

PUBLIC COMMENTS (1) RECEIVED PERTAINING THE PROPOSED NORTH SHORE WMA FARMING LEASE RENEWAL

May 5, 2021

Dear Franz,

I would appreciate an elaboration on the agricultural practices being implemented on this land to give those who are more removed from these types of projects a better understanding. Three questions come to mind that I'd appreciate to be addressed:

- 1) Can biologists verify the crops being planted benefit waterfowl and other wildlife overall?
- 2) Does the lessee have designated spots to leave the crops unharvested that could be displayed visually in Appendix A?
- 3) What is done to the area that is non-cropland, as depicted in Appendix A?

To expand on why I ask these questions, I am assuming the practices being implemented are likely monoculture practices, which are increasingly damaging to ecosystems, rather than improving them. Monocultures are impacting ecosystems because of the lack of ecological principles implemented, large inputs of chemicals, and soil degradation¹. This lessee is apparently small and likely not doing large scale industrial farming, but I would appreciate if FWP can more clearly identify that these agricultural practices are indeed producing an overall positive impact, since traditional agriculture (at any capacity) is responsible for ecosystem declines, including it being the largest threat to bird extinctions². In my questions #1 and #2, part of the environmental assessment should be biologists verifying that the ecosystem is healthy and sustainable for the wildlife for which there is habitat to enhance and protect. I understand that FWP must approve the type and locations of the crops, but can previous crop types be provided in this proposal or does FWP already know what the lessee is planning to plant for this term and can FWP provide evidence this arrangement has been of or will benefit wildlife?

With that being said, has FWP considered expanding on their maintenance to improve the existing habitat? For example, would it be too costly to spend a year or so implementing regenerative farming practices in the general non-agricultural areas, so that the wildlife's livelihood would not rely so heavily on the agricultural practices of the lessee for food and shelter? After all, the non-action proposal indicates the wildlife would be negatively impacted if agriculture stopped and, in that sense, FWP is doing a disservice to enhance stewardship to these areas. Regenerative farming has been identified to promote sustainable and healthy soil, virtually pest free (naturally), and higher profit yields³. There are several regenerative farmers in Montana who are trailblazing this movement and showing win-win results for the people and ecosystems/wildlife⁴. Increasingly, these practices are likely to be the most effective way to fight climate change because the whole ecosystem of the practices will be more tolerant to the coming heat/drought stresses better than monoculture; In fact, monoculture farming/industrial agriculture may be nearly impossible at some point. Considering all of this, I feel like more is needed to be done for both alternatives, so that the wildlife isn't solely dependent on agricultural practices and FWP is not complacent with wildlife declines, if the lease isn't renewed.

I understand that regulatory agencies often do what is only required of them and what is currently being proposed is the minimum of what is required. However, we hear all the time about that being proactive against climate change, as things are happening faster and sooner than expected, is something that needs to be done and here is an opportunity to do so⁵. Whether my comments are taken into consideration for this proposal or not, I would appreciate understanding how FWP is changing their "business as usual" to adapt better to environmental issues we are facing in the future.

Thank you for taking the time to read my comments and I look forward to hearing the response.

Sincerely,

Heather

Citations:

1. Altieri. M.A. 1998. Ecological impacts of industrial agriculture and the possibilities for truly sustainable farming. *Monthly Review, NY*. Vol 50. Issue 3.
2. Stanton et al. 2017. Analysis of trends and agricultural drivers of farmland bird declines in North America: A review. *Agriculture, ecosystems and environment*.
3. LaCanne CE, Lundgren JG. 2018. Regenerative agriculture: merging farming and natural resource conservation profitably. *PeerJ* 6:e4428
4. Masters. N. Montana ranchers demonstrate regenerative agriculture in action. *Eco farming daily*. [Montana Ranchers Demonstrate Regenerative Agriculture in Action \(ecofarmingdaily.com\)](https://ecofarmingdaily.com)
5. Parks. N. 2009. UN Update: Climate change hitting sooner and stronger. *Environ. Sci. Technol.* Vol 43. Iss. 22. Pp 8475-8476