

**From:** James Olson <jwodentmt@aol.com>  
**Sent:** Thursday, February 28, 2019 1:18 AM  
**To:** Rose, Sharon  
**Subject:** 01 (Olson)--Re: Using Cattle Grazing to Manage Elk Habitat on Spotted Dog WMA and Adjacent Lands--Draft EA

I like it do it Jim



In a message dated 2/27/2019 1:06:58 PM Hawaiian Standard Time, shrose@mt.gov writes:

Hello,

FWP proposes to implement an exchange-of-use cooperative grazing system (grazing system) on the Spotted Dog Wildlife Management Area (SDWMA) and adjacent private lands in Powell County northeast of Deer Lodge, Montana. The proposed grazing system would seek to establish a balanced distribution of grazing by elk and cattle to improve grassland habitats across SDWMA and private ownership boundaries. The grazing system would be implemented on a portion (~8% or 2,800 acres) of SDWMA and would remain in effect for approximately 6 years beginning in early summer 2019.

The primary goals of the proposed action are to: 1) improve the health and productivity of native grasslands over a larger landscape by scheduling grazing treatments that are separated by long rest periods on SDWMA and adjacent lands; 2) use grazing treatments on SDWMA to enhance spring transition range for a migratory elk herd and to introduce greater structural complexity to grasslands, intended to benefit a variety of wildlife species; and 3) allow native grasslands adjacent to SDWMA that comprise critical elk-winter range to be rested on a scheduled basis, which would also benefit other game and nongame wildlife.

A **draft environmental assessment (EA)** has been prepared for this proposal, and it may be obtained by mail from Region 2 FWP, 3201 Spurgin Road, Missoula 59804; by phoning 406-542-5540; by emailing [shrose@mt.gov](mailto:shrose@mt.gov); or by viewing FWP's internet website <http://fwp.mt.gov> ("News," then "Recent Public Notices," beginning February 22, 2019).

The webpage for this draft EA, along with the opportunity to comment online, is:

[http://fwp.mt.gov/news/publicNotices/environmentalAssessments/developmentImprovementsAndEnhancements/pn\\_0394.html](http://fwp.mt.gov/news/publicNotices/environmentalAssessments/developmentImprovementsAndEnhancements/pn_0394.html)

**Comments** may be made online on the EA webpage or may be directed by mail or email to the addresses above. Comments must be received by FWP **no later than March 28, 2019**. (Due to a

delay in issuing this EA, the original comment-deadline date, listed in the newspaper legal notices as March 25, has been extended.)

**Sharon Rose**

*Comments Coordinator, Region 2*

Montana Fish, Wildlife & Parks

3201 Spurgin Rd

Missoula, MT 59804

Ph: (406) 542-5540

[shrose@mt.gov](mailto:shrose@mt.gov)

Montana FWP



THE OUTSIDE IS IN US ALL.

Rose, Sharon

#2

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**From:** slowtwitch73@gmail.com  
**Sent:** Thursday, February 28, 2019 8:57 AM  
**To:** Rose, Sharon  
**Subject:** 02 (Schmitt)--Public Comment: Proposal to Use Cattle Grazing for Managing Elk Habitat on a Portion of Spotted Dog WMA and Neighboring Private Lands--Draft EA

Name: Mike Schmitt  
City: Missoula

I am opposed to any cattle (or sheep) grazing on FWP lands. The W is FWP is for wildlife. Those lands evolved without domestic animals on them and they reached they peak without them.

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This e-mail was generated from the 'Proposal to Use Cattle Grazing for Managing Elk Habitat on a Portion of Spotted Dog WMA and Neighboring Private Lands--Draft EA' Public Notice Web Page.

Rose, Sharon

# 39

**From:** jim crichton <jameswrichton@yahoo.com>  
**Sent:** Thursday, February 28, 2019 12:05 PM  
**To:** Rose, Sharon; Charlie Mc Carthy  
**Subject:** 03a (Crichton)--Re: Using Cattle Grazing to Manage Elk Habitat on Spotted Dog WMA and Adjacent Lands--Draft EA

Sharon,

Thanks for letting me know about this. I have been spending more time on the Spotted Dog. Certainly habitat is better than when the FWP land was first acquired.

I need to have a better idea of the context. What other grazing is being done on the Spotted Dog? Will the fees mirror FS and BLM @ about \$1.34 or be more like DNRC around \$20 per AUM. Where will the money go? I see that the Wineglass allotment is large and right on prime range. Last I heard, Wineglass does not allow public access on its land. It might be right to give the McQueary Ranch some grazing to make up for winter use by livestock on their land. It should be monitored though. I have to laugh when I see over and over statements that domestic livestock grazing improves habitat for anything but cows. So called objective numbers should be raised by a multiple now that you are going to manage the forage. As you know, the "Objective" is a subjective number determined by ranchers and not by habitat characteristics or public opinion. They have their land; we have ours. If we can cooperate, great, but I bet tired of all the B.S.

Sincerely,  
Jim Crichton

On Wednesday, February 27, 2019, 4:07:02 PM MST, Rose, Sharon <shrose@mt.gov> wrote:

Hello,

FWP proposes to implement an exchange-of-use cooperative grazing system (grazing system) on the Spotted Dog Wildlife Management Area (SDWMA) and adjacent private lands in Powell County northeast of Deer Lodge, Montana. The proposed grazing system would seek to establish a balanced distribution of grazing by elk and cattle to improve grassland habitats across SDWMA and private ownership boundaries. The grazing system would be implemented on a portion (~8% or 2,800 acres) of SDWMA and would remain in effect for approximately 6 years beginning in early summer 2019.

The primary goals of the proposed action are to: 1) improve the health and productivity of native grasslands over a larger landscape by scheduling grazing treatments that are separated by long rest periods on SDWMA and adjacent lands; 2) use grazing treatments on SDWMA to enhance spring transition range for a migratory elk herd and to introduce greater structural complexity to grasslands, intended to benefit a variety of wildlife species; and 3) allow native grasslands adjacent to SDWMA that comprise critical elk-winter range to be rested on a scheduled basis, which would also benefit other game and nongame wildlife.

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[shrose@mt.gov](mailto:shrose@mt.gov); or by viewing FWP's internet website <http://fwp.mt.gov> ("News," then "Recent Public Notices," beginning February 22, 2019).

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**Sharon Rose**

*Comments Coordinator, Region 2*

Montana Fish, Wildlife & Parks

3201 Spurgin Rd

Missoula, MT 59804

Ph: (406) 542-5540

[shrose@mt.gov](mailto:shrose@mt.gov)

Montana FWP



THE OUTSIDE IS IN US ALL.

**From:** jameswrichton@yahoo.com  
**Sent:** Friday, March 22, 2019 10:45 PM  
**To:** Rose, Sharon  
**Subject:** 03b (Crichton)--Public Comment: Proposal to Use Cattle Grazing for Managing Elk Habitat on a Portion of Spotted Dog WMA and Neighboring Private Lands--Draft EA

Name: Jim Crichton

City: Helena, MT

Montana Fish Wildlife and Parks has an inspiring and unusual opportunity to manage wildlife in the Spotted Dog WMU. Usually, FWP is in a bureaucratic vise between the Fish and Game Commission and a land resource management entity like BLM or US Forest Service. Such entities might have political or legacy reasons to keep things as they are instead of applying known science to improve management for wildlife. Here, FWP can manage habitat for wildlife, if it chooses to. I can understand why some want to work with the McQueary Ranch in the hope of a the mutual advantage of better grazing for McQueary cattle and for elk. One must wonder why several landowners can have more influence than 1,000,000 Montana citizens. Surely some think that grazing reasonable numbers of cattle for the months of June and July every third year can't hurt elk much, but this is not purely about cows and elk. Early season grazing is harmful to blue bunch wheat grass.

It is stated and implied frequently in the two above mentioned publications that cattle grazing improves habitat. No bibliography supporting this premise is included. Sometimes, Allan Savory is quoted in such discussions. His work is very good, but his habitat and the community of herbivores is different from ours as it is in Zimbabwe. Most of the earth's surface that is not under crops, but grows forage is grazed by domestic livestock. Can we have one small piece that is actually managed just for the entire community of wildlife?

The case, as presented, for putting cattle on the Spotted Dog, is unconvincing. I vote NO.

Sincerely, Jim Crichton

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This e-mail was generated from the 'Proposal to Use Cattle Grazing for Managing Elk Habitat on a Portion of Spotted Dog WMA and Neighboring Private Lands--Draft EA' Public Notice Web Page.

Rose, Sharon

#4

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**From:** alolcott@gmail.com  
**Sent:** Thursday, February 28, 2019 12:57 PM  
**To:** Rose, Sharon  
**Subject:** 04 (Olcott)--Public Comment: Proposal to Use Cattle Grazing for Managing Elk Habitat on a Portion of Spotted Dog WMA and Neighboring Private Lands--Draft EA

Name: Andrew Olcott  
City: Deer Lodge

In my opinion, this plan makes good sense. It looks like a plus for Dan and a plus for the elk. It would make good use of the grass forage when it is available and leave more grass in the winter range for the elk. The effects of the intensive grazing during the summer would be interesting to evaluate and see if the range improves. Hunters would benefit too as Dan allows hunting and the elk would tend towards the ranch.

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This e-mail was generated from the 'Proposal to Use Cattle Grazing for Managing Elk Habitat on a Portion of Spotted Dog WMA and Neighboring Private Lands--Draft EA' Public Notice Web Page.



**NATIVE ECOSYSTEMS COUNCIL**

P.O. Box 125

Willow Creek, MT 59760

March 12, 2019

Montana Department of Fish, Wildlife and Parks  
Region 2 Headquarters  
3201 Spurgin Road  
Missoula, MT 59804

**RE: Comments on the Draft Environmental Assessment (EA)  
for a MFWP Proposal to Implement an Exchange-of-Use  
Cooperative Grazing System on the Spotted Dog Wildlife  
Management Area (SDWMA) and Adjacent Private Land**

Hello,

Native Ecosystems Council (NEC) would like to provide the following comments on the draft EA for the proposed "exchange-of-use cooperative grazing system for the SDWMA.

1. The request for comments seems to be a pointless process given that a final decision will be released in just 4 days, on April 1, after the deadline for comments is passed. How can the comments that are provided actually be reviewed, and potential changes made to the EA as a result?
2. There is a complete lack of any analysis or direction as to how conflicts between the proposed grazing and predators will be addressed. If wolves or grizzly bears are killing private cattle grazed in this wildlife management area, will they be removed? If so, this is a significant wildlife impact of the proposed grazing use of this WMA and needs to be not only evaluated, but fully disclosed to the public.
3. There is a surprising bias in the draft EA regarding the impacts of grazing on vegetation. The claim that "controlled grazing" will improve the productivity of grasses was never supported with any existing research. The current body of science that supports this claim needs to be provided, especially as it is one of the justifications for allowing cows to graze in the

#5



WMA. The rationale seems to suggest that removal of litter will increase productivity, which is surprising. One of the key components of soil health is the amount of carbon residues it contains. We are not aware of any science that suggests that reducing the amount of litter that decomposes in the soil is a benefit to vegetation. Current agriculture practices optimize litter content of the soil. It is also not clear why spring grazing increases grass production, or why grazing increases forbs. If this is the case, it is likely due to decreased competition with grasses due to consumption by cows. The efforts of the MFWP to claim that the proposed grazing will benefit wildlife by improving forage conditions raises a question of agency credibility in regards to the proposed grazing program.

4. The heavy winter use on adjacent private lands by elk will not be particularly detrimental to grasses, as they are dormant at that time. On the other hand, livestock grazing beginning in June, before grasses have matured and set seed, on the WMA will in fact be detrimental to their health. So this is not an even trade as per range health.

5. The introduction of livestock grazing in the WMA is a clear contradiction for which the area was purchased. And this project, which is slated for 6 years, is likely just the beginning of a much larger grazing program. As is noted in the various public comments on this project, many of the WMAs in Montana are grazed. And comments provided by MFWP personnel at public meetings have indicated that private grazing interests have requested use of the SDWMA for alternate grazing to replace losses due to fire. And of course, this could also include impacts of drought. It is likely that this proposal is just the beginning of long-range goals to establish livestock grazing systems across the SDWMA.

6. Most disturbing for this proposal is that it not only ensures that all existing barbed wire fencing in the SDWMA will remain in place, but that an undisclosed amount of additional fencing will be progressively added over the years to develop a system of pastures for livestock grazing. There is no science the agency can point to that shows barbed wire fences are okay for wildlife. This includes entanglement problems for big game, especially their calves/fawns, and also for many species of birds, including raptors, due to feather entanglement or direct mortality or serious injury from fence strikes. We frequently see the term "wildlife friendly fences" in reference to barbed wire fences. Although we didn't see that term in the draft EA, the overall impact of fencing was clearly ignored. This was apparently due to

the claim that electric fencing will be used. However, even if the new fencing is electric, it is noted that existing fences already in place will also be part of the pasture system. There is no place for barbed wire fences on a WMA, and all such fences need to be removed. Retaining existing barbed wire fencing in order to implement this grazing program is inconsistent with the purpose for which the WMA was purchased.

7. There was no actual documentation in the draft EA as to how it has been determined that elk prefer previously-grazed areas by cattle in both the spring and the fall. And as for the fall, if there is a drought, there will be little fall regrowth of grasses that would be available to elk.

8. There is no analysis provided in the draft EA as to how the proposed livestock use will affect aspen. Throughout southwest Montana, cattle are destroying aspen stands by preventing recruitment, while old trees die out. There is no information in the draft EA as to the location of aspen stands in the proposed pastures. It could be that these stands will be fenced out from cows because they occur in riparian areas. However, this is not clear. This continued degradation and destruction of aspen stands would be a significant negative impact of livestock grazing that was never addressed.

9. The draft EA claims that livestock grazing will benefit nongame species by improving their habitat. Again, there was no actual documentation of these claims. These conclusionary claims are not appropriate in an EA.

10. Another issue that was almost completely ignored in the draft EA was the impact of livestock grazing on weeds, including cheatgrass. The problems with cheatgrass were certainly noted in the various public comments, but not in the draft EA. In addition to what appears to be extensive infestations of cheatgrass across this WMA, there are currently no effective means of removing it, and at times, from even controlling its expansion. And it is known that livestock grazing enhances conditions for cheatgrass, as well as promotes its spread. Cheatgrass infestations are a huge ecological problem across southwestern Montana, and MFWP management strategies that will directly increase these infestations are alarming.

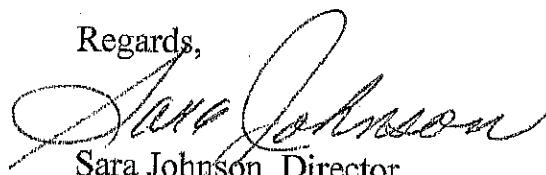
10. The draft EA is relatively silent on how water will be developed for the 4 pastures to be created in the SDWMA. If springs are going to be developed for water tanks for cattle, this is clearly an adverse impact on these

ecosystems, as the result in a drying out of key limited habitat for wildlife, including snails and amphibians. These also result in less water returning to the riparian systems and streams in the landscape. The MFWP needs to provide much more information and analysis as to how water will be provided for livestock, instead of simply saying that some openings will be provided in fenced riparian areas for livestock access. It is our experience that every grazing program includes the relentless development of yet more water sources for cows.

11. The draft EA mentions cowbirds, but somehow suggests that any adverse impacts from cowbird parasitism will be temporary. Cowbirds are known to create significant losses for nesting songbirds "temporarily" during their nesting season. And it is well established that cattle and cowbirds go together. Introducing cows into this wildlife management area will clearly have an adverse impact on songbirds. Again, there are vast areas of Montana that are grazed by cattle, and thus promote cowbird habitat. Surely more of this promotion is not a benefit to wildlife.

In conclusion, one can only assume that the proposed grazing program in the SDWMA is being implemented due to political pressure from the livestock industry. This is unfortunate, as there are few areas in Montana that are not grazed by livestock, or fragmented by countless miles of barbed wire fences. The provision of ungrazed, unfenced areas would clearly be a wildlife benefit, and increase the diversity by adding more of a high value but extremely limited habitat. On the other hand, there is currently no evidence that the elk population in this landscape needs improved foraging habitat, since the populations is considered "too high." There is clearly no problem that needs to be "cured" with cattle grazing.

Regards,



Sara Johnson, Director  
Native Ecosystems Council

Rose, Sharon

#6

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**From:** russella17@gmail.com  
**Sent:** Monday, March 4, 2019 9:21 PM  
**To:** Rose, Sharon  
**Subject:** 06 (Russell)--Public Comment: Proposal to Use Cattle Grazing for Managing Elk Habitat on a Portion of Spotted Dog WMA and Neighboring Private Lands--Draft EA

Name: Alex Russell

City: Bozeman

Dear Ms Rose,

As a public land hunter and recreationist, i object to the excessive livestock grazing that is routinely occurring on Montanan's wildlife management areas, including Spotted Dog. These areas, as the name implies should be set aside for wildlife. I don't object to grazing in general which can sometimes be beneficial, but from what I have seen on some of our other WMAs, such as Rob-Ledford, Elkhorn, and Beartooth, the grazing consistently has been excessive. More importantly, it negatively impacts the hunting and outdoor experience which is so important to small businesses in Montana. It is in the best interests of all Montana sportsmen that we no longer graze our WMAs, including Spotted Dog. Thank you.

Alex Russell

Bozeman

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**Rose, Sharon**

# 7

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**From:** Julie Sparks <boysnmama5@gmail.com>  
**Sent:** Monday, March 18, 2019 2:10 PM  
**To:** Rose, Sharon  
**Subject:** 07 (Sparks)--Spotted dog

Writing in response to the proposal by Fish, Wildlife & Parks to put in place a new cooperative cattle grazing system on a portion of the Spotted Dog Wildlife Management Area.

My concern is that we have had a lot of moisture which will cause the growth to become overgrown if there is minimal summer grazing and that would be a fire hazard.

Julie Sparks

Rose, Sharon

#8

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**From:** pwgeorge@bresnan.net  
**Sent:** Monday, March 18, 2019 3:52 PM  
**To:** Rose, Sharon  
**Subject:** 08 (George)--Public Comment: Proposal to Use Cattle Grazing for Managing Elk Habitat on a Portion of Spotted Dog WMA and Neighboring Private Lands--Draft EA

Name: Patrick W. George  
City: Deer Lodge

I believe the agreement that has been reached between the FWP and the Mcqueary Ranch will benefit both parties. The ground in question on the SDWMA has been over grown and needs to be grazed to improve the grass land. Also late in the year the ground has been a big fire danger. If it were to burn it could have an impact on a large part of the west continental Divide. This will also provide more hunter access to the SDWMA and the Mcqueary ranch.

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Rose, Sharon

#9

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**From:** Jodi Pauley <wjpauley@gmail.com>  
**Sent:** Tuesday, March 19, 2019 3:23 PM  
**To:** Rose, Sharon  
**Subject:** 09 (Pauley)--spotted Dog Cattle Grazing proposal

Dear FWP Region 2,

I stand in support of the Draft EA of the proposed use of cattle grazing for managing elk habitat on the Spotted Dog WMA and neighboring private lands. While I feel more of the Spotted Dog would benefit from cattle grazing this is certainly a step in the right direction and is very conservative for both the WMA and the landowner and gives FWP a chance to showcase how cattle grazing can be a win win for wildlife management and working with adjoining ranch neighbors. I appreciate the time to be able to comment on this and once again stand in favor of this EA for cattle grazing on the Spotted Dog WMA.

Sincerely, Jodi Pauley

Sent from Mail for Windows 10

Rose, Sharon

#10

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**From:** Mark Eisenbeil <markeisenbeil@yahoo.com>  
**Sent:** Wednesday, March 20, 2019 7:06 AM  
**To:** Rose, Sharon  
**Subject:** 10 (Eisenbeil)--Comment on grazing cattle in Spotted Dog

Hi Sharon, I just wanted to make a comment about grazing cattle on Spotted Dog Wildlife Management Area. I'd have to say I'm against the idea because I don't see any benefits brought on by grazing practices. I thought the area was purchased with public funds for wildlife management. Cattle are domestic and grazing on this site them goes against the original concept of the wildlife area. I just don't see where grazing practices aid the landscape. Since cattle grazing was stopped on Spotted Dog, I've noticed the land slowly returning to a more natural state, at least where I venture about on the western half of the area. Places, where the cattle have wandered onto Spotted Dog from adjoining grazing areas or ranches, had been slightly impacted, but their numbers were small. Cattle cause erosion by trampling the ground, cutting trails and devouring vegetation. Wild animals, such as elk, impact the landscape as well. but on a smaller scale, unless you're talking about haystacks and fences. I know this view is not what those who graze cattle would agree with and I understand their point of view as well. If I had cattle, I'd like to graze them on Spotted Dog also because there's a lot of feed for them. I'm sure the cattle will end up being grazed on the area because that's what the popular opinion seems to be, at least with the people who I've discussed the issue with around Deer Lodge, but I just had to give my two cents for what it's worth.

Sincerely,  
Mark Eisenbeil  
Deer Lodge



Rose, Sharon

# 11

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**From:** mkk@bresnan.net  
**Sent:** Wednesday, March 20, 2019 7:46 AM  
**To:** Rose, Sharon  
**Subject:** 11 (Kauska)--Public Comment: Proposal to Use Cattle Grazing for Managing Elk Habitat on a Portion of Spotted Dog WMA and Neighboring Private Lands--Draft EA

Name: Robert Kauska

City: helena Mt.

The worst thing that happened to spotted dog was the governor bought it. Since it has been opened up to ATVs in a larger capacity and now they abuse it and extent there own trails. you can walk back in a mile off roads and have 4 wheelers go buy you. The game has been pushed off , depleted. The grass in the spotted dog has always been over grazed and now we see cows in hunting season. it is supposed to be a wintering ground for elk and there isn't much for elk to eat , probably sending them to neighboring properties. Explaining the near by damage hunts. poor planning management by the forest service and the FWP. And I figure this will be tossed as FWP and I know the forest service, doesn't care what the public think. Thank You

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This e-mail was generated from the 'Proposal to Use Cattle Grazing for Managing Elk Habitat on a Portion of Spotted Dog WMA and Neighboring Private Lands--Draft EA' Public Notice Web Page.

Rose, Sharon

#12

**From:** bhammer2@hotmail.com  
**Sent:** Thursday, March 21, 2019 5:22 AM  
**To:** Rose, Sharon  
**Subject:** 12 (Hammer)--Public Comment: Proposal to Use Cattle Grazing for Managing Elk Habitat on a Portion of Spotted Dog WMA and Neighboring Private Lands--Draft EA

Name: Bill Hammer

City: Clancy, MT

Proponent comments on the proposal to enter into a cooperative grazing system on a portion of the Spotted Dog Wildlife Management Area (SDWMA): I have read the Draft EA and I have recreated, hiked and hunted, within portions of the SDWMA. I support entering into this grazing agreement as described in the Draft EA, for the specified 6 year period, and with a thorough evaluation of the effects of the grazing treatment on the overall health of the SDWMA ecosystem during and at the end of the 6 year period.

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**Rose, Sharon**

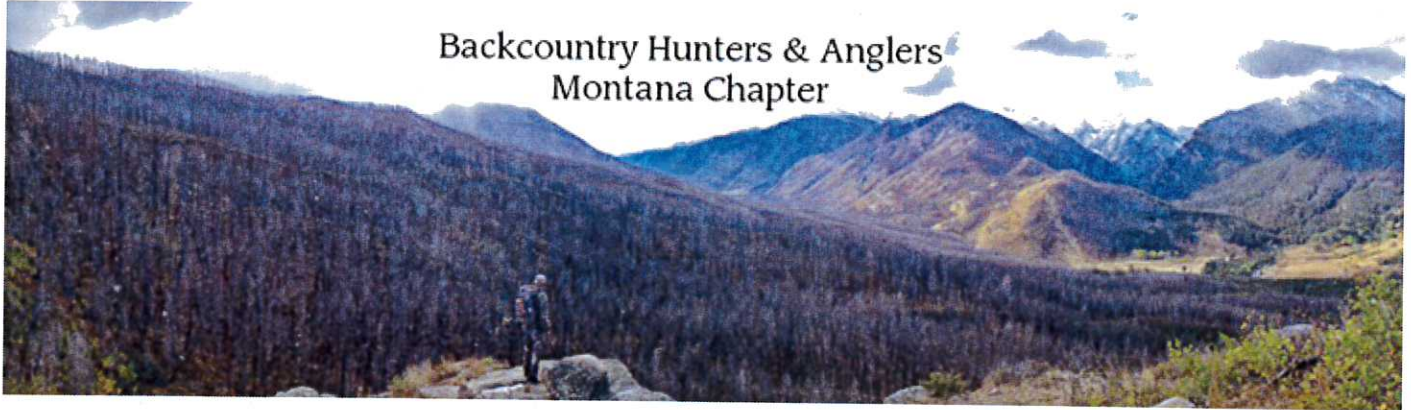
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#13a

**From:** Greg Munther <gmunther12@gmail.com>  
**Sent:** Friday, March 22, 2019 10:24 AM  
**To:** Rose, Sharon  
**Subject:** 13a (MT BHA, Munther)--MT BHA Comments on Spotted Dog WMA Grazing EA attached  
**Attachments:** SDWMA Final.docx

Sharon, please acknowledge via email that you received our comments. )

#13a



1295 Lena Lane  
Missoula MT  
March 19, 2019

Randy Arnold, Regional Supervisor  
MDFWP  
Spurgin Road  
Missoula, MT 59804

Dear Randy:

Re: SDWMA Grazing

Montana Chapter of Backcountry Hunters and Anglers welcomes the opportunity to comment on the Draft EA regarding the proposal to graze parts of the Spotted Dog WMA. Our organization has grown to nearly 3000 Montana hunters and anglers who value Montana's wildlife and public lands. Many members value, enjoy and use the Spotted Dog landscape and its multitude of wildlife species. We seek optimization of all native wildlife and fish species on the WMA. We consider the outcome of this proposal as an extremely pivotal decision FWP will make regarding the future of Spotted Dog WMA.

**Public Participation:** Despite many communications with FWP re SDWMA and specifically grazing, MT BHA is disappointed to have had no advance notice and opportunity for the public to examine the proposed pastures on the ground before being covered with snow and practically impossible to visit in March. The schedule of the grazing to commence in July 2019 leaves no opportunity for the public to visit the proposed sites in time to suggest changes from the Draft to a Final EA. Several sportsmen organizations and individuals, including MT BHA, had previously submitted concerns about future livestock grazing in their comments to the Draft Plan for the SPWMA. Public concern regarding potential grazing was well established, and perhaps the most dominant issue concerning sportsmen in development of the Management Plan. In contrast to this tight schedule, we note that several adjacent ranchers were contacted in 2017-2018 (page 8) about grazing before this proposal was developed.

Unfortunately, without on the ground knowledge we must rely only on the Hansen report's Ecological Inventory and Health Assessment of Spotted Dog Wildlife Management Area (EIHA). We request that any decision to graze be postponed until interested sportsmen groups can visit the proposed pastures during the summer growing season. After a summer field visit, we request that these sportsmen groups and individuals have an opportunity to provide additional comments into the decision process prior to any decision.

**Range of Alternatives:** The range of alternatives, as either the Proposal or No Action, is minimal. There were no alternative grazing schedules, no alternative pasture systems, no alternatives to allowing livestock open water sources and no alternative to protect seeps and springs and riparian areas. There is no WMA need or obligation to graze SPWMA with livestock. To our knowledge, there is no recent authorized grazing by this rancher on what is now the SDWMA. This land was purchased with public monies solely for wildlife and public use.

The dismissal of the No Action Alternative (p 14) is worded negatively and is wholly inadequate, and seeks to dispel the value of No Action. The "analysis" fails to acknowledge that without livestock grazing riparian areas would improve more rapidly, that risk of invasive weed spread would be considerably less, and there would be no cost of implementation nor administration. The "analysis" fails to acknowledge that vegetative diversity is already abundant in the SDWMA, as measured by diversity of vegetative plant communities, elevations and aspects. The "analysis" falsely portrays that, because there is potentially attractive regrowth on a few hundred acres, elk will use the SDWMA more, rather than just be redistributed to a small part of the SDWMA. The "analysis" also fails to acknowledge that elk populations that are at 2x "objective" are doing well biologically and would be expected to do well with the current situation in the foreseeable future. The No Action Alternative "analysis" fails to acknowledge all wildlife obligate to riparian areas, wet seeps and springs would fare better with No Action than the proposed action.

### **Proposed Action Design**

The design of the proposed action has several elements that contribute to a high risk of failure. The proposed pastures will require 2-3 miles of temporary perimeter electric fence that will not have constant monitoring, and are subject to probable multiple failures initiated by both livestock and crossing wildlife. The landscapes within pastures are not uniform (EIHA photo page 24) but vary by upland vegetative types, terrain and water, all of which will contribute to differential grazing rates. As a result some sites will likely be overgrazed. The EA does not display any calculations of forage capacity or utilization by pasture or vegetative type. The area to be grazed already contains several invasive species, which will likely spread by favorable spread conditions caused by grazing. Predictable livestock concentrations near salt and water, as well as at bedding areas will result in bare soil fostering more weed spread. Apparently there will be ATV use permitted by the permittee, which by repeated route travel will create new motorized trail routes and contribute to spread of invasive species. The proposed minimal monitoring without a baseline nor control area comparisons will not be able to detect trends in plant communities attributable to livestock grazing. The remoteness of the pastures and lack of trained on-the-ground personnel will be unable to detect needed changes. The lack of definitive

enforceable stipulations or requirements for the permittee will not enable FWP to assure desirable outcomes.

Given this proposal is not driven by a compelling SDWMA resource conflict or need, we have speculated that politics rather than resource needs are a primary driver in this proposal. We note that grazing the SDWMA was pushed by a member of the Land Board when the failed land exchange of State lands within the SDWMA was proposed a couple of years ago. Also, the local atmosphere in the development of the SDWMA plan was tilted by many ranchers toward grazing the SDWMA.

**Riparian:** Riparian areas represent only 2% of the WMA on an otherwise relatively dry landscape, but are used disproportionately by the majority of wildlife species. Some species are obligate to riparian and wet areas. Big game, grouse and furbearers use them disproportionately as well. Through a century of grazing, Hansen documented riparian vegetative health is much reduced. Our personal observations have confirmed Hansen's (EIHA photos pages 26,28,168, 186,221, 236, 237) that shrub components of riparian areas within proposed pastures has been greatly reduced by past livestock grazing. In many cases willows are either no longer present or reduced to old ice-cream-shaped individuals. The five years of partial rest (except trespass livestock) may have contributed to beginning recovery, but this is a slow process especially given the well-known, persistent livestock trespass. Although the proposed pastures avoid major drainage streams, there are small streams, wet riparian areas and wet seeps and springs remaining that are proposed to be grazed and would remain unprotected. However, EA page 6 states livestock watering will be limited to "water gaps", which are normally defined as narrow fenced access points to a very small reach of stream, but none are identified in any of the pastures nor are protective interior fences proposed. Grazing a seep or spring is not considered a "water gap". Grazing a stream reach is not considered a "water gap". Livestock in summer disproportionately graze wet areas. Since the proposal relies on naturally occurring surface water for livestock, this proposal will inappropriately threaten these riparian areas, which apparently are considered overgrazed, "sacrifice areas". With additional fencing and water delivered to each pasture with solar powered pumps, these most valuable areas could be protected before commencing grazing.

All or nearly all the proposed private land pastures also have some riparian area, including that of Fred Burr Creek. How will confining livestock on these riparian areas in the hottest, driest summer months affect the riparian health on private lands? Hansen noted "Both polygons (note: both were in WMA) in Fred Burr Creek were barely above Unhealthy rating" due to invasive species, plant species that increase with heavy grazing and woody shrub browse levels. It does not seem prudent to implement perhaps an even more intensive grazing pattern where these problems may already exist.

**Contract:** There is no draft binding or obligatory document (e.g. Contract) provided to assure the public land stakeholders that grazing operations will satisfy measures to minimize risk and minimize potential adverse effects. From what we can gather from a Department slide presentation and subsequent questions, there are no upland vegetation utilization standards, no riparian vegetation grazing standards, no specific requirements to move salt at specific times, and no quantitative triggers that would remove livestock. There are no constraints on the ranchers use of ATVs on vegetation, riparian areas or wet soils. There is no specification on how cattle would be moved to WMA pastures from

private ground. There are no preventative measures to assure that transported cattle from private lands would not introduce new invasive species onto the SDWMA. There are no requirements on how often the rancher needs to ride fences, repair fences nor remove escaping livestock. A guiding document titled "Pasture Grazing Leases: Put it in Writing" (Jeff Mosley, Extension Range Management Specialist, Montana State University) emphasizes, "A written lease agreement reminds all parties of the terms originally agreed upon and also provides a valuable guide for others if either the landowner or tenant dies or otherwise becomes incapacitated". In this situation of a private party grazing public land, a signed, enforceable, detailed written agreement with quantitative stipulations is critical to avoid misunderstandings, and to communicate to the public exactly what is expected of the private party grazing their public lands. Without such a written agreement, the public inspecting these pastures has no way of knowing if the grazing and operators are within stipulations. Also without clear, specific stipulations, there is no ability for the public to hold either party responsible. We would expect such a contract to contain stipulations as to how perimeter fences are to be installed and how often inspected, when and how fences will be removed, when and how ATV use is authorized, time constraints to recover escaping livestock, how often salt is to be moved, how movement is to occur of livestock moved from private to public lands, how livestock predation by native predators are to be handled, and conditions which would require removal of livestock, and conditions which would terminate the contract.

Similarly on private lands, what stipulations will be in place for assuring grazing rest occurs as planned and there is a democratic hunting access process open equally to all qualified sportsmen? Why is enrollment in Block Management not required? A handshake or casual agreement between FWP and a private land owner is not a sufficient guarantee of protection of a public resource.

**Economics:** We note that sportsmen will fund \$10,000 to provide electric fencing. In addition, not acknowledged in the Draft EA, is the cost of preparing the EA, the cost of supervision and installing the fences, and cost of administering the agreement and monitoring and evaluation. There may be legal costs as well. As a minimum, we would expect these hidden costs to be several thousands of dollars per year. We note that the State Lands current grazing rate is approximately \$15/AUM . With a verbally expressed (fwp employee slide presentation) expected use of 300-400 AUMs annually, a reasonable lease return should be in the area of \$4000-6000 annually. Yet the proposal is to not require any payment for this grazing. Given the marginal benefits and significant costs of this proposal, we question the prudence of such expenditure of public monies.

**Invasive Species:** Hansen summarized Upland sites as only 35% Healthy and 65% remaining were either with problems or non-functional. In addition, Hansen documented 22 noxious weed species on the WMA. Invasive species are found on 43% of the WMA, according to Hansen's study, with an average of 2.7 invasive species per sample plot. Multiple invasive species are found on the proposed pastures, and all of Hansen's plots in the proposed pastures have invasive species. The EA fails to acknowledge the risk of irreversible spread of invasive species enhanced by introduction of livestock grazing. Reduction of ground litter (EIHA photos page 23, 224, 225), damage to the protective biological soil crusts, exposure of bare soil, trampling of seed, and reduced competition and vigor from desirable plants are all well-known factors favoring invasive species spread and dominance. Each of these contributing negative

factors will occur if grazing occurs as proposed. According to Columbia University (2004) Introduced Species Summary Project-Cheatgrass *"Grasslands.....are characterized by a delicate layer of cryptogams covering the soil between shrubs which are susceptible to damage from cattle" and further "cheatgrass has a competitive edge when grazing and frequent fires are introduced into native ecosystems."*

The Hansen plots within the proposed pastures document the presence of several species of invasive species, including cheatgrass (EIHA photos p 31, 50, 139, 242), spotted knapweed (EIHA p 148), houndstongue and thistle (EIHA p 51, 131). Grazing June 1 thru July 31 is perfect timing to encourage livestock hooves grinding seedripe cheatgrass seed (and other invasive seeds) into the soil ( p 15 1b). All the four Hansen plots within pastures were scored as "Healthy with Problems" How will grazing correct the problems that were identified by Hansen?

Hansen (p 154) summarized the SDWMA invasive species risk " Although present in small amounts, several invasive species represent very serious threats of rapid increase and disruption of ecologic function." The SDWMA Habitat Plan emphasizes the threat of cheatgrass as " Watch cheatgrass distribution and avoid creating niches for cheatgrass expansion" (Exec summary). This proposal is in direct contradiction to that direction by creating a niche for cheatgrass expansion with livestock grazing. Hansen (p 162) summarizes upland grasslands "Many of the native plant species found on Spotted Dog WMA can compete with introduced species, and given time and rest from livestock grazing (emphasis added) some of the introduced species may decrease." Simply, with 22 invasive species already on SDWMA, the potential spread of any of these is significantly enhanced with livestock grazing.

Once in place, cheatgrass is practically impossible to eliminate and prone to increase towards dominance with grazing. Several photos in Hansen's publication document significant or dominant cheatgrass on the SDWMA where past disturbance have occurred (EIHA photos page 31, 50, 139, 242). Most importantly, the effect of cheatgrass spread has an adverse effect on productivity and health of desirable plants. Forage values can be reduced by 80% with cheatgrass dominance. Spot spraying cheatgrass, as is proposed in the EA, is simply ineffective, and effective herbicides are non-selective and therefore would likely damage native vegetation. Once cheatgrass becomes a major vegetative component, it increases wildfire frequency exponentially due to flashy fuels and early season curing. Frequent rangeland fires foster the decline in desirable components of the vegetative community and favors invasive species and annuals. With more frequent fires and grazing, other invasive species also proliferate. According to a Forest Service literature review "Cheatgrass alters successional trajectories of postfire plant communities by interfering with native seedling establishment, by competing with established perennials for resources, and by shortening the interval between fires."

**Monitoring:** The proposal for monitoring is minimal and would not meet professional monitoring design standards to adequately address issues related to vegetative changes and vigor, riparian health and vegetative condition, effects of grazing on non-game species, nor expansion of noxious weeds. There is no science-based monitoring design nor sampling rigor in the proposal to assure statistical reliability of results. Replicating three of Hansen's plots after several years and a few photopoints (no scale indicated) would only document the most egregious adverse effects. Hansen's plots are insufficient in number and not designed to be a baseline for monitoring. As a minimum, a year of baseline of replicable



vegetative composition plots of all vegetation types subject to grazing is needed. Because grazing is proposed to commence in July 2019 this would almost certainly not occur.

Apparently proposed monitoring will be limited to some photopoints and an annual ride by an eastern Montana FWP range employee which, given the distance, would occur perhaps once per season. Instead, because of grazing's public controversy and potential expansion of grazing to other areas within the WMA, a replicable monitoring design and commitment for implementation must be a major component of this proposal. Monitoring must incorporate measurable elements to determine if the vegetative community is responding favorably, particularly with noxious weeds. Given differential grazing rates and effects within a pasture, monitoring must incorporate replicable vegetative plots on all vegetative types in each pasture. To compare grazed and ungrazed lands, monitoring must incorporate similar vegetative plots on adjacent lands not within pastures. Monitoring plots and baseline conditions must be established before any grazing commences.

Similarly, both quantitative and qualitative monitoring is needed on private lands proposed for enhancement with this proposal. "General Impression" (p10) is not professional monitoring. Vegetative plots need to be established before grazing begins, and continued throughout the grazing cycles. This should include riparian monitoring in Fred Burr Creek riparian, springs and seeps and other stream courses in pastures, including those within the private pastures.

**Elk and Elk Distribution:** Draft EA Figure 2 diagram shows only winter elk distribution in a single heavy snow year in 2018 as the only example. However, FWP has documented, but failed to display, elk distribution in other years with far fewer elk on private lands. Certainly elk use private lands to some degree, but varies greatly year by year. However, it should be noted that winter elk grazing on private ground occurs on dormant plants capturing dry, cured forage that, aside from litter reduced contribution, has no significant effect on desirable plant vigor or health the following growing season. The rationale for the grazing proposal is described to rest private land, which gives a rancher a substantial benefit, but little or no benefit to public elk. From an elk standpoint, there is little or no benefit to this proposal. Elk in and adjacent to the WMA have ample opportunity to move to find forage conditions satisfactory to their winter survival, even at present 2x "objective" numbers. To our knowledge, Spotted Dog elk are not starving and reproduction is adequate. The proposal also seems to contradict FWP's Elk Management Plan objectives, while on one hand arguing that elk numbers are twice the optimum number, and on the other arguing that grazing SDWMA and private land rest are needed to sustain present elk numbers. The plan would, in effect, negatively affect a multitude of other game and non-game species to sustain elk, which are theoretically overpopulated in the area. Identifying a couple of non-game bird species that would benefit from reduced grass cover is not compelling, and ignores the adverse effect of grazing on the bulk of game and non-game species.

The proposed WMA pastures are described in the EA as spring or fall (page 9) habitat, not winter range. However that would likely depend on the winter conditions. Regardless, while elk may be attracted to a grazed area's regrowth, there is no shortage of transitory spring and fall range on the WMA. Given the SDWMA diversity of elevations, aspects and variety of vegetative types, there is be ample diversity and opportunity for grazing elk in spring and fall. In addition, touting benefits of transitory grazing to keeping

elk off of summer range longer is of dubious benefit to elk, given the plentiful public land summer range habitats.

**Conclusion:** There are many aspects to this proposal that raise serious concerns about proceeding:

- 1) The public sportsmen groups that previously expressed WMA grazing concerns were not notified or invited to view the public land areas to be able to respond with on-the ground knowledge of lands and resources in the proposal.
- 2) There are the narrowest of alternatives proposed, and the proposal design has several factors contributing to likely failure. There are insufficient safeguard stipulations to hold parties accountable or to assure the best possible outcome of this proposal.
- 3) Moving ahead with domestic grazing on public lands where potentially explosive invasive species already have a toehold does not appear to be professionally prudent, and ignores the advice of Hansen (EIHA p154, 162) .
- 4) The real cost from sportsmen-funded programs for a high risk, low return proposal is simply not prudent.
- 5) Reintroducing domestic grazing to riparian areas beginning to recover from a century of grazing does not appear to value the limited quantity and exceptional value of riparian habitats to wildlife species occupying the WMA.
- 6) The proposed monitoring design is grossly insufficient to evaluate effects of this action and instill confidence by sportsmen that their WMA is being optimized.
- 7) This proposal gifts a substantial benefit to a private landowner without significant benefits to public elk or the public. And there is no obligation to provide private land owners opportunities to graze public lands.
- 8) There is no formal requirement that the landowner assure public hunting access is not just limited to relatives, friends or acquaintances, nor is there a net gain in public hunting access.

We respectfully request this proposal be withdrawn. If you choose to move forward with this proposal, to be in compliance with MEPA (EA p25 13f), the concept of domestic livestock grazing on the SDWMA has indeed "generated substantial public controversy" and, as such, warrants preparation of Environmental Impact Statement. In addition, this proposal has foreseeable significant effects if invasive weed species expand as a result of domestic livestock grazing. The impracticality of reducing some persistent invasive species enhanced by livestock grazing and subsequent reduction in wildlife forage would be an irretrievable commitment of resources.

Sincerely,

s/ greg munther

Greg Munther, Conservation Director

Montana Chapter, Backcountry Hunters and Anglers

Rose, Sharon

#13b

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**From:** Arnold, Randy  
**Sent:** Friday, March 22, 2019 7:06 PM  
**To:** Thompson, Michael; Rose, Sharon  
**Subject:** 13b (MT BHA, Munther)--Fwd: SDWMA Comments from MT BHA Attached  
**Attachments:** SDWMA Final.docx

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

**From:** Greg Munther <gmunther12@gmail.com>  
**Date:** 3/22/19 6:59 PM (GMT-07:00)  
**To:** "Arnold, Randy" <rarnold@mt.gov>  
**Subject:** SDWMA Comments from MT BHA Attached

Randy: Am leaving town for awhile so wanted to make sure these got into the system

**Rose, Sharon**

#13c

**From:** Northrup, Rick  
**Sent:** Sunday, March 24, 2019 8:52 PM  
**To:** Golla, Julie; Thompson, Michael; Rose, Sharon; Ritter, Torrey; Johnson, Kelvin  
**Subject:** 13c (MT BHA, Munther)--Fwd: Spotted Dog WMA Grazing  
**Attachments:** SDWMA Final.docx

Please include these comments regarding Spotted Dog grazing proposal.

Rick

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

**From:** Greg Munther <gmunther12@gmail.com>  
**Date:** 3/23/19 5:16 PM (GMT-07:00)  
**To:** "Northrup, Rick" <rnorthrup@mt.gov>  
**Subject:** Spotted Dog WMA Grazing

Rick: Attached are extensive comments from MT BHA on the recent draft EA released proposing grazing on Spotted Dog WMA.

This proposal is poorly conceived and appears to be politically motivated rather than based on WMA resource needs. It is fiscally reckless, designed to have a high potential for failure and likely to expand the already present invasive plant species.

We recommend this proposal be dropped.

Greg Munther

Rose, Sharon

#14

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**From:** Bcarroll2341@msn.com  
**Sent:** Friday, March 22, 2019 10:41 AM  
**To:** Rose, Sharon  
**Subject:** 14 (Carroll)--Public Comment: Proposal to Use Cattle Grazing for Managing Elk Habitat on a Portion of Spotted Dog WMA and Neighboring Private Lands--Draft EA

Name:

City:

I support the PPSA comments on this proposal.

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This e-mail was generated from the 'Proposal to Use Cattle Grazing for Managing Elk Habitat on a Portion of Spotted Dog WMA and Neighboring Private Lands--Draft EA' Public Notice Web Page.

**Rose, Sharon**

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#15

**From:** Steve Platt <splatt4570@gmail.com>  
**Sent:** Friday, March 22, 2019 3:22 PM  
**To:** Rose, Sharon  
**Subject:** 15 (HHAA, Frazier)-- Public Comment on EA for Spotted Dog Grazing  
**Attachments:** HHAAspotteddog319.doc

Dear Sharon,

Attached are comments from Helena Hunters and Anglers.

Thank you,

Best,

Steve Platt  
528 West Lawrence St  
Helena, MT 59601  
406-202-2457



528 West Lawrence Street, Helena, MT 59601

March 22, 2019

Randy Arnold, Region 2 Supervisor  
Montana Fish Wildlife and Parks  
3201 Spurgin Road  
Missoula, MT 59804

RE: Spotted Dog WMA Grazing proposal

Dear Randy,

Helena Hunters and Anglers (HHAA) is a 501C3 organization dedicated to protecting and restoring fish and wildlife to all suitable habitats, and to conserving all natural resources as a public trust, vital to our general welfare. HHAA promotes the highest standards of ethical conduct and sportsmanship, and promotes outdoor recreation opportunity for all citizens to share equally.

***We believe strongly that the purpose of Spotted Dog WMA is first and foremost as wildlife habitat for Montana game and non-game species.***

When the state acquired Spotted Dog WMA (SDWMA) it had been grazed hard for many years; Hanson's 2015 baseline ecological work showed the new WMA to have significant noxious weed issues and degraded riparian habitats. For the first several years in public ownership SDWMA continued to be grazed by cattle as part of the sale agreement. After the cattle were officially removed, trespass grazing continued until perimeter fencing was finished at the end of summer in 2018. The end result of this history is that SPWMA has yet to be "rested" from the effects of decades of heavy cattle grazing. Montana FWP's current grazing proposal is extremely premature at best.

We see little to no benefit to wildlife and Montana sportsmen and women from the proposal. The posited ecological benefits are to the private landowner who will rest his own land while his cows graze SDWMA for free. The range science behind the current proposal is superficial. We are unconvinced that Montana FWP has laid out a rigorous vegetation monitoring regime to assess the real costs and or benefits of the grazing experiment once it is implemented.

Specific issues:

1) There is no number given for the number of cow/calf pairs that will graze SDWMA. What guarantee is there that the McQueary Ranch won't simply increase the stocking rates on their own ground once their cows are grazing SDWMA?

2) We understand that Montana sportsmen will bear the cost of approximately \$10,000 for fencing within the SDWMA in order to maintain livestock in the intended area. We suggest that a better use of that \$10,000 would be to put it toward noxious weed spraying on SDWMA. We note that Montana FWP administrative costs are not included in this figure.

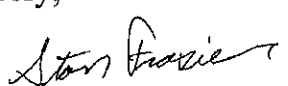
3) The range of alternatives is minimal. That the "no action alternative" will somehow cause elk to use the WMA *less* than if grazed by cattle is simply not credible.

4) We believe that using elk location data from one hard winter (2018) is a poor excuse for implementing this grazing plan.

5) Public hunters will see no additional access to the SDWMA through the McQueary Ranch. If one intention of the project is to trade grass for access, the McQueary Ranch must be enrolled in block management wherein public hunters (without a relationship to the family) are accorded equal access to hunt.

We respectfully ask Montana FWP to withdraw the proposal.

Sincerely,



President, Helena Hunters and Anglers Association



Rose, Sharon

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#16

**From:** Ben Deeble <bddeeble@gmail.com>  
**Sent:** Sunday, March 24, 2019 2:47 PM  
**To:** Rose, Sharon; Arnold, Randy  
**Cc:** Jay Gore; Bob Jeffrey; Glenn Marangelo; Tom Deveny; Todd Cross  
**Subject:** 16 (BSUBA, Deeble)--Comment on Spotted Dog Cattle Grazing proposed decision  
**Attachments:** Comments\_SpottedDog\_grazing\_final.pdf

Dear Sharon and Randy:

See our comments attached.

Regards,  
Ben Deeble  
Big Sky Upland Bird Association  
Missoula  
c.406-327-9939

#16

March 24, 2019

TO: Randy Arnold, Regional Supervisor, Sharon Rose, FWP Region 2, Missoula

**RE: Comments on "A Proposal to Use Cattle Grazing for Managing Elk Habitat on Spotted Dog WMA"  
Proposed Grazing Decision**

Dear Mr. Arnold, and Montana Fish, Wildlife and Parks:

The Big Sky Upland Bird Association (BSUBA) has been organized for over 30 years as a non-profit organization in Montana dedicated to habitat conservation and hunting opportunity for all upland game bird species in the state. We are supportive of MDFWP's stated goals of managing habitat of the Spotted Dog WMA (SDWMA) for the benefit of wildlife, habitat and species diversity, and wildlife related recreation. At nearly 60 square miles, the SDWMA has the potential to provide high quality hunting for a variety of species, and a significant number of hunter-use-days. It should be anticipated that the region's upland bird hunters will use the property extensively.

Our Association provided a variety of written comments in December 2017 on the Spotted Dog management plan. We commented that there was only very limited discussion of the upland bird species of the SDWMA, and no measures explicitly designed to conserve or enhance upland gamebird habitats, populations, or hunting opportunities. We found this a significant oversight given that upland birds such as Ruffed Grouse, Dusky Grouse, Merriam Turkey, Gray Partridge, and potentially Sharp-tailed Grouse, could use and thrive on this important tract of intermountain grassland and forest habitat.

We commented that regarding habitat, all grouse species would benefit from management to enhance aspen stands and shrub such as willow, birch, chokecherry, rose and serviceberry. Dusky grouse and turkey would benefit from management for some old growth Douglas fir and Ponderosa pine for winter and roosting habitats, and all upland bird species would benefit from careful management of wet seeps and springs, creeks and pond banks. As ground nesters, all upland game birds would benefit from management for residual native grass cover, habitat features influenced by both elk population objectives and livestock grazing intensities and timing.

Our 2017 comments appear to have been entirely disregarded in the final management plan. We hope the disregard for upland bird habitats in the management plant won't carry into this cattle grazing decision, but we are concerned based on the draft that it will.

For example, the only reference to upland birds in the 58 page grazing document is one sentence *"There are few game bird species affected by the proposed action, but the grazing system is expected to cause either no change to ground-nesting birds or provide benefits through greater structural diversity of grasslands that provides a variety of options for foraging, nesting, and brood-rearing."*

Two of the only avian species named in the grazing document are Brown-headed Cowbird and Long-billed Curlew. The former is an aggressive nest parasite of a large variety passerine birds, and will be largely negative to the reproduction of most non-game bird life on the SDWMA

/

(over 140 host species of the Brown-headed Cowbird have been described, from birds as small as kinglets to as large as meadowlarks) if cattle increase Cowbird densities. Long-billed Curlews are perhaps not coincidentally a species associated with vegetation heights of only 4 to 12 inches, heavily grazed habitats, and sometimes even exotic grass dominated sites such as cheatgrass stands. To single out the habitat preferences of Long-billed Curlew to illustrate the benefits cattle grazing can provide to "structural diversity" for native wildlife seems to ignore the many other species that won't benefit from heavily grazed mid-elevation bunchgrass and native shrub communities.

We certainly don't hold blanket opposition to livestock grazing, as it can be highly compatible with some wildlife, and provides clear economic benefits to rural communities, helping to maintain undeveloped landscapes. Some of the proposed grazing infrastructure of the draft such as seasonal electric fence is even preferable to permanent fencing from the standpoint of effects on wildlife, with the qualification that electric fence needs to be monitored almost daily to verify proper function. However, the present reality is that mid or low elevation grassland habitats ungrazed by livestock are certainly in shorter supply to wildlife than annually rotated or intensively grazed habitats in the Deer Lodge Valley. Thus suggesting that cattle need to graze SDWMA bunchgrass habitat to create and provide otherwise scarce local habitat conditions for wildlife lacks supporting quantification or analysis.

There may also be budgetary benefits to defining and working towards achieving habitat objectives for upland birds on the SDWMA. For example, habitat enhancement projects which benefit upland birds on the SDWMA could potentially be funded with monies from FWP's Upland Game Bird Habitat Enhancement Act, a substantial pool of funds generated by the sale of upland bird hunting licenses. The funds can only be used on properties available to the public for upland bird hunting, and could even be available to adjoining private lands with this proviso. Under the contemplated draft decision, will the adjoining landowner(s) allow upland bird hunting?

Clearly any final habitat management plan and grazing decisions for the SDWMA would benefit from expanded evaluation and discussion of upland bird habitats, populations, and management direction compatible with maintaining and enhancing habitats and hunting opportunity for upland birds and other game species. It may require preparation of an environmental impact statement to analyze the issues more fully and settle public controversies that are emerging related to the grazing proposal before a final decision can be made.

Sincerely,



Ben Deeble, president

Big Sky Upland Bird Association, POB 9005, Missoula, MT 59807-9005

Rose, Sharon

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#17

**From:** Darlene Horne <mules2ride@msn.com>  
**Sent:** Monday, March 25, 2019 8:22 AM  
**To:** Rose, Sharon  
**Subject:** 17 (LCBCH, Horne)--comment on Spotted Dog Proposed Grazing  
**Attachments:** Response to Spotted Dog grazing issue.docx

Please find attached my response to the Spotted Dog Proposed Grazing issue.

Thank you for your time,

Neil Horne  
419 Mill Road  
Helena, Mt. 59602  
406-431-0130  
[mules2ride@msn.com](mailto:mules2ride@msn.com)

Thursday, March 25, 2019

#17



Montana Fish, Wildlife and Parks

Re: Spotted Dog Wildlife Management Area  
proposed cooperative grazing system

I have been a member of the Spotted Dog WMA working group since day 1 and I will admit at times it was a little frustrating to attend meeting after meeting that would start out with grazing or end up with grazing on the WMA. I was dead set against any grazing on the WMA but, after listening to Chase Hibbard and talking to many individuals that are a lot smarter than I am when it comes to the subject of grazing, I have somewhat changed my mind.

I have read the draft environmental assessment dated February 26, 2019 from cover to cover. A tremendous amount of time and research has been put into creating this document. It seems to me that the proper checks and balances are in place, as long as both FWP and the McQueary Ranch are in full agreement of all provisions. I think we should move forward.

There is one exception, which is hunter access. I really don't care how many hunter days the McQueary Ranch allows on their property, the most important concern to me, is to have access to the Spotted Dog Wildlife Management Area thru, the McQueary Ranch. To me that would be the ultimate deal maker providing, it can be worked out. If you remember we lost our south west trailhead when Rock Creek Cattle purchased the Sam Beck property. I don't believe you would have any organization or hunter group opposed to rest rotation grazing, as presented, if access would be allowed to the SDWMA.

Our Back Country Horsemen mission reads:

**OUR PURPOSE;** To perpetuate the common sense use and enjoyment of horses in America's back country and wilderness. **To work to ensure that public lands remain open to recreational stock use. To assist various agencies responsible for the maintenance and management of public lands.** To educate, encourage, and solicit active participation in the wise and sustained use of the back country resource by horsemen and the general public, commensurate with our heritage. Foster and encourage formation of new Back Country Horsemen organizations

Thank you for your time.

Neil Horne

419 Mill Road –

Helena, Mt. 59602

Past Present of Last Chance Back Country Horsemen

President of Prickly Pear Sportsmen's Association

Active member of Spotted Dog WMA working group.

This letter is endorsed by LC BCH members (approx. 50) and PPSA Board representing approx 1800 members, Mile High Back Country Horsemen and others BCH clubs pending.

Rose, Sharon

#18

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**From:** hkimerly1@comcast.net  
**Sent:** Monday, March 25, 2019 3:36 PM  
**To:** Rose, Sharon  
**Subject:** 18 (anon 1)--Public Comment: Proposal to Use Cattle Grazing for Managing Elk Habitat on a Portion of Spotted Dog WMA and Neighboring Private Lands--Draft EA

Name:

City: Helena

Please receive this as my no vote for cattle grazing on SDWMA. When can we expect a small portion of montana can be left to the wild life management. Maybe some one/some day can point to me an area where cattle grazing is well managed on public lands and gives wild life a chance to thrive.

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This e-mail was generated from the 'Proposal to Use Cattle Grazing for Managing Elk Habitat on a Portion of Spotted Dog WMA and Neighboring Private Lands--Draft EA' Public Notice Web Page.

**From:** pdriscoll2@mt.gov  
**Sent:** Monday, March 25, 2019 5:41 PM  
**To:** Rose, Sharon  
**Subject:** 19 (Driscoll)--Public Comment: Proposal to Use Cattle Grazing for Managing Elk Habitat on a Portion of Spotted Dog WMA and Neighboring Private Lands--Draft EA

Name: Paul J. Driscoll

City: Clancy

This proposal would seem to be short-sighted in a number of respects. As the EA notes, livestock trespass has been an issue since the formal grazing arrangement was curtailed. Fish, Wildlife & Parks offers here an unusual solution to trespass grazing -- permission. Admittedly, under certain conditions, livestock grazing can improve range health. However, the Spotted Dog was not purchased to conduct any such an experiment and it should not be considered for one now with the entire rest of the Deerlodge-Beaverhead National Forest available. Range lands on the Spotted Dog WMA warrant a much longer period without livestock grazing before even considering such a proposal. In these five seasons since suspension of Rock Creek grazing we have witnessed a few heavy winters that pressured elk off the WMA. I have found elk antlers on the Spotted Dog proper, however, and believe that most years will see significant numbers overwintering on the WMA. Further, we have not witnessed several drought years in succession nor have we seen a single major grasshopper outbreak or wildfire on the WMA. These conditions are known to influence plant diversity and succession. A twenty-year moratorium on any livestock grazing would offer range scientists a good data set of how the Spotted Dog might more naturally rollover among the various annuals and perennials, grasses, forbs, and shrubs. Additionally, the proposed EA does nothing to improve hunter access to the WMA. Rather, the contentious historic county roadway through the Spotted Dog is shrugged off as "closed to public access in recent decades." Hunter and recreational access is notably poor from the southern boundary and I suspect the hunter days cited is mainly comprised of a closed contingent authorized by McQueary Ranch. Was a Block Management Area even under consideration as part of this EA? I urge better perimeter fencing to reduce livestock trespass, a twenty-year moratorium on any form of cattle grazing on the Spotted Dog, and further study, particularly of non-game species and the full spectrum of range flora species.

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This e-mail was generated from the 'Proposal to Use Cattle Grazing for Managing Elk Habitat on a Portion of Spotted Dog WMA and Neighboring Private Lands--Draft EA' Public Notice Web Page.

**Rose, Sharon**

#20a

**From:** Stan Frasier <sfrasier@mt.net>  
**Sent:** Tuesday, March 26, 2019 12:10 PM  
**To:** Rose, Sharon  
**Subject:** 20a (Frazier)--Spotted Dog Grazing Proposal

Stan Frasier  
PO Box 5841, Helena, 59604  
406 439 2705

Comments on Proposal to Use Cattle Grazing on Spotted Dog WMA.

The only reasonable alternative is, Alternative A: NO ACTION NO LATE HUNTS NO TRAPPING

The idea that cattle grazing should be used for managing elk habitat on any WMA is nuts!

The statement on page 25 that, "the scientific rationale for this project is well-founded and the benefits of carefully controlled livestock grazing to game and nongame wildlife are well documented", I believe to be based on sloppy science. I have been told by the former Refuge manager that the study this theory is based on only applies to one species of grass for a limited time. Although this rationale is often cited to justify public land grazing it certainly defies logic and needs to be reexamined. The simplest way to do this would be to establish a control plot with no livestock grazing. Spotted Dog WMA provides an excellent opportunity for this test. SDWMA has been abused by cattle for 70 years and now we have the Hansen vegetative survey to establish a baseline. Keep cattle off SDWMA for 10 years and then redo the vegetative survey. We would then have a good example of what a landscape could look like without grazing. It could take 50 years for this land to recover from past abuse.

Livestock grazing creates weed problems, damages riparian areas and streams and degrades wildlife habitat. With no grazing there would be no need for interior fencing, no need to fence riparian areas, no need to do intensive management to "limit" livestock damage.

The idea of using grazing as a tool to manage wildlife is akin to using a three pound hammer to do watch repair. Cattle grazing is not a tool, it is a problem.

Cattle need grass, grass does not need cattle.

Stan Frasier



**Rose, Sharon**

#206

**From:** sfrasier@mt.net  
**Sent:** Tuesday, March 26, 2019 12:16 PM  
**To:** Rose, Sharon  
**Subject:** 20b (Frasier)--Public Comment: Proposal to Use Cattle Grazing for Managing Elk Habitat on a Portion of Spotted Dog WMA and Neighboring Private Lands--Draft EA

Name: STAN FRASIER  
City: Helena  
Stan Frasier  
PO Box 5841, Helena, 59604  
406 439 2705

Comments on Proposal to Use Cattle Grazing on Spotted Dog WMA.

The only reasonable alternative is, Alternative A: NO ACTION  
NO LATE HUNTS  
NO TRAPPING

The idea that cattle grazing should be used for managing elk habitat on any WMA is nuts!  
The statement on page 25 that, 'the scientific rationale for this project is well-founded and the benefits of carefully controlled livestock grazing to game and nongame wildlife are well documented', I believe to be based on sloppy science. I have been told by the former Refuge manager that the study this theory is based on only applies to one species of grass for a limited time. Although this rationale is often cited to justify public land grazing it certainly defies logic and needs to be reexamined. The simplest way to do this would be to establish a control plot with no livestock grazing. Spotted Dog WMA provides an excellent opportunity for this test. SDWMA has been abused by cattle for 70 years and now we have the Hansen vegetative survey to establish a baseline. Keep cattle off SDWMA for 10 years and then redo the vegetative survey. We would then have a good example of what a landscape could look like without grazing. It could take 50 years for this land to recover from past abuse.  
Livestock grazing creates weed problems, damages riparian areas and streams and degrades wildlife habitat. With no grazing there would be no need for interior fencing, no need to fence riparian areas, no need to do intensive management to 'limit' livestock damage.  
The idea of using grazing as a tool to manage wildlife is akin to using a three pound hammer to do watch repair. Cattle grazing is not a tool, it is a problem.  
Cattle need grass, grass does not need cattle.

Stan Frasier

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This e-mail was generated from the 'Proposal to Use Cattle Grazing for Managing Elk Habitat on a Portion of Spotted Dog WMA and Neighboring Private Lands--Draft EA' Public Notice Web Page.

**From:** garrett ouldhouse <oretgart@gmail.com>  
**Sent:** Tuesday, March 26, 2019 11:30 PM  
**To:** Rose, Sharon  
**Subject:** 21 (ASC, Ouldhouse)--Spotted Dog

Randy Arnold, Regional Supervisor

Please accept the following comments on behalf of the Anaconda Sportsmens's Club as our response to the Draft EA regarding the proposal to graze parts of the Spotted Dog WMA.

Overall we find the analysis in this EA severely lacking in both broad and detailed facts required for a valid evaluation. We don't know the stocking rate of the Livestock. Are there any limits on the number of Elk allowed on the Private land? Are the Mule Deer included? How will Elk access this private land grazing when they are being hunted until mid February? How long will Elk be allowed to stay on private land in Spring? How are conflicts with Livestock feeding areas and nearby wintering Elk to be resolved.

From an economic standpoint this seems to be an exchange of Livestock summer grazing on Public Lands for elk grazing on private land in Winter and Spring. We support the concept and have a History of supporting similar agreements. Hunters will be investing a significant amount to make sure this works. There needs to be a complete analysis of all these costs including maintenance, monitoring and payments to DNRC by FWP for grazing which will be used by livestock. This grass exchange may be agreeable but we need to the complete economic values being exchanged, the complete costs to FWP. These are our license dollars and we expect an accounting.

Monitoring of Livestock grazing seems to be trivialized. We are not convinced that an electric fence will do the job without continual monitoring. What are the requirements to return Livestock to the required pasture when fencing falls? Whose responsibility's is it? If problems persist, what are the remedies, penalties?

Riparian areas are crucial and limited on the entire WMA. They are only beginning to recover from years of abuse. The risks to these areas from the proposed grazing are substantial and there are insufficient safeguards and oversight to insure continuing recovery for these sights.

The EIHA report detailed the WMA in need of long term rest from Livestock gazing. Some portions should never be grazed. Some require decades to recover. A minimum of 5 years rest was recommended for all WMA. During the past 5 years trespass Cattle have been a continuing problem on the WMA, preventing a full recovery of native vegetation on the WMA. The last major boundary fence was completed in 2018 yet trespass grazing continues. The WMA at best has had less than one year of complete rest from Livestock.

Before we can enter into any grazing agreement we need a review of this portion of the WMA by EIHA to determine if grazing on this pasture is appropriate. We need factual data that proves this area is recovered and capable of supporting livestock and still providing the expected benefits for Wildlife. What are the impacts to other Wildlife dependent on the WMA?

EHIA also documented significant weed problems on the WMA including the lands in question. How will livestock impact invasive weeds? Will McQueary provide required weed management? What are the long term plans for management and eradication of weeds.

Test vegetative plots need to b established on the WMA so we can verify impacts on vegetation and weed control.

21

We are satisfied with the landowner access provided for Public hunting on the McQueary property. It seems that additional public access to the WMA could increase Elk harvest on the WMA. We would request that FWP pursue opportunities for additional access to the WMA through the McQueary property.

FWP says they have been pursuing grazing opportunities on the WMA for more than a year. Why did you pursue those opportunities before you were satisfied that you had a landscape that had recovered to a point to make those opportunities viable. Why did you wait until the release of the EA to engage public groups who are the reason we even have a WMA? Why was Spotted Dog Working Group not involved in this proposal? Why were we given a presentation only a week before the deadline to comment?

We know State Auditor Rosendale ended a proposed purchase of the DNRC lands in the WMA until the FWP provided a plan mandating both grazing and logging on the WMA. We also have seen legislation the Montana House Representative Pierce introducing requiring landowner oversight of FWP's winter counts of wildlife in this hunting area. We don't intend to debate those activities here, but it demonstrates the political pressure being applied for commodity production and oversight of wildlife management on our WMA. We would be naive to not suspect that this proposal and its possible implementation are being influenced by politics. We are not naive.

FWP's primary management responsibility for any WMA is to support the critical needs of native wildlife. When FWP proposed hunting elk on the WMA through a major portion of the winter season we lost confidence in FWP's ability to be a trustee for this resource. Traditionally WMAs are closed to all human activity from December 1st through May 15th. We support those restrictions and are shocked by FWP abandoning them without any consultation. Was any analysis done on the impacts to other wildlife depending on the WMA? Mule Deer populations are in significant decline and would certainly be stressed by elk hunters in winter months.

We request this proposal be withdrawn. If FWP believes portions of the WMA have recovered to the point that livestock use is appropriate then we request EIHA be engaged to evaluate the landscape and confirm those conditions. With that confirmation we could support evaluations of opportunities for livestock use which would improve the viability and productivity wildlife habitat throughout this landscape, public and private. The overall availability of those wildlife to the general public needs to be apart of the evaluation.

If you chose to move forward with this proposal then we believe there are sufficient conflicts and the public engagement to warrant an Environmental Impact Statement.

Gary Ouldhouse Anaconda Sportsmen's Club President

**From:** cmcqueary@mt.gov  
**Sent:** Wednesday, March 27, 2019 7:37 AM  
**To:** Rose, Sharon  
**Subject:** 22 (McQueary)--Public Comment: Proposal to Use Cattle Grazing for Managing Elk Habitat on a Portion of Spotted Dog WMA and Neighboring Private Lands--Draft EA

Name: Cam McQueary  
City: Deer Lodge

This letter is to communicate my complete agreement and support in utilizing the Spotted Dog Wildlife Management Area (SDWMA) for cattle grazing. I have both hunted the north sections of area 215 and been a part of the McQueary Ranch operation for over 20 years and have seen firsthand the hardship caused to area landowners from the over abundant elk population and lack of winter range on the SDWMA.

In recent years, the inadequate cattle grazing on the SDWMA has created fewer grazing areas for elk to habitat since elk will typically only forage areas where new growth occurs. I believe cattle grazing on the SDWMA will not only support the McQueary Ranch but will promote new growth and more grass availability for elk grazing areas in the summer, fall, and most importantly, winter and early spring. There appears to be a misconception that there are over 40,000 acres of winter grazing availability for the elk when, realistically, there are likely 10,000 acres or less with only 25% of being utilized by the elk.

Currently, there are limited areas where elk are seen grazing in the fall and early winter (Jake Creek, Freeze Out, and O'Neil Creek areas). During late winter, this becomes problematic with the overpopulated elk herds as by this time, the elk have eaten themselves out of house and home and do not have enough winter range to survive. The elk herds then migrate onto the McQueary Ranch to graze resulting in lost use of summer pasture, destroyed haystacks and fences, and disruption to calving operations causing stress on cattle herds and loss of calves. That said, the landowner endures a significant financial loss of up to \$20,000 per year due to this elk activity. It is unlikely that many members of the public would give up a this large of a piece of their own salary to feed these elk with nothing in return the way the landowners do. Grazing would allow some compensation back to the McQueary Ranch for their annual financial losses.

Grazing will also promote the vegetation to reestablish itself, which will benefit habitat for all the wildlife that call SDWMA their home. Right now, the vegetation is over grown, smothering itself out, and creating a fire danger. The SDWMA is a spark or lighting strike away from significant fire activity which would include their neighboring land owners. Management and attention to this area is crucial, before it is too late.

It is obvious the McQueary Ranch has been more than accommodating by allowing several hunters annually on their land and attempting to tolerate the copious numbers elk using their land for winter range. The use of the SDWMA area for cattle grazing would be a step in the right direction to help alleviate these problems and would back the FWP's statement they have stood behind in that they want to do the right thing to be a good neighbor.

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This e-mail was generated from the 'Proposal to Use Cattle Grazing for Managing Elk Habitat on a Portion of Spotted Dog WMA and Neighboring Private Lands--Draft EA' Public Notice Web Page.

Rose, Sharon

#23

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**From:** Swant, Jason  
**Sent:** Wednesday, March 27, 2019 12:49 PM  
**To:** Rose, Sharon  
**Subject:** 23 (PPSA, Swant)--EA for FWP Cooperative Grazing On Spotted Dog WMA - Comments  
**Attachments:** EA Spotted Dog WMA - PPSA Comments.pdf

Hi Sharon,

The Prickly Pear Sportsmen's Association has these questions and comments for the EA for the Cooperative Grazing on the Spotted Dog WMA proposal. Would you like me to submit these through the comments page on the website also?

Jason Swant

Tuesday, March 19, 2019

Montana Fish, Wildlife and Parks

The Prickly Pear Sportsmen's Association (PPSA), represents over 1800 members from the sporting community. The PPSA is pleased to have had its Board Chairman, Jason Swant, participate in the Spotted Dog WMA Working Group since 2013.

The PPSA recognizes Fish, Wildlife & Parks (FWP) for its work to create and maintain the Spotted Dog WMA. The PPSA sees this and similar efforts as an important part of maintaining Montana's wild life populations and continuing the hunting heritage that is so important to PPSA members.

Based on the PPSA's hunting heritage values and participation in the Spotted Dog WMA Working Group the PPSA offers the following questions and comments for FWP's environmental assessment proposal to implement an exchange-of-use cooperative grazing system on the Spotted Dog WMA.

Q1 Why is FWP proposing a cooperative grazing agreement with a Southwest bordering land owner without securing a public access point to the Southwest portion of the Spotted Dog WMA?

PPSA Comment: Currently there is not a public access to the Southwest portion of the WMA. The McQueary Ranch has extensive continuous boarder to the Southwest portion of the WMA. Roads exist to provide access through the McQueary Ranch but are only available by permission of the McQueary Ranch. It is reasonable that the McQueary Ranch could make access to the Southwest portion of the WMA available as part of a cooperative grazing agreement. FWP should not enter a cooperative grazing exchange with a bordering neighbor that does not include providing public access to the WMA.

Q2 What constitutes a hunter-day of public access?

PPSA Comment: This term is confusing. Does it mean 24 hours of hunting by one hunter over 3 or 4 days? If a hunter can hunt for just an hour or two is that be a hunter day? Hunter-day and public access should be separate terms. A hunter-day should mean one hunter one day of hunting. Public access should mean any member of the public has an opportunity to access the property for hunting.

During the Spotted Dog WMA Working Group meetings Mr. McQueary described maintaining a list of hunters (family, friends & business associates) who he allows to hunt the McQueary Ranch. He often referred to this as public hunting. The PPSA does not believe this constitutes public hunting.

Private lands enrolled in the FWP Block Management Program certainly constitute public hunting. The PPSA feels enrolment in block management programs would be a good standard for meeting FWP's requirement that the landowner allows hunting sufficient to prevent elk from congregating on their property and contributing to the harvest prescribed by FWP. The Block Management Program creates hunting opportunity and informs the public hunter of the opportunity. Some block management units require permission, others require sign in for hunting and others don't require any action for access. Regardless, the Block Management Program participation easily establishes that a landowner cooperates with public hunting within the confines of the Block Management Program.

Q3 How was 150 hunter-days of public access determined to be determined sufficient to prevent Elk from concentrating on the McQueary Ranch or to be a contribution to the overall harvest prescribed by FWP?

PPSA Comment: The EA states that the McQueary Ranch would commit to allowing at least 150 hunter-days of public access annually through the general hunting season, as has been their custom. If 150 days has been the McQueary Ranch custom this cooperative grazing agreement does nothing to increase access for the effective harvest of elk from the McQueary Ranch or the WMA.

During the general hunting seasons, archery & rifle there are roughly 90 days. The shoulder seasons add about 95 days for hunting. In total about 185 days for hunting across the combined seasons. The McQueary Ranch offer of 150 hunter-days of public access is severely low provided the hunting opportunities of the McQueary Ranch and opportunities created by increased access to the Spotted Dog WMA. How can less than one hunter-day of public access per day of the hunting seasons be considered as the land owner allowing hunting sufficient to prevent elk from concentrating or contributing to the overall harvest prescribed by FWP? The PPSA feels that the number of hunter days of public access needs to be increased.



Jason G. Swant, Board Chair, Prickly Pear Sportsman's Association

Rose, Sharon

#24

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**From:** chasbuehler@aol.com  
**Sent:** Wednesday, March 27, 2019 9:05 PM  
**To:** Rose, Sharon  
**Subject:** 24 (SS, Buehler)--Spotted Dog

Skyline Sportsmen of Butte support FW&P "proposal to use Cattle Grazing for Managing Elk Habitat on a Portion of Spotted Dog WMA

and Neighboring Private Lands". We think SDWMA should be managed to the benefit of wildlife both financially and habitat wise. We

would prefer working with landowners who allow hunting.

Chuck Buehler

Secretary Skyline Sportsmen



Rose, Sharon

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# 25  
# 26

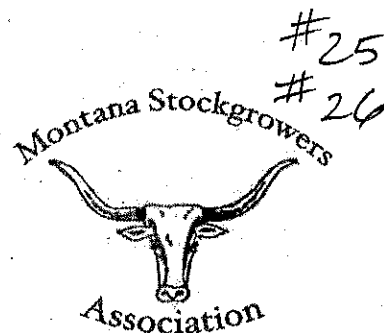
**From:** Brian Ohs <brian@mtbeef.org>  
**Sent:** Thursday, March 28, 2019 12:14 PM  
**To:** Rose, Sharon  
**Cc:** Kori Anderson  
**Subject:** 25 (MSG, Ohs), 26 (MPLC, Ohs)--Spotted Dog WMA 2019 Grazing Comments  
**Attachments:** Spotted Dog WMA Grazing.pdf

Hello Sharon,

Please accept this attachment as public comment from Montana Stockgrowers Association.

Thank you,

Brian Ohs | Director of Natural Resources  
Montana Stockgrowers Association | Montana Association  
of State Grazing Districts | Montana Public Lands Council  
406.442.3420 | brian@mtbeef.org



March 28, 2019

Randy Arnold, Regional Supervisor  
Montana Fish, Wildlife and Parks  
Region 2  
3201 Spurgin Road  
Missoula, MT 59804

Dear Mr. Arnold

On behalf of the Montana Stockgrowers Association (MSGA) and the Montana Public Lands Council (MPLC), we are submitting this letter to support the proposal for utilizing cattle grazing on the Spotted Dog Wildlife Management Area.

Since 1884, MSGA and MPLC have been dedicated to finding proactive solutions for Montana's ranching communities and people. Montana ranchers have long been responsible, environmentally conscious land stewards in partnership with our state and federal agencies. In turn, these land partnerships have created excellent opportunities for rural agriculture and contributed to our local economies as well as help provide healthy wildlife habitat.

Our organizations have historically supported multiple use strategies on our public lands and have worked hard to improve the resource. Areas that have been inventoried Wildlife Management Areas (WMA) create unique management challenges. These areas limit certain practices and can inhibit proper vegetation management as well as controlling noxious weeds.

MSGA and MPLC also encourage further expansion of cooperative grazing systems and will continue to support MFWP efforts to incorporate neighboring private lands and multiple use management as a tool for Wildlife Management Areas.

Thank you for your time and consideration on this important issue.

Sincerely,

A handwritten signature in black ink, appearing to read "BOH", with a horizontal line extending to the right.

Brian Ohs  
Director of Natural Resources  
MSGA, MPLC

Rose, Sharon

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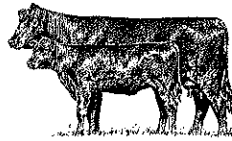
#27

**From:** Abigail St. Lawrence <abigail.stlawrence@gmail.com>  
**Sent:** Thursday, March 28, 2019 2:47 PM  
**To:** Rose, Sharon  
**Cc:** Dan Conn  
**Subject:** 27 (RMSGGA, Conn)--SDWMA DEA comments  
**Attachments:** 190328 FWP SDWMA comments.pdf

Please find attached comments of the Rocky Mountain Stockgrowers Association on the draft environmental assessment for the Montana Fish, Wildlife and Park proposal to implement an exchange-of-use cooperative grazing system on the Spotted Dog Wildlife Management Area and adjacent private land in Powell County, Montana. Would you please confirm receipt of the attached comments via return email? Thank you.

Abigail St. Lawrence  
Attorney at Law  
(406) 431-9032  
PO Box 2019  
Helena, MT 59624

This message may contain confidential privileged material, including attorney-client communications and attorney work product. This electronic transmission does not constitute a waiver of privilege. Please contact sender immediately if you have received this message in error. Thank you.



RMSGGA  
PO Box 365  
Avon, MT 59713  
Dan Conn – President  
(406) 360-6858

March 28, 2019

Montana Department of Fish, Wildlife, and Parks  
Region 2 Headquarters  
3201 Spurgin Road  
Missoula, MT 59804

Via email: [shrose@mt.gov](mailto:shrose@mt.gov)

**Re: Draft Environmental Assessment, Spotted Dog Wildlife Management Area**

To Whom It May Concern:

Thank you for the opportunity to provide comment on the draft environmental assessment (“DEA”) for the Montana Fish, Wildlife and Parks proposal to implement an exchange-of-use cooperative grazing system on the Spotted Dog Wildlife Management Area (“SDWMA”) and adjacent private lands in Powell County northeast of Deer Lodge, Montana. The following comments are submitted on behalf of Rocky Mountain Stockgrowers Association, which is a grassroots organization of family ranches and supportive businesses and individuals in Powell, Deer Lodge, and Granite Counties, but with membership statewide. These comments have been prepared in consultation with ranchers who work the rangeland adjacent to the SDWMA on a daily basis and have education and life experience in range management.

It has been shown that elk prefer to graze in areas that have been previously grazed by cattle. Cows eat the coarse, dense stands of forage, removing it from the landscape. With the heavy cover removed, new, tender, succulent shoots of grass begin to grow, which elk much prefer.

The areas proposed to be grazed in the SDWMA that are the subject of the DEA are heavily foraged and seldom have elk spending any amount of time on them. Elk move across the proposed grazing areas from one side of the SDWMA to the other, but spend minimal time there. Cattle grazing in these areas should create zones of prime elk grazing, thereby creating new range for and drawing elk into these previously underutilized areas. With more new attractive range inside the SDWMA, more elk should stay on the SDWMA rather than moving down to the adjacent private lands.

The grazing system proposed in the DEA would provide some relief for the nearby landowners who bear the brunt of the impacts from elk trespassing from the SDWMA onto private property, while also resulting in the public achieving access to public elk on public property. The area included in the grazing

system experiment is quite small—one to two percent of the total SDWMA acreage per year, with significant periods of rest in between grazing periods. Approximately eight percent of the SDWMA would be part of the study in total—hardly enough to negatively impact the SDWMA. Additionally, 2,100 acres of private property will be rested every year, which will also provide additional elk habitat. Finally, these areas are not considered to be winter range for elk, so livestock grazing these areas would not impact elk in winter months. If successful, the grazing system proposed in the DEA could be used as a model for elk refuges and wildlife management areas across Montana, getting more elk to remain on public land, mitigating elk forage depredation on private property, and opening up additional grazing resources for cooperating producers.

Thank you again for the opportunity to submit comments on the DEA. If you have any questions, please do not hesitate to contact me. For future actions related to SDWMA, please add Rocky Mountain Stockgrowers Association to the mailing list using the address above, as well as our attorney, Abigail St. Lawrence, who may be reached at PO Box 2019, Helena, MT 59624.

Sincerely,

*Dan Conn*

Dan Conn, President  
Rocky Mountain Stockgrowers Association

Rose, Sharon

#28

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**From:** Adam Shaw <a.michaelshaw@gmail.com>  
**Sent:** Thursday, March 28, 2019 3:13 PM  
**To:** Rose, Sharon; fwpcomm@mt.gov  
**Subject:** 28 (HHA, Shaw)--Hellgate Hunters & Anglers Comments on Spotted Dog WMA Livestock Grazing Proposal  
**Attachments:** 2019-03-28 HHA SD Grazing Exchange Comments.pdf

FWP,  
Please find Hellgate Hunters & Anglers' comments for the Spotted Dog WMA Livestock Grazing Proposal attached hereto.

Thank you,

Adam Shaw

--  
I fish, not because I regard fishing as being so terribly important, but because I suspect that so many of the other concerns of men are equally unimportant and not nearly so much fun."  
— Robert Traver



P.O. BOX 7792 MISSOULA, MT 59807 (406) 241-3121  
[www.hellgatehuntersandanglers.org](http://www.hellgatehuntersandanglers.org)

Randy Arnold  
MT FWP Region 2 Headquarters  
3201 Spurgin Road  
Missoula, MT 59804

RE: Spotted Dog WMA Livestock Grazing Proposal

Dear Randy,

Thank you for the opportunity to comment on FWP's proposal to "Use Cattle Grazing for Managing Elk Habitat on a Portion of the Spotted Dog Wildlife Management Area and Neighboring Private Lands". Hellgate Hunters and Anglers is an all-volunteer, local rod and gun club in Missoula with over 400 members and supporters. Many of our members hunt on Spotted Dog and board members of HHA have been engaged and interested in the future management of the WMA since it was purchased in 2010. We have previously submitted comments to FWP regarding our concerns towards permitted livestock grazing on the WMA.

The following comments outline the concerns of HHA and the proposed action:

**Timing**

The WMA has been grazed historically for nearly a century. According to the monitoring assessment completed by Hansen et al. in 2015, many portions of the WMA have yet to fully recover. The open prairie, shortgrass ecosystem that dominates the WMA is unique to western Montana and is important for a myriad of species. This proposal begs the question, why now? We do not believe that FWP should be rushing into permitting livestock grazing when at the same time, the Department has just finally completed perimeter fencing to keep trespass cattle out of the WMA. There is no rush to push this type of proposal out the door, especially when sportsmen organizations have not been previously consulted or have had an opportunity to tour the site. This proposal leaves many stones unturned and many questions to be answered.

While we appreciate that the Spotted Dog Working Group advocated for livestock grazing to be permitted on the WMA, the Working Group largely represents local landowners and ranchers in the Deer Lodge Valley and is not representative of all interested parties and additionally, does not have decision-making authority. The WMA is managed by FWP for the benefit of wildlife and we feel this proposal skews that balance.

### Lack of Alternatives in the EA

We found the lack of alternatives in the EA troubling—no alternative grazing schedules, alternate pastures, fencing options to protect riparian areas, a non-private land grazing exchange option, a grazing fee option, etc. The EA does not adequately portray the benefits of “no-grazing” on Spotted Dog. The spread of invasive weeds would be far less, damage to seeps, springs and wetlands far less and there would be no additional cost to sportsmen.

### Elk

It's no mystery why the elk population in HD215 has grown significantly since the purchase of the WMA—Spotted Dog is prime elk habitat and provides exceptional winter range. While we appreciate the challenges private landowners surrounding the WMA face regarding forage damage, fence damage, etc. FWP has used every tool in the box over the last three years to knock back the elk population in HD215, including going so far as proposing a shoulder season within the WMA. In the 2018-19 season, elk were hunted for nearly six months with the shoulder season and hunters could harvest a cow with their A tag in the regular season. If a private landowner has too many elk on their private land, FWP has made it very easy for them to utilize public hunters to move the elk off of their property.

We also understand that aerial counting conditions have been poor over the past several years and FWP has no clear idea of how the population has responded to the increased hunting pressure. Because of this, HHA wrote a letter to the FWP Commission in February voicing concerns over yet another shoulder season without adequate data.

We believe the concept of providing free forage in exchange for an agreement to rest private pasture will not solve the issue of elk congregating on private land. In addition, it leaves us puzzled why FWP is so concerned about maintaining high quality winter range for elk on private land while they are intensely reducing the population. The analysis fails to acknowledge that although elk are currently above objective, they are doing well biologically and would likely do well with the current management into the future. Further, without clear data about the current population, this exchange may be premature if the elk population has been lowered closer to objective through the liberal regular season and shoulder season harvest over the past three years.

HHA also points out that it is counter productive to attempt to increase effective winter range while also attempting to curb the overall elk objective. Logically, increasing the quality of forage on private property pasture will not assist the Department in reducing the current population to objective.

A reduction of the population, as FWP would like to see, should have the same desired effect to minimize negative effects to the winter range. We are concerned this exchange may also open Pandora's Box for more “exchange grazing” on the WMA with other ranchers. Many operators would welcome the opportunity to rest their private pasture and run their cattle on the WMA.

### Public Access

A key element missing from this proposal is a guarantee of public access on private land in exchange for grazing on the WMA. While the proposal states a special access agreement of 150 hunter days, we would request a more formal agreement is developed to ensure any member of the public has opportunity to hunt the property, not a hand-picked few. Enrollment in block management, for



example, would alleviate much of the access concern while permission could still be granted by the Ranch themselves.

### It's all about the Habitat

Riparian areas represent a small fraction of the WMA, yet are used disproportionately by wildlife. Hansen noted that because of a century of grazing, most of the riparian areas are less than fully functioning and healthy. Although the past five years of rest have helped the situation, an incredible amount of livestock trespass occurred that has continued to hamper recovery. The EA mentions grazing in water gaps, but does not identify how many or what negative impact grazing on the seeps and springs may have on riparian health. We'd prefer not to see natural watering areas used as "sacrifice" areas where livestock congregate. Did FWP research other methods of watering? Tanks? Solar pumps?

If livestock are moved off the WMA in July and moved back to Fred Burr, is there anything to avoid cattle continuing to congregate on the bottom of Fred Burr Creek?

The EA discusses the benefits of livestock grazing to create patchwork habitat for a myriad of species. According to Hansen's study, this patchwork already exists on the WMA. In addition, this is not an ecosystem that historically developed with a keystone herbivore such as the shortgrass prairie east of the continental divide where bison were a dominant species. Livestock grazing is not a natural process on the WMA and the EA does not accurately portray the habitat benefits of not grazing the WMA.

Another chief concern is the spread of noxious weeds on the WMA. It is widely known that livestock grazing, as well as the permitted use of an ATV to monitor the allotment would exacerbate the spread of noxious weeds which would degrade valuable wildlife habitat.

There are no monitoring protocols or standards mentioned in the EA. How will FWP be able to judge whether they are meeting the objectives they hope to achieve? Are there triggers or habitat standards that have to be met?

Hansen's habitat assessment did not include a large section of the W Fork of Spotted Dog Creek where a significant portion of the grazing will occur (no exclusions mentioned). An initial habitat assessment should be performed before grazing occurs.

### Other wildlife concerns

How would FWP address livestock depredation on the WMA? Would livestock be pulled from the WMA pasture? Would FWP allow shooting / trapping of wolves / coyotes? Spotted Dog is identified as a critical corridor for grizzly connectivity between the GYE and NCDE and bears have been reported in the Deer Lodge valley.

Fred Burr Creek is a critical tributary for the upper Clark Fork. Did FWP investigate what effect livestock grazing/ increased sedimentation may have on the fishery?

### Cost/ Benefit

The cost of electric fencing, plus the cost of this EA, staff time, monitoring, etc. is not fully evaluated in this proposal, nor are the long-term costs to Montana sportsmen. A grazing fee, similar to what is charged on other WMA's was not explored nor included as an alternative in this proposal. We believe a fee would help offset management costs.

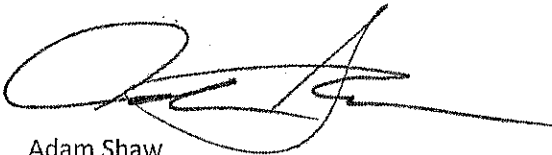
The Department has offered no evidence relating to public resources expended for damage caused by elk for this particular property. Without such information, it is impossible to determine whether the

expenses associated with the exchange are matched or exceeded by those historically expended to compensate damage caused by elk on this particular property.

Conclusion

HHA respectfully requests FWP withdraw this proposal. Alternatively, HHA requests that no action be taken as set forth in "Alternative A" in the Draft EA. At a minimum, FWP should develop an inclusive public process that addresses the above concerns and properly engages the interested public. Because of the significant controversy surrounding this proposal, we believe this proposal warrants an environmental impact statement.

Sincerely,

A handwritten signature in black ink, appearing to read 'AS', with a long horizontal flourish extending to the right.

Adam Shaw  
President  
Hellgate Hunters and Anglers

**Rose, Sharon**

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#29

**From:** Alec Underwood <alec@mtwf.org>  
**Sent:** Thursday, March 28, 2019 3:39 PM  
**To:** Rose, Sharon  
**Subject:** 29 (MWF, Chadwick)--Comments on Spotted Dog WMA grazing proposal EA  
**Attachments:** MWF SDWMA Grazing EA comments.pdf

Hello Sharon,

Please see the attached comments from the Montana Wildlife Federation regarding the Environmental Assessment for proposed grazing on Spotted Dog WMA.

Thank you,

Alec Underwood

**Alec Underwood**  
Western Field Representative  
Montana Wildlife Federation  
P.O. Box 1175  
Helena, MT 59624  
office: (406) 458-0227  
cell: (406) 303-0494  
[alec@mtwf.org](mailto:alec@mtwf.org)  
[www.montanawildlife.org](http://www.montanawildlife.org)



Protecting Montana's wildlife,  
land, waters and hunting & fishing  
heritage for future generations.

March 28th, 2019

Sharon Rose  
Department of Fish, Wildlife and Parks, Region 2  
3201 Spurgin Road  
Missoula, Montana 59801

RE: Proposal to use grazing on Spotted Dog WMA

Dear Ms. Rose,

The Montana Wildlife Federation (MWF) is Montana's oldest and largest sportsmen-wildlife conservation organization. We work to protect Montana's public lands, clean waters, and abundant fish and wildlife for the benefit of the hundreds of thousands of Montanans and people all over the nation who hunt, fish, and value Montana's outdoor heritage. We appreciate the opportunity to comment on the Environmental Assessment for the Proposal to Use Cattle Grazing for Managing Elk Habitat on a Portion of Spotted Dog WMA and Neighboring Private Lands.

Spotted Dog Wildlife Management Area (SDWMA) provides important habitat for game and non-game species. Due to the very high value of SDWMA to sportsmen, this grazing proposal is of significant interest to MWF members as well as other sportsmen's groups. Given the #1 guiding principle and primary purpose of the SDWMA, which is "to benefit wildlife and fish habitats, and natural resources on behalf of the general public", we have several concerns as to how the proposed grazing will achieve those goals.

Hansen et. al 2015 determined that some of the habitat in the proposed SDWMA pastures is "healthy but with problems". The wildlife habitat within SDWMA has declined in health from historic practices such as grazing. Allowing grazing within SDWMA will cause grasslands and riparian areas to recover at a slower rate compared to areas with no cattle grazing. Although we recognize the importance of adjacent lands as potential high quality winter range for elk, the proposal is slated toward elk management and not for the benefit of all wildlife species and their habitat within SDWMA.

One major concern is how this proposal will affect riparian habitat on SDWMA for game and non-game species. Though riparian and wetland habitat is a very small percentage of the pastures, it's used by many species and historic grazing on SDWMA has had serious impacts to these areas. Temporary fencing would be used to keep cattle from riparian areas, but there are no assurances on how or when fences will be monitored for effectiveness. Would the management of these fences fall entirely on the Department or would the permittee be responsible for maintenance?

The EA states that SDWMA pastures would be monitored to identify areas of heavy cattle use and actions to curtail those impacts that may include moving salt/mineral blocks, use of cross-fencing, and re-assessing cattle use of water sources. We expect that this continued monitoring and maintenance would be done by the department which seems to not be factored into the costs of this proposal. Additionally, we feel that the use of sportsmen dollars to pay for the temporary fencing and continued maintenance by FWP is not in line with the intent of managing for wildlife within SDWMA and for the benefit of the general public.

The Department states on page 18, comment 4b. that cattle would be removed from grazing in SDWMA during hot and dry conditions of late summer to avoid impacts to willows, shrubs, and wetter areas. However, cattle would still be allowed to graze through the month of July. We believe the Department has

failed to consider the impacts during drought years where we typically see extreme temperatures and drought throughout the month of July.

Invasive species such as cheatgrass and spotted knapweed present a threat to native grassland communities. Grazing may have the potential to allow noxious weed species to expand at a rapid rate which could cause ecological disruption and decreased forage values. Since there are already 22 identified noxious weed species within SDWMA (Hansen et al. 2015) and the EA clearly identifies the risk of spreading noxious weeds within the SDWMA pastures, we think the Department has failed to consider how cattle grazing will help solve noxious weed issues identified in the habitat plan.

We are also concerned with the process in which this proposal was developed and the potential unintended consequences. It is clear that FWP individually met with landowners in 2017-2018 to determine if certain private lands met the criteria for enhancing critical winter habitat for elk. We question why the Department is trying to advance this proposal without properly involving local sportsmen's groups. While we understand that some negotiations are best done individually with landowners, sportsmen's groups have not had an adequate opportunity to participate in the development of this proposal. This could have involved seeing the proposed pastures in the field or convening different stakeholder groups who have an interest in how grazing will affect SDWMA.

Adequate public access to SDWMA is important to hunters. Although the grazing agreement would allow for 150 hunter days per season, the access to SDWMA through McQueary Ranch would be regulated by the landowners. This would not guarantee a fair and equal process of access for sportsmen and we believe that if this agreement is to move forward then the permittee should be involved in FWP's Block Management Program.

In conclusion, MWF is not opposed to cattle grazing within SDWMA. However, the approach by the Department does not seem to be in the best interest of benefiting all fish and wildlife species and their habitat on SDWMA. MWF suggests the development of a more robust plan that includes monitoring standards that will ensure that there will be net benefits to wildlife. The proposal needs to better address these gaps to mitigate impacts to wildlife habitat, ensure a process for equal public access for sportsmen, and reduce costs to the Department.

Sincerely,



Dave Chadwick  
Executive Director

Rose, Sharon

#30

**From:** chase@siebenlivestock.com  
**Sent:** Thursday, March 28, 2019 4:54 PM  
**To:** Rose, Sharon  
**Subject:** 30 (Hibbard)--Public Comment: Proposal to Use Cattle Grazing for Managing Elk Habitat on a Portion of Spotted Dog WMA and Neighboring Private Lands--Draft EA

Name: Chase Hibbard

City: Helena

I am writing to support the proposal to use cattle grazing for improving elk habitat on portions of the Spotted Dog Wildlife Management Area.

I am a cattle rancher from Cascade and Lewis and Clark Counties who has been grazing the Beartooth Wildlife Management Area for 37 years. Initially the system included a mix of FWP and private acreage totaling 21,000 acres and it has recently been expanded to include 38,000 of public and private land.

Similar to the Spotted Dog proposal we have grazed according to the classic rest-rotation format, which allows two years of rest during the grazing season, one of which is season long rest. The proposed system on the Spotted Dog is even more conservative providing even more rest.

The benefits to the WMA have included improving plant health and vigor, stimulating re-growth of decadent upland grasses, and improving the water holding capacity of the soil. Elk distribution has improved as a result. Since implementation of the grazing system in 1992, elk numbers have grown from approximately 2000 to 4500 in the hunting district, and elk wintering on the game range (it is a winter range) have increased from as few as a couple hundred to over 2000.

The grazing principles employed on the game range are also employed on our private land, improving the soil as well as the grass quantity and quality.

If our experience is any indication there is great potential that properly managed cattle grazing on the Spotted Dog will be good for range, good for the elk, good for the hunters and good for the community.

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This e-mail was generated from the 'Proposal to Use Cattle Grazing for Managing Elk Habitat on a Portion of Spotted Dog WMA and Neighboring Private Lands--Draft EA' Public Notice Web Page.

Rose, Sharon

#31

**From:** Amy Seaman <aseaman@mtaudubon.org>  
**Sent:** Thursday, March 28, 2019 5:49 PM  
**To:** Rose, Sharon  
**Subject:** 31 (MA, Seaman)--Montana Audubon comments on Draft EA for SDWMA  
**Attachments:** SDWMA.pdf

Dear Sharon Rose,

Please accept comments on behalf of Montana Audubon regarding *A proposal to Use Cattle Grazing for Managing Elk Habitat on a Portion of the Spotted Dog Wildlife Management Area and Neighboring Private Lands - Draft Environmental Assessment (EA), February 26<sup>th</sup>, 2019.*

Please let me know if you have any questions.

Thanks so much,  
Amy

--  
 Amy Seaman  
 Conservation Program Manager  
 Montana Audubon  
 P.O Box 595  
 Helena, MT 59624  
[aseaman@mtaudubon.org](mailto:aseaman@mtaudubon.org)  
[facebook.com/MontanaAudubon](https://www.facebook.com/MontanaAudubon)

(406) 210-9449

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March 28<sup>th</sup>, 2019  
Region 2 FWP  
Attn: SDWMA Grazing  
Missoula, MT 59804

PO Box 595, Helena, MT 59624  
406-443-3949  
www.mtaudubon.org

Dear Sharon Rose,

Please accept comments on behalf of Montana Audubon regarding *A proposal to Use Cattle Grazing for Managing Elk Habitat on a Portion of the Spotted Dog Wildlife Management Area and Neighboring Private Lands - Draft Environmental Assessment (EA), February 26<sup>th</sup>, 2019.*

Our organization appreciates being contacted to comment on this plan and appreciates the time the Department of Fish, Wildlife & Parks (DFWP) has spent on the matter at hand.

In general, we appreciate the intent of the plan to enhance recovery of wetlands and riparian areas while enhancing the wildlife values within the Spotted Dog Wildlife Management Area (herein SDWMA). We are not opposed to targeted grazing being used for site-specific purposes, which we believe this proposal does, but we do believe it should be one of the lower priority management tools. In the case of this current proposal, Montana Audubon views the grazing plan at SDWMA to be a "case-study" type project, though we recognize that grazing has been a management tool put to use in other WMA's like Wall Creek. We also recognize that both the landscape within the WMA and within the private grazing lands included in this proposal are well adapted to grazing by large ungulates. We have continually supported habitat management as a priority over increased or manipulated harvest to manage wildlife populations, and so this proposal fits with those recommendations. It also fits with goals of maintaining migratory patterns for elk between National Forest and upland grasslands.

As many groups have pointed out, livestock grazing of WMA's in general does conflict with WMA lands intent to preserve habitat for all wildlife, as livestock are not wildlife. Grazing also impacts aesthetic values of a landscape where individuals are seeking to connect with their natural surroundings, and livestock grazing can lead to the introduction of invasive plant species, and an increase in cowbird predation on nesting birds. Though the proposal lacks rigorous scientific evidence that this type of grazing management has resulted in benefits to wildlife in other places, we appreciate the acknowledgement that including grazing as a management tool may be in conflict with wildlife habitat values the WMA is meant to protect. Though this is true, we believe that the proposal is written such that the intent clearly is to benefit wildlife. In our work with grassland bird species of concern like the Long-billed Curlew, we have found that well-managed grazing even in nesting areas, can provide suitable habitat within working lands. With a strong monitoring component, this management tool can be thoroughly assessed, and we would expect DFWP to discontinue its use unless positive results for wildlife are demonstrated. This project has great potential from a scientific monitoring standpoint.

In other studies of grazing effects on wildlife, surveys often need to be conducted over multiple years to avoid sampling effects cause by weather or other stochastic events. We would recommend surveying pastures using the Hansen et al. (2015) approach during and after project completion versus just after.

In conclusion, Montana Audubon supports the EA's general finding that a full Environmental Impact Statement is likely warranted, but disagree with findings that the proposed action will have only minor impacts or cause minor conflicts with existing land uses, and the importance of the site as a designated



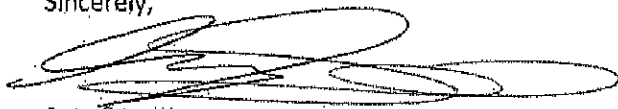
natural area. This conclusion is based on review of other public comment. We prefer that riparian areas within the proposed grazing pastures be entirely fenced off for the project duration, and that both landowners and DFWP emphasize managing stock water needs outside of these areas. Because the focus of our work is only peripherally on hunter access and opportunity, we have reserved our comments to factors affecting wildlife.

There are a few items that should be more thoroughly assessed in the final Record of Decision.

- We would have liked to see the document include information about whether current management at Spotted Dog WMA had resulted in any reduced pressure on adjacent landowners considering the large increase in elk using the area since the 2013 purchase.
- We are concerned that more analysis did not go into discerning the values of the project to upland birds, considering the location of the grassland affected. Birds like the Sharp-tailed grouse have received a lot of attention in other areas by DFWP, and they should be considered here. Upland birds that are found in the area would likely benefit from improved riparian and wetland areas, and would be affected by altered grass heights and forage availability. Though we also recognize elk as the primary animal in need of management at this site, the plan surprisingly limits its discussion of expected impacts on other ungulates like deer, moose, or antelope.
- While we believe this plan does have the potential to reduce landowner conflict in the area, including potential reductions in damaged fencing and illegal grazing, we would recommend the project should monitor able to demonstrate reductions in these issues.
- Finally, we are concerned that introducing livestock grazing into SDWMA may increase the potential for livestock-predator conflicts. This EA should include a plan for addressing these conflicts within the WMA, as even though this plan is intended to improve adjacent private landowner relationships, this could be offset by increased losses of cattle to predators.

Thank you again for the opportunity to comment on this proposal. We are generally supportive of the project and look forward to participating in various ways in the future.

Sincerely,



Amy Seaman

Conservation Program Manager