in 2013. Please clarify.

*FWP Response: There will be a state share from the 201 acres in the recently-purchased portion of the WMA. This area is currently all in crop production, so approximately 50 acres (25%) will be left standing for wildlife benefit.*

Comment #3a:

The attached maps are the basis for this comment. The old map (black and white) shows the WMA. The colored map shows the latest boundary. I assume the area with an X is the area to be cultivated. This cultivation will not help wildlife. This area should go back to native riparian vegetation. The reasons I say this:

- The hydrology of this area is able to support health native vegetation
- Wildlife have evolved with native vegetation
- Native vegetation supports all species
- The native vegetation that is expected to succeed is noted in P. Hansen's book
- Native vegetation is better suited to climate variations

*FWP Response: The commenter is incorrect regarding the location of the proposed project area—a map of the proposed project area was included in the EA. The area that the commenter refers to is in a “natural” state although encroaching smooth brome grass has degraded the wildlife value of many of the riparian areas on the WMA.*

Comment #3b: In the EA I saw nothing about managing for the effects of climate change and drought. Please consider putting this language in the EA. The maps that I am enclosing show the area to be in extreme drought now and back into 8/12 and 9/12. Cultivating over 200 acres that are in extreme drought seems unadvisable.

*FWP Response: Much of the proposed project area is irrigated and will not be severely affected by drought conditions. Conversely, leaving previously cultivated and irrigated fields dry and fallow during a drought year could have severe consequences for resident wildlife.*

DECISION NOTICE

Utilizing the EA and public comment, a decision must be rendered by FWP which addresses the concerns and issues identified for this proposed action.

FWP's analysis supports the agricultural lease of Elk Island WMA as proposed. I find there to be no significant impacts on the human and physical environments associated with this project. Therefore, I conclude that the Environmental Assessment is the appropriate level of analysis, and that an Environmental Impact Statement is not required.

**After review of this proposal, it is my decision to accept the draft EA as supplemented by this Decision Notice as final, and to recommend the continuation of the agricultural lease for Seven Sisters WMA.**

The Final EA may be viewed on FWP's Internet website: <http://www.fwp.mt.gov> or be obtained upon request from Montana Fish, Wildlife and Parks, Region 7 Headquarters, P.O. Box 1630, Miles City, Mt. 59301 (406) 234-0900.



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Brad Schmitz  
Region 7 Supervisor

March 12, 2013

Date



**APPENDIX A**  
**PUBLIC COMMENTS – SEVEN SISTERS WMA AGRICULTURAL LEASE**  
**FEBRUARY 1-22, 2013**

Comment #	Comment
1	<p><b>From:</b> Glenn Hockett [glhockett@bresnan.net]  <b>Sent:</b> Tuesday, February 19, 2013 3:12 PM  <b>To:</b> Foster, Melissa  <b>Cc:</b> Northrup, Rick; GWA Board [glhockett@bresnan.net]  <b>Subject:</b> Comments to the Seven Sisters WMA Ag Lease</p> <p>Feb. 19, 2013</p> <p>Melissa Foster  Montana Fish, Wildlife &amp; Parks  P. O. Box 342  Wibaux, MT 59353  (mfoster@mt.gov)</p> <p>Subject: Comments on the Draft EA for Seven Sisters WMA Agricultural Lease</p> <p>Dear Ms. Foster:</p> <p>a The Gallatin Wildlife Association (GWA) is a non-profit volunteer wildlife conservation organization representing hunters and anglers in Southwest Montana and elsewhere. Our mission is simply to protect habitat and conserve fish and wildlife. GWA supports sustainable management of all fish and wildlife populations through fair chase public hunting and fishing opportunities that will ensure these traditions are passed on for future generations to enjoy.</p> <p>We are commenting separately on this and three other current EAs for managing agricultural use or grazing on our public wildlife areas. These EAs have much in common. Consequently, our 4 letters contain much repeated information. The three WMAs, subjects of these four EAs, are outside our region of Montana and our members have little or no personal experience on the areas. Thus, we apologize if we are making any incorrect assumptions.</p> <p>We understand that the primary purposes of these WMAs are to support populations and facilitate hunting of white-tailed deer, ring necked pheasants and wild turkeys. Secondary purposes are to benefit a diversity of wildlife expected to inhabit the Yellowstone River valley.</p> <p>I Issues for all four EAs.</p> <p>b 1. There are no references to any scientific literature indicating positive or negative effects of agricultural food plots, artificial nesting cover, or rest-rotation grazing on white-tailed deer, ring necked pheasants or wild turkey.</p> <p>c 2. Despite years of experience with agricultural share-cropping on WMAs (9 years on 7 Sisters, 12 years on Elk Island) no local wildlife data are presented for evaluating the effectiveness of this management technique for any of the three primary wildlife species.</p>

<p>d</p> <p>e</p> <p>f</p>	<p>3. There apparently are no plans for evaluating the effectiveness of renewed or new agriculture or grazing activities on any population characteristics of any of the primary wildlife species. When public resources are being committed, we believe management goals should be precisely stated and goal-achievement should be measured. This is necessary for real adaptive management. It is necessary to demonstrate value in the use of public resources.</p> <p>4. Populations of the three primary wildlife species are complexly limited. That is, limiting factors vary greatly in space and time. However, there is very little or no discussion of habitat limitations for the three wildlife species in the project area. It seems that some habitats being created or maintained by leases on the WMAs are abundant on adjacent or nearby private lands. Will duplication of these habitats provide habitat that is limiting? Might other needed habitat types be scarcer on the landscape? All four EAs provide broad, unsubstantiated statements regarding the values of the projects to the three primary wildlife species and to many species of “other wildlife”. More precise discussion of this issue is warranted. If it cannot be provided, the need for on-the-ground evaluation of these projects is emphasized.</p> <p>5. Financial costs of alternatives are vague. Our experience is that these costs are often understated for managing private activities on our WMAs. Expected costs for weed control under the no-action alternative are not given. Personnel costs for managing and administering the projects are not provided. Costs of owning and maintaining irrigation equipment fences and for using water (at least on Isaac Homestead WMA) are not provided.</p> <p>6. The alternative of converting these lands to natural vegetation is not explored or analyzed. There is no description of what natural vegetative succession, or wildlife benefits, will occur if any of these projects are not applied to our WMAs. The only implication given is that there will be “weeds”. This seems to be largely a simplification of natural succession used to justify the projects.</p>
	<p>II Issues for Seven Sisters Agricultural Lease</p> <p>g 1. What is the basis for: “brome grass provides minimal wildlife benefit”? Are there local data or literature comparing uses of brome grass by white-tailed deer, turkeys and especially by nesting pheasants to their uses of alfalfa or other “small grain” crops?</p> <p>h 2. There is no discussion and comparison of the specific benefits to the three primary wildlife species from “small grain”, corn, peas, beans, sorghum, sugar beets or “perennial foods”.</p> <p>i 3. Nesting cover is often considered limiting to pheasant populations. Often, the best nesting cover includes residual cover from the previous growing season. Uncut hay fields and uncut natural grasses can provide nesting cover for at least several years without costly artificial manipulation. What has been the history (number of acres) of residual grass cover on the project area in recent years and what provisions are being made for residual grass cover in the next few years?</p> <p>j 4. Note that, since cropped lands are shared with 25% of the crop unharvested, the unharvested acres will have to be 4 times as valuable (on a per-acre basis) as unmanipulated land before the sharecropping begins to be justified. Admittedly, this is an oversimplification and assumes that the harvested acres have zero value for a selected wildlife function, such as winter food for white-tailed deer. However, the concept is justified and must be considered in evaluating the costs and benefits of the project and in comparing alternatives.</p> <p>5. Likewise, the value of unharvested irrigated hay would have to be 2.8 times greater than unmanipulated land before the project begins to be justified.</p> <p>6. Note that, in a given year, the wildlife value of a newly plowed and planted field may be almost zero; in exchange for 25% of the field being wildlife-useful for part of the year.</p>

<p>k</p> <p>1</p>	<p>7. Referring to the last page of Appendix C, it is unclear if there will be any state share from the 201 new acres planted “at lesee's discretion” in 2013. Please clarify.</p> <p>Please consider the above comments in evaluating the Seven Sisters agricultural lease. Since WMAs are relatively rare on the landscape, we must maximize their value in achieving our wildlife goals. Moreover, public funds and other resources should be used as efficiently and effectively as possible. We are under no illusion that this is a simple request.</p> <p>Sincerely,</p> <p>Glenn Hockett Volunteer President Gallatin Wildlife Association</p>
<p>2</p> <p>a</p> <p>b</p>	<p><b>From:</b> katqanna@gmail.com <b>Sent:</b> Tuesday, February 19, 2013 9:33 PM <b>To:</b> Foster, Melissa <b>Subject:</b> Public Comment: Seven Sisters Wildlife Management Area Agricultural Lease Environmental Assessment</p> <p>Ms. Foster, having read through the various WMA leases currently listed, I find conflicting information and a definite preference for ag/livestock, over real wildlife management being proposed. For example, your Elk Island grazing lease states : "Mowing and haying can result in direct mortality of birds and destruction of nests." Now if you are managing this lease for pheasant, as stated, this haying would result in pheasant mortality.</p> <p>So I propose No Action - do not renew or initiate any crop/haying and please manage for wildlife, not manage for ag/livestock.</p> <p>Kathryn QannaYahu</p>
<p>3</p> <p>a</p> <p>b</p>	<p>February 20, 2013</p> <p>Melissa Foster Montana Fish, Wildlife &amp; Parks P. O. Box 342 Wibaux, MT 59353 (mfoster@mt.gov)</p> <p>Subject: Comments on the Draft EA for Seven Sisters WMA Agricultural Lease</p> <p>Please accept my comments on the Seven Sisters ag lease. I also wish to be included in comments received from the Gallatin Wildlife Association. These comments are in addition to those previously submitted.</p> <p>The attached maps are the basis for this comment. The old map (black and white) shows the WMA. The colored map shows the latest boundary. I assume the area with an X is the area to be cultivated. This cultivation will not help wildlife. This area should go back to native riparian vegetation. The reasons I say this:</p>

- The hydrology of this area is able to support health native vegetation
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c In the EA I saw nothing about managing for the effects of climate change and drought. Please consider putting this language in the EA. The maps that I am enclosing show the area to be in extreme drought now and back into 8/12 and 9/12. Cultivating over 200 acres that are in extreme drought seems unadvisable.

Thank you for considering my comments.

Nancy Schultz

420 N. 10<sup>th</sup> Ave.

Bozeman, MT 59715

[nancyanaconda@msn.com](mailto:nancyanaconda@msn.com)