

From: Bert Otis
To: [Boccardori, Vanna](#)
Subject: [EXTERNAL] Alternative A (Proposed Action): Implement a 9-year habitat management program on Fleecer Mountain WMA
Date: Wednesday, July 27, 2022 2:45:25 PM

Dear Fish Wildlife & Parks Commission,

I support Alternative A the Implementation of a 9-year habitat management program on the Fleecer Montana WMA.

This plan will benefit the habitat on this WMA.

Thank you

Bert Otis

PO Box 60

Emigrant, MT 59027

From: Keith Kubista
To: [Boccardori, Vanna](#)
Subject: [EXTERNAL] Fleecer Grazing Project
Date: Wednesday, July 27, 2022 2:45:26 PM

I support the above referenced project and commend you and the Department for proposing this scale and duration of improvements to our public lands.

Meadow habitats are experiencing reduction in size through conifer encroachment due lack of fire and treatment which are necessary to stimulate growth of forbes and grasses. The type of activities this project contains will enhance these meadow habitats increasing forage and nutritional value for big game species.

It will have positive effects and outcomes on the land and wildlife, and be a benefit to sportsmen and livestock operators.

Thanks.

Keith Kubista

From: Ariel Overstreet-Adkins
To: [Boccardori, Vanna](#)
Cc: [Meg Smith](#)
Subject: [EXTERNAL] Fleecer Grazing
Date: Wednesday, July 27, 2022 2:45:17 PM
Attachments: [2022.7.1 EA Comment Letter.pdf](#)

Ms. Boccardori,

Please see the attached comments on the June 2022 Draft Environmental Assessment – Fleecer Wildlife Management Area Habitat Management Program on behalf of Meg Smith and Fleecer Cattle Company.

Ariel Overstreet-Adkins
Attorney/Owner
BLUEBIRD LAW
100 N 27th St., Ste 350
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Billings, MT 59103
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<http://bluebirdlawmt.com/> [bluebirdlawmt.com]



July 1, 2022

Vanna Boccadori
Butte Area Wildlife Biologist
Montana Fish, Wildlife and Parks
1820 Meadowlark Lane
Butte, MT 59701

Sent via email only to vboccadori@mt.gov

RE: Fleecer Cattle Company Comments to June 2022 Draft Environmental Assessment – Fleecer Wildlife Management Area Habitat Management Program

Dear Ms. Boccadori:

I am writing on behalf of Meg Smith, owner of Fleecer Cattle Company, to comment on the June 2022 Draft Environmental Assessment for the Fleecer Wildlife Management Area Habitat Management Program (“Draft EA”).

Fleecer Cattle Company supports Proposed Action – Alternative A versus the No Action Alternative, which would eliminate cattle grazing. However, Fleecer has several continuing concerns about the Proposed Action.

Fleecer Cattle Company is focused on three specific objectives for the Proposed Action in these comments.

Objective: Continue to manage the entire elk winter range in the Fleecer area as one unit regardless of ownership.

Historically, this effort has been three-pronged, including FWP, Fleecer Cattle Company and its predecessor, and the U.S. Forest Service. This Draft EA inexplicably appears to cut out the USFS by indicating that the USFS is only “potentially” included. Statements regarding “if or when USFS grazing plans can align with this proposed action...” are concerning because it appears that FWP is trying to dictate what the USFS can do with its own land and its grazing allotments. The USFS grazing allotment is a vital part of the Fleecer Cattle Company’s grazing program. The omission of the USFS from this Draft EA hinders the achievement of the first objective.



Objectives: Continue to minimize impacts of winter and spring use by elk on private land by providing quality habitat on public lands. AND Continue to work with local livestock producers to achieve wildlife management goals that also provide benefit to their operations.

While Fleecer Cattle Company appreciates the intent of this EA and these objectives, actions to date have been insufficient to address the wide-ranging impacts of elk on Fleecer Cattle Company's private property. FWP must take action to address these issues with more tools than just limited cattle grazing and controlled burns to remove old-growth smooth brome in an attempt to make FWP lands more attractive to the elk.

Fleecer Cattle Company reiterates the same concerns it raised in response to the December 2018 Draft Environmental Assessment – Fleecer Wildlife Management Area Grazing Lease Renewal. Although FWP owns thousands of acres bordering Fleecer Cattle Company, elk continue to prefer to winter on Fleecer Cattle Company lands. These private lands are lower in elevation than most of the acreage owned by FWP and have been managed with Best Management Practices, making this private range resource the most desirable and beneficial for wildlife use. Fleecer Cattle Company continues to experience 800+ elk on its private property throughout the winter and early spring months.

Because Fleecer Cattle Company is exchanging grazing for rest rotation of its private pastures, the grazing allowance should not alleviate FWP of its obligation to mitigate the continuing and worsening issues of elk overrunning Fleecer Cattle Company private lands.

The Final EA should address the elk numbers that will be expected to be allowed to winter on Fleecer Cattle Company lands. The Final EA should address allowed actions such as hazing or herding of elk off of Fleecer Cattle Company lands and the implementation of damage hunts.

The grazing plan alone, especially when already traded for through the rest and rotation of privately-owned pastures, is not enough to alleviate issues that Fleecer Cattle Company continues to experience. Since Fleecer Cattle Company changed operations from its predecessor, only half as many cattle will graze under the grazing lease. Yet, no change will be made to the elk numbers and damage that Fleecer Cattle Company is expected to withstand.

Fleecer Cattle Company needs relief from the impacts of elk, not just for the viability of the ranching operation, but also for the preservation of the soil and grass resource on the ranch. The cattle need the grass, the elk need the grass, and the grass needs rest in order to maintain strong root systems.

Fleecer Cattle Company intends to continue to work with FWP, however, Fleecer will not continue to accept the lopsided exchange represented by the grazing lease and this new proposed Habitat Management Program indefinitely. Other options are available to Fleecer Cattle Company to preserve its interest that may be contrary to FWP goals for elk management.

The Final EA should allow flexibility for Fleecer Cattle Company and FWP to explore new ideas to figure out how to change behavior patterns in wintering elk, so they do not spend so much time on Fleecer Cattle Company's private property. The lease agreement between FWP and

Fleecer Cattle Company should include a contingency plan to allow more grazing by Fleecer on the WMA to account for particularly bad winters when elk spend more time on the lower elevations of the Fleecer Cattle Company's private lands. Damage hunts and hazing or herding opportunities to move elk from private lands must be part of this plan.

Sincerely,

BLUEBIRD LAW



By

Ariel Overstreet-Adkins

From: Barbara Gibbons
To: [Boccardori, Vanna](#)
Subject: [EXTERNAL] Fleeceer WMA Comments
Date: Wednesday, July 27, 2022 2:45:24 PM
Attachments: [Comments on Fleeceer Wildlife Management Area.docx](#)

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Barbara Landgraf Gibbons

PO Box 460507

Polaris, MT 59746

406-366-2442

blandgrafgibbons@gmail.com

Comments on Fleecer Wildlife Management Area

Due July 1, 2022

1. Proposed action: Designed to improve range conditions for wintering elk and other wildlife species.

In trying to define what the proposed action is the document should define the situation that is driving the need for the proposed actions. What is the carrying capacity of the game range? What are the goals for number of animals this area can sustain without damaging the ecological resources? How does the MTFWP elk management plan fit into this management area? What are the vegetation conditions and suitability of the game range for wintering elk? Has any sort of inventory been conducted to determine this and also be able to determine if conditions are improving? The neighboring landowner has conducted their own inventory at their expense on their private land and understands the limits and trigger points at which management should be adjusted. This type of information should be available to the agency to make this determination. Areas such as Yellowstone National Park and the Prior Wildlife Horse Range have clear numbers that they deal with. The process then begins on how to accomplish this within the limits of their regulations.

2. The proposed action is unclear throughout the document and difficult to follow how all parties will be working together to meet the objective of improving range conditions for wintering elk and other wildlife species.
 - a. The number one item in the Coordinated Resource Plan was to “Manage the entire elk winter range in the Fleecer area as one unit regardless of ownership”. This again is mentioned in the objectives of the proposed action as being accomplished. I cannot see where this EA is addressing the unit as one 1) without the USFS being on board and having the information included in this EA 2) have information that better explains how this fits into the Fleecer Cattle Company operation. Are the AUM’s as given in the document too low/just right/too high to meet the objectives? It appears that the word “potentially” is given numerous times as to the involvement of the FS. In the original plan for Fleecer the idea of having the 3 entities and the designed rest rotation grazing system one needed to incorporate all three legs of the stool to have stability. It appears as though this is not the case as stated in this EA.
 - b. Part 2 of the proposed action is to renew an exchange-for-services agreement on the Fleecer Addition portion of the WMA along Divide Creek, involving FWP and Moose Creek Ranch. Is it proposed to extend this agreement for a 9-year term and would be in effect until 2031?

3. The amount of scoping to meet the requirements of the EA are weak.

The only alternative to the proposed is no action? This is inadequate to meet all the

requirements of the planning process. At least one alternative would be to devise a proper grazing plan IF the USFS is not involved in this management action. Another would be if there was a different grazing system put forward that may better address climate change on the game range which was not in the initial set-up years ago. Is there any additional information that includes additional techniques that might be used to increase the production of areas that the elk habituate in the winter and what are those habitats? How would seeding additional introduced areas that would provide this? How does the adjoining private landowner deal with tough winters where elk seek lower ground and how would this be incorporated into the plan? How is drought planned for in the plan? This is standard planning process for landowners to have some consistency in their operation and knowing trigger points to initiate different plans.

4. The amount of time to make comments is frustratingly short. Given everyone is busy less than one month is unacceptable. Groups that have dedicated personnel are able to concentrate on addressing this whereas the common citizen does not.

Thank you for the opportunity.

From: Katie Bump
To: [Boccardori, Vanna](#)
Subject: [EXTERNAL] Fleecer WMA comments
Date: Wednesday, July 27, 2022 2:45:19 PM
Attachments: [Fleecer 6.29.22.pdf](#)

Hello Vanna,

Attached are my comments on the draft EA for Fleecer WMA.

I think an interdisciplinary approach is needed, and development and analysis of more alternatives, per MEPA rules. You could boldly consider a lot more possibilities for habitat management than this.

The issue of elk leaving the game range to cause trouble on the neighboring private land needs to be addressed. Making the game range a better habitat could help.

One thing not included in this draft is the actual purpose - i.e. how many elk you want to sustain on this "critical" habitat. This is how you will measure success, and this is your purpose. Making agreements with the neighbors is not the purpose.

This does not seem to address the full scope of habitat management on the WMA except smooth brome areas. Instead, it is all about the agreements with ranchers to facilitate that "management."

Good luck with this, I know it is a challenge.

Katie Bump
bumps.best@gmail.com
PO Box 202, Dillon, MT 59725

KBump

Fleecer Habitat Plan Draft EA

Comments due 7/1/2022

1. Does this EA document meet the administrative requirements of the MDFWP administrative rules for MEPA? See Administrative Rules of Montana (ARM) 12.2.432 and other adjacent rules for how State agencies like MT FWP are to prepare EA's.

- a) Has there been adequate scoping - how did they discover and assess the potential issues? What preliminary scoping was done in communication with those potentially affected? Timeframe permitted for comment on the draft EA was only 19 business days including the announcement date, or 26 days counting weekends and one Federal holiday for comments. Request additional time for review of a revised or final draft.
- b) The draft EA states that the proposed action is routine and does not have impacts that would require full disclosure in an EIS or any special mitigation. The analysis of effects relies on a checklist completed by one person, a wildlife biologist for MTDFWP. Without discounting her experience, there is no evidence of interdisciplinary involvement, such as a report from a soil scientist, hydrologist, range management specialist, cultural resource specialist, lands and realty specialist, or forester – nor is there any examination of available data such as the Web Soil Survey.
- c) The draft EA does not identify any potential secondary or cumulative impacts on the physical environment or the human population in the area. The most affected human in the area, owner of Fleecer Cattle Company, and the many hunters who enjoy the elk sustained by the WMA do not appear to have been consulted prior to issuing this draft document and their concerns are not included.
- d) The Purpose and Benefit of Proposed Action needs to be clarified. Assuming that the purpose of WMA habitat management is to sustain elk in the winter months, December through February, the document should plainly state the situation that is driving the need for the actions proposed. How many elk are planned for? How much forage is available on the game range? It is no secret that there are problems for adjacent landowners due to elk leaving the game range in large numbers and grazing private forage resources, trampling and damaging fences, and potentially spreading disease. How does this habitat management plan address these issues? Is there a plan for management of the elk herd including population goals which should be referenced here with regard to habitat goals?
- e) There is a Proposed Action, and there is No Action (two alternatives presented). Are these the only reasonable alternatives? There are 4,700+ acres of land within the WMA, all dedicated to the purpose of winter elk habitat. What is the current productivity of these lands? What does the soil survey say is the potential productivity of these lands? How many AUM are needed to sustain the planned herd? How is drought being considered in the planning for the WMA?

What happened twenty or more years in the past – even back into the 1930's is not relevant except to show that in good years there has been more forage available and fewer elk. The problems we are seeing in the present are the elk herd has grown substantially, forage resources are inadequate on the WMA, and we are in an extended drought. The elk have

KBump

become habituated to leaving the WMA to feed on private forage resources, causing hardship and conflicts on private land, necessitating intervention such as special hunts and hazing. The current proposal is to continue to do what has been done for many years: manage WMA habitat through periodic livestock grazing, irrigation and fertilization of certain recently-acquired former hayfields on Divide Creek, with the additional use prescribed fire in smooth brome areas when livestock grazing is inadequate to stimulate grass growth. Under this plan we can only expect the same results, with elk leaving the WMA and increasing conflicts on private land.

What alternatives DO exist to improve the WMA habitat (more forage resources, better shelter, and fewer human-animal interactions) and/or adjust the elk population goals? We have been in a sustained drought period, and forage production is low. Why not consider actually improving forage resources on the WMA through seeding projects, perhaps introducing plant species such as Russian wildrye and forage kochia in areas suitable for their establishment, in coordination with reducing the elk herd while these areas get established. Such alternatives might require an actual interdisciplinary analysis and even an EIS, but they could significantly improve the ability of the WMA to sustain elk.

2. The Proposed Action needs to be clarified at the outset (page 2), with regard to the details of what agreements or leases are proposed with the two landowners and how everything will work together. It seems to change throughout the document until page 11.

- a. Part 1 of the proposed action seems to be to renew (for a period of 9 years) a fee grazing lease and a modified grazing exchange-of-use (EOU) agreement with a coordinated grazing program between FWP, Fleecer Cattle Company and *potentially* the U.S. Forest Service (USFS). What is this supposed to mean – POTENTIALLY? Page 11: *“If or when USFS grazing plans can align with this proposed action, an additional 94 AUMs could be utilized in the fall (56 AUMs via EOU and 38 AUMs via a separate fall fee-grazing lease).”* It seems there is no fee grazing lease or fall grazing EOU unless the USFS engages in the agreement. Therefore, it would be premature to discuss as part of the proposed action.

That issue aside, the EOU is described as encompassing up to 300 AUM of spring grazing with Fleecer Cattle Company. Page 6 of the document states that 500 AUM of spring grazing have been included in the EOU in the past 20+years. Why is the proposed action 200 AUM less than the historical EOU?

On page 6 the document states that grazing fees have been reduced by 50% in exchange for the maintenance of fences, etc. by the livestock owners. However, there is no specific mention of a fee grazing lease, nor of the status of the current lease or EOU with Fleecer Cattle Company. Without a fee grazing lease, will the ranchers still have to maintain the fences? On p. 3 the document indicates a Decision Notice authorizing the Fleecer WMA grazing program was last issued in 2019. Would the proposed action create an EOU with Fleecer Cattle Company for the years 2023-2031? What about the grazing lease – if any?

- b. Part 2 of the proposed action is to renew an exchange-for-services (EFS) agreement on the Fleecer Addition portion of the WMA along Divide Creek, involving FWP and Moose Creek Ranch (current agreement set to expire in 2023). This EFS allows Moose Creek Ranch up to 120 AUMs of livestock grazing annually (divided evenly between spring and fall use) through a deferred-

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rotation system on the Fleecer Addition portion of the WMA in exchange for Moose Creek Ranch maintaining and operating the irrigation system, managing noxious weeds, and maintaining fences on the Fleecer Addition parcel. It is proposed to extend this agreement for a 9-year term. So it would be in effect until 2031?

- c. Part 3 of the proposed action is to employ “controlled burning” as needed to better manage smooth brome fields on the WMA. The terminology is not good here - “prescribed burning” is the more appropriate phrase. It is not clear where prescribed burning might take place – in the Pond Field, or in the Fleecer Addition fields. How would the riparian WRP land in the Fleecer Addition be impacted by prescribed burning? Page 6 indicates burning would take place in the spring if livestock grazing (the previous spring, or the same spring?) did not sufficiently remove the old grass and promote current-year growth. It would be helpful to have a map of the specific locations of brome fields that could be subject to burning, and a report by a fire management specialist. In the Pond Field, with private property on two sides, and timber on the upper slope, there would possibly be some concerns with a planned burn. In the Fleecer Addition, there are also adjoining private lands and residences to consider. Air quality and water quality are also issues that should be addressed for a plan including burning. According to the Draft EA checklist, there would be no impacts from burning, but an interdisciplinary approach should reveal at least some concerns, and describe some mitigation. It seems this part of the proposed action is not fully developed or ripe for decision in its present form.

3. There is only one alternative offered to the proposed action – that is “no action?”

No action would discontinue the coordinated grazing management program with Fleecer Cattle Company on the WMA, and discontinue the EFS agreement with Moose Creek Ranch. The no action alternative is summarized, with one paragraph generally describing possible impacts, on page 12, while the impacts of the proposed action is treated with an extensive checklist (pages 13-24). For benefit of those not generally in favor of cattle on the WMA, full exploration of the impacts of no action alongside the proposed action would be helpful. One thing not mentioned is the impact of no grazing on fuel and fire hazard (increasing it). As noted above, other alternatives exist, but have not been explored in the document.

4. Looking at the Environment Checklist, a few issues:

- a) Land Resources (page 13): Since prescribed burning is included in this proposal, it would seem reasonable to indicate at least some potential impacts under parts d and e.
- b) Air (page 14): As above, with prescribed burning, there would be some impacts and a better description of the type of burning is needed.
- c) Water (pages 14-15): Which streams on the WMA have water quality issues, and what are they? It seems that cattle once again are the culprits, and the potential impacts of fire are not mentioned. It is certainly possible to have some impacts to water quality due to fire, “controlled” or not.
- d) Vegetation (pages 16-17): Minor and/or temporary change in plant communities is acknowledged. Elk are noted as the cause of aspen suppression. Evidently, lack of aspen is not a concern? Meanwhile cattle are singled out as causing a minor impact from spreading weeds on the WMA, even though there is a myriad of vectors listed that are potentially significant, and ongoing weed management – thanks in large part to the cattle owners – is helping keep weeds in check. The benefit of grazing bluebunch wheatgrass areas with cattle one year and resting it

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the next for use by elk is described, but the brome fields are not explored. The drought conditions which are so critical to forage production are not considered. "Climate change" has a very real impact on vegetation. Forage availability and the grazing capacity of the WMA is not discussed.

- e) Fish/Wildlife: Fish and Wildlife "critical habitat" is rather a broad and undefined term used here. In this checklist, any impacts are considered minor and mitigated by livestock management. Since we are talking about an elk winter range, this is the key question. The analysis should focus specifically on the carrying capacity and quality of the elk winter range. Is that not the critical habitat in question? By doing the proposed action, how will elk winter range be impacted? Numbers, please. How many elk are we planning for? IS there enough forage?

5. Looking at the Human Environment Checklist:

- a) Noise/electrical: none mentioned.
- b) Land use: A minor positive impact to local land use and economics of involved ranches is suggested. Numbers could help with this. Summarize all the costs of the participants for their labor and materials to maintain facilities, control weeds, irrigate, deal with rampant elk, recreationists and biologists, attend meetings, etc. and balance that against the benefits accrued by the EOU and EOS. It could also help perspective to show how the grazing available on the WMA/Addition helps keep ranches viable (or not), and the existence of ranches preserves open space and prevents suburban sprawl (ultimately reducing habitat). Since use of fire is a possibility, even a "controlled burn" can cause impacts, and the potential effect on residences should be mentioned.
- c) Community impact: Location, distribution, density, or growth rate of the human population should be unaffected, except... see above.
- d) Public Services/Taxes: see above.
- e) Aesthetics/Recreation: Some people do not think cows should be on this earth, especially on the WMA – so noted. Fences and gates would be there even without grazing, due to land ownership patterns, so opening/closing gates should not be an issue. Where is the tourism report mentioned here?
- f) Cultural Resources: Is there an inventory of the cultural resources of the WMA and Addition?
- g) Other – while we are at it, how about talking about fire management in general. How are wildfires to be managed in this "critical habitat"?

6. Cumulative effects

No cumulative or significant effects from the proposed action are identified per the checklist, concluding that an EIS is probably not needed. This is selling the proposal short, considering the benefits. The overall impact of a 9-year commitment could be quite important, though perhaps not an unmitigated disaster or irrevocable loss of resources. It will build stability into a couple of ranch operations and overall management of the WMA, and maintain some important working relationships which are presumed to have an overall positive impact on the primary purpose, which is to maintain critical elk winter habitat.

From: Les Castren
To: [Boccardori, Vanna](#)
Subject: [EXTERNAL] Fleecer WMA Grazing Plan
Date: Wednesday, July 27, 2022 2:45:20 PM

Interested Parties

I appreciate the opportunity to comment on the Fleecer WMA grazing plan with the adjacent landowner Fleecer

Cattle co and a renewal of exchange of services on the Fleecer Addition portion of the WMA.

Although I feel the agreements to be too long of time the opportunities in the agreement to make changes

i.e. change number of AUM's ,length of grazing times, pastures used is important especially in these times of serve

drought conditions. I feel provisions should be installed either a reduction in the number of AUM's or time allowed on allotments if lease

should decide to graze allotments of private grounds promised to be rested ,again because of drought conditions. .

I support the use of controlled burns to burn off decadent grasses.

I oppose any and all fall grazing of the WMA

I support the Fleecer WMA Grazing proposal.

THANK YOU

LES CASTREN

Butte, Montana

From: Les Castren
To: [Boccardori, Vanna](#)
Subject: [EXTERNAL] Fleecer WMA Grazing Proposal
Date: Wednesday, July 27, 2022 2:45:21 PM

Concerned Parties

Skyline Sportsmen's Assoc. and its 350+ members Supports the Fleecer WMA Grazing Proposal. The plan has worked well for all parties in the past and with its provisions to allow for changes i.e. AUM numbers time on allotments, resting of allotments in drought conditions, fall grazing adjustments if needed Skyline can support the plan as a whole.

Thank You

LES CASTREN

Director- Skyline Sportsmen Assoc.

Sent from [Mail \[go.microsoft.com\]](mailto:Mail [go.microsoft.com]) for Windows

From: Terry Ferguson
To: [Boccardori, Vanna](#)
Subject: [EXTERNAL] Fleecer WMA Habitat proposal
Date: Wednesday, July 27, 2022 2:45:31 PM

This letter is in support of implementing the 9-year comprehensive habitat management program on Fleecer WMA.

We must take care of and improve range conditions for wintering elk as well as as other species.

We are looking at a win/win situation with FWP's involvement in a cooperative effort with land owners. We are fortunate that FWP is managing elk winter habitat conditions in a way that is compatible with neighboring livestock interests.

Sincerely,

Terry Ferguson
621 Oak St
Anaconda, MT 59711

From: garrett ouldhouse
To: [Boccardori, Vanna](#)
Subject: [EXTERNAL] Fleecer WMA Habitat proposal
Date: Wednesday, July 27, 2022 2:45:33 PM

The Anaconda Sportsmen's Club is in favor of this proposal to implement a 9 year management program agreement for another nine years to help wintering Elk and it will preserve the Range conditions that prior programs have done. Thank You Gary Ouldhouse
President

From: Mark Savinski
To: [Boccadori, Vanna](#)
Subject: [EXTERNAL] Re: Fleecer WMA Habitat proposal
Date: Wednesday, July 27, 2022 2:45:28 PM

Dear Vanna: In overall principle, I agree with a comprehensive habitat management program on Fleecer WMA. It needs to be managed properly so that elk and other wildlife can flourish. I totally agree with the controlled burning aspect of the proposal. I feel the majority of the proposed agreement favors the landowner(s) a lot more than FWP. I think the agreement should be for no more than 5 years, instead of the proposed 9-year agreement, with annual FWP inspections of the property to ensure it is being managed properly, and with a smaller number of AUMs than 300. I would also be in favor of the landowner(s) having to make improvements on the WMA, not just on an as needed basis. The landowner(s) in question are already getting a huge financial break on their grazing costs, so they need to be required to give back and provide improvements to the property. It seems to me that FWP is getting short-changed in this proposal. Additionally, do the landowners in question allow the general public to hunt and recreate on their properties? If they do, that would go a long way with me to be a lot more positive about this proposal and other similar proposals. If they do not, it seems that FWP is providing a lot of benefits to private individuals that are taxpayer funded, and what is the general public really getting in return? Maybe FWP should start thinking more along these lines. If landowners allow more public hunting on their private properties, then they can participate in taxpayer-funded financially beneficial agreements with FWP and the State.

Sincerely,

Mark T. Savinski
25 Sundowner Road
Sheridan, MT 59749

From: Boccadori, Vanna <VBoccadori@mt.gov>
Sent: Tuesday, June 14, 2022 5:10 PM
To: Boccadori, Vanna <VBoccadori@mt.gov>
Subject: Fleecer WMA Habitat proposal

Hey folks,

FWP is proposing to implement a 9-year comprehensive habitat management program on Fleecer WMA designed to improve range conditions for wintering elk and other wildlife species. The program would include: 1) a renewal of a fee grazing lease and a modified grazing exchange-of-use (EOU) agreement with a coordinated grazing program between FWP, the adjacent landowner (Fleecer Cattle Company, formerly Smith 6-S Livestock) and potentially the U.S. Forest Service (USFS); 2) a renewal of an exchange-for-services (EFS) agreement on the Fleecer Addition portion of the WMA; and 3) incorporation of controlled burning on an as-needed basis to better manage

smooth brome fields on the WMA. This habitat management program would extend from May 2023 through October 2031.

Attached is the draft EA if you would like to review it and make comment. Comments will be accepted through 5pm on July 1st.

Cheers,
vb

Vanna Boccadori
FWP Butte Area Wildlife Biologist
1820 Meadowlark Lane, Butte, MT 59701
406-494-2082



From: Stanley Strizic
To: [Boccadori, Vanna](mailto:VBoccadori@mt.gov)
Subject: [EXTERNAL] Re: Fleecer WMA Habitat proposal
Date: Wednesday, July 27, 2022 2:45:30 PM

Vanna-

Thanks for the information. Alternative A is beneficial to the landowner and the health of the range, so it would have my support.

Thanks

Stan Strizic

On Tue, Jun 14, 2022 at 5:10 PM Boccadori, Vanna <VBoccadori@mt.gov> wrote:

Hey folks,

FWP is proposing to implement a 9-year comprehensive habitat management program on Fleecer WMA designed to improve range conditions for wintering elk and other wildlife species. The program would include: 1) a renewal of a fee grazing lease and a modified grazing exchange-of-use (EOU) agreement with a coordinated grazing program between FWP, the adjacent landowner (Fleecer Cattle Company, formerly Smith 6-S Livestock) and potentially the U.S. Forest Service (USFS); 2) a renewal of an exchange-for-services (EFS) agreement on the Fleecer Addition portion of the WMA; and 3) incorporation of controlled burning on an as-needed basis to better manage smooth brome fields on the WMA. This habitat management program would extend from May 2023 through October 2031.

Attached is the draft EA if you would like to review it and make comment. Comments will be accepted through 5pm on July 1st.

Cheers,

vb

Vanna Boccadori

FWP Butte Area Wildlife Biologist

1820 Meadowlark Lane, Butte, MT 59701

406-494-2082



From: vince@mt.gov
To: vince@mt.gov
Subject: ** Email from vince@mt.gov **
Date: Wednesday, July 27, 2011 2:40:23 PM

Name: Vince Colucci
Phone Number: (406) 544-3565
Email: vincecolucci@mt.gov
6/20/22
Vanna Boccadori
MT FWP Game Biologist

Dear Vanna:

Please allow me to comment regarding the Fleece Mountain Wildlife Management Area (WMA) grazing proposal.

First, I would applaud the FWP's efforts to engage with the landowners to reach an agreement that is beneficial to all parties concerned. As a sportsman and conservationist, I agree with the balance that should and needs to occur. Thanks for your and the Dept's efforts on this. Public land habitat stewardship is critical for optimal elk survival and herd health. Much of the Beaverhead-DL National Forest is, in my opinion, in need of significant improvement regards habitat management and stewarding. Private grazing and agricultural land interface with the public lands remains a critical issue and, importantly, the steps you have taken to work with the landowners on behalf of habitat and wildlife are very important, so thank you for that.

Second, the relationship between landowners and sportsmen/hunters remains critical and, essentially, a delicate balance. Clearly, these need to be win-win situations, respecting both the landowners, their properties and resources and the public's opportunities to hunt, fish, and trap. Elk often seem to be the tip of the spear. Done correctly, this would seemingly mitigate confrontational issues, optimize and balance elk herds, minimize harsh impact on the habitat and promote outcomes favored, I think, by all. FWP's grazing proposal and the previous grazing management proposals (e.g., Seymour watershed plan) are steps in the right direction.

Third, I have previously voiced my opinion regarding the road access into many of the B-DLNF areas and I think this applies in this case as well. Minimizing access by OHV, in my opinion, will improve elk strength, reduce herd pressure, mitigate impact on the habitat and avoid much spillover of the game onto private lands, thus, minimizing stress on the landowners' agricultural resources and reducing potential conflict.

Fourth, just a question? Since the Fleece Mountain WMA has several components not contiguous, i.e., including sections close to Fairmont Hot Springs in area 341, does this proposal apply to those as well?

Thank you for allowing me to comment.
Vince Colucci
Missoula

June 21, 2022

Vanna Boccadori, FWP Area Wildlife Biologist

1820 Meadowlark Lane

Butte, MT 59701

Subject: Fleecer Grazing

Dear Ms. Boccadori,

At this time, the Montana Sportsman Alliance (MSA) Leadership Group would like to take a moment to commend you and others from FWP for formulating what we believe to be a very well thought-out and comprehensive grazing management plan for the Fleecer WMA and adjoining lands. Although this proposal is quite complex and includes a number of partners, including adjoining private landowners, we believe this proposal encompasses the best possible outcome for elk and other wildlife in the area while at the same time minimizing conflicts on private land. Forming partnerships with other agencies and private landowners that truly benefit wildlife that is based on the best available science should be a goal for managers across the state. This proposal accomplishes that objective. Thank you for your efforts.

Sincerely,

Montana Sportsman Alliance Leadership Group

Joe Perry – Conrad

John Borgreen – Great Falls

JW Westman – Billings

Robert Wood – Hamilton

Steve Schindler – Lewistown

Tim Thier - Trego

Jeff Herbert – Helena

Don Thomas – Lewistown

Ray Gross - Dillon

Doug Krings – Lewistown

Dale Tribby – Miles City

Harvey Nyberg - Lewistown

Andrew McKean – Glasgow

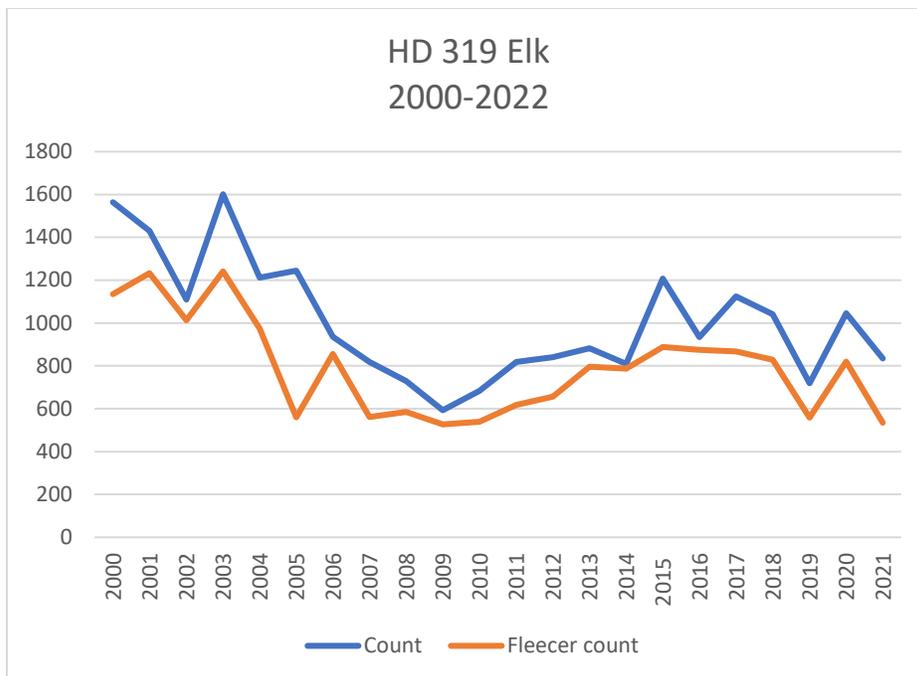
Greg Munther - Missoula

Comments on Fleecer WMA Habitat Management from an Individual from Dillon, MT
Position not clearly stated

1. Proposed action: Designed to improve range conditions for wintering elk and other wildlife species.

In trying to define what the proposed action is the document should define the situation that is driving the need for the proposed actions. What is the carrying capacity of the game range? What are the goals for number of animals this area can sustain without damaging the ecological resources? How does the MTFWP elk management plan fit into this management area? What are the vegetation conditions and suitability of the game range for wintering elk? Has any sort of inventory been conducted to determine this and also be able to determine if conditions are improving? The neighboring landowner has conducted their own inventory at their expense on their private land and understands the limits and trigger points at which management should be adjusted. This type of information should be available to the agency to make this determination. Areas such as Yellowstone National Park and the Prior Wildlife Horse Range have clear numbers that they deal with. The process then begins on how to accomplish this within the limits of their regulations.

FWP response: According to the current FWP Elk Management Plan (2005), the population objective for HD 319 is a maximum of 1,100 observed elk, with no more than 800 wintering on the Fleecer face. Since 2006, the population has been above 1,100 observed elk in HD 319 four times (2015, 2017, 2018, 2020) and the Fleecer face subobjective has been above 800 observed elk six times (2006, 2015, 2016, 2017, 2018, 2020) (Figure 1). Vegetation conditions on the WMA have been monitored by livestock exclosures since 2006 and permanent photo points since 1986. Both methods suggest a stable to increasing trend in health and vigor of the plant communities on the Fleecer WMA.



2. The proposed action is unclear throughout the document and difficult to follow how all parties will be working together to meet the objective of improving range conditions for wintering elk and other wildlife species.
 - a. The number one item in the Coordinated Resource Plan was to “Manage the entire elk winter range in the Fleecer area as one unit regardless of ownership”. This again is mentioned in the objectives of the proposed action as being accomplished. I cannot see where this EA is addressing the unit as one 1) without the USFS being on board and having the information included in this EA 2) have information that better explains how this fits into the Fleecer Cattle Company operation. Are the AUM’s as given in the document too low/just right/too high to meet the objectives? It appears that the word “potentially” is given numerous times as to the involvement of the FS. In the original plan for Fleecer the idea of having the 3 entities and the designed rest rotation grazing system one needed to incorporate all three legs of the stool to have stability. It appears as though this is not the case as stated in this EA.
 - b. Part 2 of the proposed action is to renew an exchange-for-services agreement on the Fleecer Addition portion of the WMA along Divide Creek, involving FWP and Moose Creek Ranch. Is it proposed to extend this agreement for a 9-year term and would be in effect until 2031?

FWP response: FWP developed this proposal in conjunction with the USFS, Fleecer Cattle Company and the Moose Creek Ranch. Foremost was ensuring that this proposal allowed FWP to best manage habitat for wintering elk and other wildlife on the WMA. A key component is using livestock grazing as a tool for habitat management, by removing accumulated dead grass and providing rest from livestock grazing during the growing season as much and where possible. Since 1986, the USFS scheduled rest into 2 of the 3 elk winter range pastures on the Fleecer allotment. To offset this rest, FWP cooperated by allowing light fall grazing on one of three WMA winter range pastures annually. Last year, the USFS moved away from scheduled rest on the three Fleecer allotment winter range pastures due to concerns over not meeting utilization metrics. They are currently working to correct this overutilization through changes in the grazing schedule. Since grazing an FWP pasture in the fall was only meant to offset rest on a USFS winter range pasture, FWP does not find it in the best interest of managing elk habitat on the WMA to remove even more feed for wintering elk. That is why this proposal leaves open the option for working with the USFS by hosting a fall grazing lease, i.e. if or when the USFS will once again provide scheduled rest to the Fleecer allotment winter range pastures. Until then, FWP has a responsibility to maintain forage for elk.

If the proposed action is approved, it gives FWP the authority to implement all portions of the proposed action for 9 years, beginning in 2023 and continuing through 2031.

3. The amount of scoping to meet the requirements of the EA are weak. **When is FWP required to do scoping? Rick...**

The only alternative to the proposed is no action? This is inadequate to meet all the requirements of the planning process. At least one alternative would be to devise a proper grazing plan IF the USFS is not involved in this management action. Another would be if there was a different grazing system put forward that may better address climate change on the game range which was not in the initial set-up years ago. Is

there any additional information that includes additional techniques that might be used to increase the production of areas that the elk habituate in the winter and what are those habitats? How would seeding additional introduced areas that would provide this? How does the adjoining private landowner deal with tough winters where elk seek lower ground and how would this be incorporated into the plan? How is drought planned for in the plan? This is standard planning process for landowners to have some consistency in their operation and knowing trigger points to initiate different plans.

FWP response:

4. The amount of time to make comments is frustratingly short. Given everyone is busy less than one month is unacceptable. Groups that have dedicated personnel are able to concentrate on addressing this whereas the common citizen does not.

FWP response: FWP felt the length of time for public comment on this environmental assessment was appropriate and commensurate with the scope of the proposed action.

Thank you for the opportunity.



6/16/2022

RE: Fleecer Grazing

Dear Vanna Boccadori,

Our organization, Montana Sportsmen for Fish and Wildlife (MTSFW), would like to comment on the Fleecer Mountain WMA grazing proposal. As a sportsmen's organization we support FWP's efforts to increase elk populations to their full potential on public lands. As stewards of the land and the public's elk, it is FWP's responsibility to minimize the impact that elk have on private lands by providing adequate habitat on public lands. We understand that this can be an arduous responsibility.

MTSFW supports your three prong approach of a grazing system, exchange for services, and control burning to manage smooth brome fields. The goal to coordinate resource management across land ownerships to alleviate conflict between wildlife and agricultural land, is key. Currently, the citizen appointed "Elk Working Group" is discussing the management of public lands as a component to elk distribution. MTSFW sees this grazing proposal and habitat management as a well planned effort to improve the winter range on the Fleecer WMA and working jointly with the landowners is key to its success.

MTSFW supports this proposal and applauds the forethought and effort put into this plan, which will allow for elk to be able to winter successfully on the Fleecer Mountain WMA.

Thank You,

Jeff Darrah
Executive Director
MTSFW
(406)239-0107